

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION NO.: 2484CV00171

IN RE: DERRICK TODD, M.D. et al

SPECIALLY ASSIGNED TO JUDGE
ANTHONY M. CAMPO

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT
CIVIL ACTION NO.: 2484CV00171

FORMER PATIENTS OF DERRICK TODD, M.D.,)
 Plaintiffs,)
)
 v.)
)
 DERRICK TODD, M.D.,)
 THE BRIGHAM AND WOMEN’S HOSPITAL, INC.,)
 BRIGHAM AND WOMEN’S FAULKNER HOSPITAL, INC.,)
 BRIGHAM AND WOMEN’S PHYSICIANS ORGANIZATION, INC.,)
 MASS GENERAL BRIGHAM COMMUNITY PHYSICIANS, INC.,)
 MASS GENERAL BRIGHAM INCORPORATED,)
 CHARLES MORRIS, M.D.,)
 SCOTT LEWIS SCHISSEL, M.D.,)
 SONALI DESAI, M.D.,)
 JOSEPH LOSCALZO, M.D.,)
 ELLEN GRAVALLESE, M.D.,)
 THOMAS SEQUIST, M.D.,)
 SUSAN RITTER, M.D.,)
 DAVID LOUIS, M.D.,)
 YAEL HERER, M.D.,)
 JEFFREY MITO, M.D.,)
 NATHAN CONNELL, M.D.,)
 KEVIN GIORDANO,)
 SUSAN DEMPSEY,)
 ANTHONY GUIDI, M.D.,)
 MARANJELY ROSARIO,)
 BWH JOHN/JANE DOES #1-10,)
 BWH OFFICERS AND DIRECTORS JOHN/JANE DOES #1-50,)
 BWH FAULKNER JOHN/JANE DOES #1-10,)
 BWH FAULKNER OFFICERS AND DIRECTORS JOHN/JANE DOES #1-50,)
 CHARLES RIVER MEDICAL ASSOCIATES, P.C.,)
 JOSEPH HARRINGTON, M.D.,)
 VINAY KUMAR, M.D.,)
 PAIGE MEISHEID, M.D.,)
 DOUGLAS GRONDA, M.D.,)

VINCENT YUAN, M.D.,)
 BRIAN PARILLO,)
 ANNA GOULET,)
 CHARLES RIVER MEDICAL ASSOCIATES JOHN/JANE DOES #1-10,)
 PRIMARY CARE PHYSICIAN JOHN/JANE DOES #1-225, and)
 GYNECOLOGIST JOHN/JANE DOES #1-225,)
)
 Defendants.)

PLAINTIFFS’ ORIGINAL MASTER COMPLAINT AND DEMAND FOR JURY TRIAL

INTRODUCTION

This Master Complaint is intended to apply to all cases brought by former patients of Derrick Todd, M.D., who seek to bring independent, but consolidated, actions in Suffolk County. In order to better manage the litigation, and in keeping with the Hon. Anthony Campo’s January 19, 2024 Case Management Order, each individual plaintiff will file their own separate action, incorporating this Master Complaint, in whole or in part, and relying on a Short Form Complaint with the individual’s name or pseudonym, and any facts specific to that individual’s claims.

PARTIES

1. The Plaintiffs are former patients of Derrick Todd, M.D. who allege they were victims of medical negligence and sexual assault and battery, while being seen and treated by Dr. Todd at multiple locations over multiple years.
2. The Defendant, Derrick Todd, M.D., was at all times relevant to this complaint, a physician practicing his profession at Brigham and Women’s Hospital, located in Boston, Suffolk County, Massachusetts, Brigham and Women’s Faulkner Hospital, located in Boston, Suffolk County, Massachusetts, and Charles River Medical Associates, located in Framingham, Middlesex County, Massachusetts.
3. The Defendant, The Brigham and Women’s Hospital, Inc., was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 75 Francis Street, Boston, MA 02115, in Suffolk County, Massachusetts.
4. At all times relevant, the Defendant, The Brigham and Women’s Hospital, Inc., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
5. The Defendant, Brigham and Women’s Faulkner Hospital, Inc., was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 1153 Centre Street, Boston, MA 02130, in Suffolk County, Massachusetts.
6. At all times relevant, the Defendant, Brigham and Women’s Faulkner Hospital, Inc., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.

7. The Defendant, Brigham and Women's Physicians Organization, Inc., was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 254 Second Avenue, Suite 100, Needham, MA 02494, in Norfolk County, Massachusetts.
8. At all times relevant, the Defendant, Brigham and Women's Physicians Organization, Inc., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
9. The Defendant, Mass General Brigham Community Physicians, Inc., was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 800 Boylston Street, Suite 1150, Boston, MA 02199, in Suffolk County, Massachusetts.
10. At all times relevant, the Defendant, Mass General Community Physicians, Inc., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
11. The Defendant, Mass General Brigham Incorporated, was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 800 Boylston Street, Suite 1150, Boston, MA 02199, in Suffolk County, Massachusetts.
12. At all times relevant, the Defendant, Mass General Brigham Incorporated, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
13. The Defendant, Charles Morris, M.D., was at all relevant times to this complaint a physician serving as the Chief Medical Officer at The Brigham and Women's Hospital.
14. At all times relevant, the Defendant, Charles Morris, M.D., as the Chief Medical Officer at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
15. At all times relevant, the Defendant, Charles Morris, M.D., as the Chief Medical Officer at The Brigham and Women's Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
16. The Defendant, Scott Lewis Schissel, M.D., was at all relevant times to this complaint a physician serving as the Associate Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's Hospital.
17. At all times relevant, the Defendant, Scott Lewis Schissel, M.D., as the Associate Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
18. At all times relevant, the Defendant, Scott Lewis Schissel, M.D., as the Associate Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's

Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.

19. The Defendant, Scott Lewis Schissel, M.D., was at all relevant times to this complaint a physician serving as the Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's Faulkner Hospital.
20. At all times relevant, the Defendant, Scott Lewis Schissel, M.D., as the Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's Faulkner Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
21. At all times relevant, the Defendant, Scott Lewis Schissel, M.D., as the Chief Medical Officer and Vice-President of Medical Affairs at The Brigham and Women's Faulkner Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
22. The Defendant, Sonali Desai, M.D., was at all relevant times to this complaint a physician practicing as a rheumatologist and serving as the Associate Chief Medical Officer and Vice-President of Quality at The Brigham and Women's Hospital.
23. At all times relevant, the Defendant, Sonali Desai, M.D., as the Associate Chief Medical Officer and Vice-President of Quality at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
24. At all times relevant, the Defendant, Sonali Desai, M.D., as the Associate Chief Medical Officer and Vice-President of Quality at The Brigham and Women's Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
25. The Defendant, Joseph Loscalzo, M.D., was at all relevant times to this complaint a physician serving as the Chairman of the Department of Medicine at The Brigham and Women's Hospital.
26. At all times relevant, the Defendant, Joseph Loscalzo, M.D., as the Chairman of the Department of Medicine at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
27. At all times relevant, the Defendant, Joseph Loscalzo, M.D., as the Chairman of the Department of Medicine at The Brigham and Women's Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
28. The Defendant, Ellen Gravallesse, M.D., was at all relevant times to this complaint a physician serving as the Chief of the Division of Rheumatology, Inflammation and Immunity

at The Brigham and Women's Hospital.

29. At all times relevant, the Defendant, Ellen Gravallesse, M.D., as the Chief of the Division of Rheumatology, Inflammation and Immunity at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
30. At all times relevant, the Defendant, Ellen Gravallesse, M.D., as the Chief of the Division of Rheumatology, Inflammation and Immunity at The Brigham and Women's Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
31. The Defendant, Thomas Sequist, M.D., was at all relevant times to this complaint a physician serving as the Chief Medical Officer of Mass General Brigham and in other leadership positions at Mass General Brigham (formerly Partners Healthcare).
32. At all times relevant, the Defendant, Thomas Sequist, M.D., as the Chief Medical Officer of Mass General Brigham and in other leadership positions at Mass General Brigham, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
33. At all times relevant, the Defendant, Thomas Sequist, M.D., Chief Medical Officer of Mass General Brigham and in other leadership positions at Mass General Brigham, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
34. The Defendant, Susan Ritter, M.D., was at all relevant times to this complaint a physician serving as the Director of Clinical Rheumatology at The Brigham and Women's Hospital.
35. At all times relevant, the Defendant, Susan Ritter, M.D., as the Director of Clinical Rheumatology at The Brigham and Women's Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
36. At all times relevant, the Defendant, Susan Ritter, M.D., as the Director of Clinical Rheumatology at The Brigham and Women's Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
37. The Defendant, David Louis, M.D., was at all relevant times to this complaint a physician serving as the Chair of the Department of Pathology at The Brigham and Women's Hospital.
38. At all times relevant, the Defendant, David Louis, M.D., as the Chair of the Department of Pathology at The Brigham and Women's Hospital, was responsible for the oversight and management of the hospital laboratory, including specimens of various types submitted by doctors in various specialties.
39. At all times relevant, the Defendant, David Louis, M.D., as the Chair of the Department of Pathology at The Brigham and Women's Hospital, was responsible for ensuring that testing submitted was appropriate for the specialty of the physician submitting the specimen.

40. The Defendant, Yael Herer, M.D., was at all relevant times to this complaint a physician serving as the Quality and Safety Director and Clinical Director of Quality and Safety in the Department of Pathology at The Brigham and Women's Hospital.
41. At all times relevant, the Defendant, Yael Herer, M.D., as the Quality and Safety Director and Clinical Director of Quality and Safety in the Department of Pathology at The Brigham and Women's Hospital, was responsible for the oversight and management of the hospital laboratory, including specimens of various types submitted by doctors in various specialties.
42. At all times relevant, the Defendant, Yael Herer, M.D., as the Quality and Safety Director and Clinical Director of Quality and Safety in the Department of Pathology at The Brigham and Women's Hospital, was responsible for ensuring that testing submitted was appropriate for the specialty of the physician submitting the specimen.
43. The Defendant, Jeffrey Mito, M.D., was at all relevant times to this complaint a physician serving as the Chief of Cytology in the Department of Pathology at The Brigham and Women's Hospital.
44. At all times relevant, the Defendant, Jeffrey Mito, M.D., as the Chief of Cytology in the Department of Pathology at The Brigham and Women's Hospital, was responsible for the oversight and management of the hospital laboratory, including specimens of various types submitted by doctors in various specialties.
45. At all times relevant, the Defendant, Jeffrey Mito, M.D., as the Chief of Cytology in the Department of Pathology at The Brigham and Women's Hospital, was responsible for ensuring that testing submitted was appropriate for the specialty of the physician submitting the specimen.
46. The Defendant, Nathan Connell, M.D., was at all relevant times to this complaint a physician serving as the Chief of Medicine at Brigham and Women's Faulkner Hospital.
47. At all times relevant, the Defendant, Nathan Connell, M.D., as the Chief of Medicine at Brigham and Women's Faulkner Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
48. At all times relevant, the Defendant, Nathan Connell, M.D., as the Chief of Medicine at Brigham and Women's Faulkner Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
49. The Defendant, Kevin Giordano, was at all relevant times to this complaint the President and Chief Operating Officer at Brigham and Women's Faulkner Hospital.
50. At all times relevant, the Defendant, Kevin Giordano, as the President and Chief Operating Officer at Brigham and Women's Faulkner Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
51. At all times relevant, the Defendant, Kevin Giordano, as the President and Chief Operating Officer at Brigham and Women's Faulkner Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its

- practicing physicians practicing at and under the auspices of its organization.
52. The Defendant, Susan Dempsey, was at all relevant times to this complaint the Vice President of Clinical Services at Brigham and Women's Faulkner Hospital.
 53. At all times relevant, the Defendant, Susan Dempsey, as the Vice President of Clinical Services at Brigham and Women's Faulkner Hospital, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
 54. At all times relevant, the Defendant, Susan Dempsey, as the Vice President of Clinical Services at Brigham and Women's Faulkner Hospital, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
 55. The Defendant, Anthony Guidi, M.D., was at all relevant times to this complaint a physician serving as the Chief of the Department of Pathology at Brigham and Women's Faulkner Hospital.
 56. At all times relevant, the Defendant, Anthony Guidi, M.D., as the Chief of the Department of Pathology at Brigham and Women's Faulkner Hospital, was responsible for the oversight and management of the hospital laboratory, including specimens of various types submitted by doctors in various specialties.
 57. At all times relevant, the Defendant, Anthony Guidi, M.D., as the Chief of the Department of Pathology at Brigham and Women's Faulkner Hospital, was responsible for ensuring that testing submitted was appropriate for the specialty of the physician submitting the specimen.
 58. The Defendant, Maranjely Rosario, was at all relevant times to this complaint, upon information and belief, an employee working as an administrative assistant at Brigham and Women's Faulkner Hospital.
 59. At all times relevant, the Defendant, Maranjely Rosario, was working with Derrick Todd, M.D. and responsible for scheduling patient appointments and coordinating testing, among other duties.
 60. The Defendants, BWH John/Jane Does #1-10, were at all times relevant to this complaint, individuals who were physician colleagues and/or supervisory/administrative professionals for The Brigham and Women's Hospital corporate defendant in a position to hire, oversee, manage, review, credential, and retain Derrick Todd, M.D.
 61. The Defendants, BWH Faulkner John/Jane Does #1-10, were at all times relevant to this complaint, individuals who were physician colleagues and/or supervisory/administrative professionals for Brigham and Women's Faulkner Hospital corporate defendant in a position to hire, oversee, manage, review, credential, and retain Derrick Todd, M.D.
 62. The Defendants, BWH Officers and Directors John/Jane Does #1-30, were at all times relevant to this complaint, individuals who were officers, directors, or other board level individuals at The Brigham and Women's Hospital corporate defendant.
 63. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-30, were at all times relevant to this complaint, individuals who were officers, directors, or other board level

individuals for Brigham and Women's Faulkner Hospital corporate defendant.

64. The Defendant, Charles River Medical Associates, P.C., was at all times relevant to this complaint a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 600 Worcester Street, #303, Framingham, MA 01702, in Middlesex County, Massachusetts.
65. At all times relevant, the Defendant, Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
66. The Defendant, Joseph Harrington, M.D., was at all times relevant to this complaint, upon information and belief, a physician practicing his profession and serving as the Director, Chief Financial Officer, Treasurer, Secretary, and President of Charles River Medical Associates, P.C.
67. At all times relevant, the Defendant, Joseph Harrington, M.D., as the Director, Chief Financial Officer, Treasurer, Secretary, and President of Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
68. At all times relevant, the Defendant, Joseph Harrington, M.D., was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
69. The Defendant, Vinay Kumar, M.D., was at all times relevant to this complaint, upon information and belief, a physician practicing his profession and serving as the Chief Executive Officer, Director, and President of Charles River Medical Associates, P.C.
70. At all times relevant, the Defendant, Vinay Kumar, M.D., as the Chief Executive Officer, Director, and President of Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
71. At all times relevant, the Defendant, Vinay Kumar, M.D., was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
72. The Defendant, Paige Meisheid, M.D., was at all times relevant to this complaint, upon information and belief, a physician practicing her profession and serving as the Director, Chief Financial Officer, and Treasurer of Charles River Medical Associates, P.C.
73. At all times relevant, the Defendant, Paige Meisheid, M.D., as the Director, Chief Financial Officer, and Treasurer of Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
74. At all times relevant, the Defendant, Paige Meisheid, M.D., was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.

75. The Defendant, Douglas Gronda, M.D., was at all times relevant to this complaint, upon information and belief, a physician practicing his profession and serving as the Vice President and Director of Charles River Medical Associates, P.C.
76. At all times relevant, the Defendant, Douglas Gronda, M.D., as the Vice President and Director of Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
77. At all times relevant, the Defendant, Douglas Gronda, M.D., was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
78. The Defendant, Vincent Yuan, M.D., was at all times relevant to this complaint, upon information and belief, a physician practicing his profession at Charles River Medical Associates, P.C.
79. At all times relevant, the Defendant, Vincent Yuan, M.D., as a physician at Charles River Medical Associates, held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
80. At all times relevant, the Defendant, Vincent Yuan, M.D., was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
81. The Defendant, Brian Parillo, was at all times relevant to this complaint, upon information and belief, the Executive Director at Charles River Medical Associates, P.C.
82. At all times relevant, the Defendant, Brian Parillo, as the Executive Director at Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
83. At all times relevant, the Defendant, Brian Parillo, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
84. The Defendant, Anna Goulet, was at all times relevant to this complaint, upon information and belief, the Hiring Manager and a Quality and Workforce Specialist at Charles River Medical Associates, P.C.
85. At all times relevant, the Defendant, Anna Goulet, as Hiring Manager and a Quality and Workforce Specialist at Charles River Medical Associates, P.C., held out Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
86. At all times relevant, the Defendant, Anna Goulet, was responsible for the hiring, supervision, retention, credentialing and oversight of Derrick Todd, M.D. as one of its practicing physicians practicing at and under the auspices of its organization.
87. The Defendants, Charles River Medical Associates John/Jane Does #1-10, were at all times relevant to this complaint, individuals who were officers, directors, other board level

individuals, or other supervisory/administrative professionals for Charles River Medical Associates corporate defendant in a position to hire, oversee, manage, review, credential, and retain Derrick Todd, M.D.

88. The Defendants, Primary Care Physician John/Jane Does #1-225, were at all times relevant to this complaint, individuals who were physicians practicing primary care and treating patients who were also being seen by Derrick Todd, M.D.
89. The Defendants, Gynecologist John/Jane Does #1-225, were at all times relevant to this complaint, individuals who were physicians practicing gynecology and treating patients who were also being seen by Derrick Todd, M.D.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to M.G.L. c. 223A, §2 and §3, and M.G.L. c. 212, §3. Venue is appropriate pursuant to M.G.L. c. 214, § 5 as the events at issue took place at Brigham and Women's Hospital, located in Boston, Suffolk County, Massachusetts, Brigham and Women's Faulkner Hospital, located in Boston, Suffolk County, Massachusetts, and Charles River Medical Associates, located in Framingham, Middlesex County, Massachusetts.

FACTS COMMON TO ALL COUNTS

1. At all times relevant to this complaint, Derrick Todd, M.D. was a physician, practicing primarily in the specialty of rheumatology.
2. From 2009 through July, 2023, Derrick Todd, M.D. was in clinical practice providing direct patient care at the Brigham and Women's Hospital and Brigham and Women's Faulkner Hospital as a physician in the Division of Rheumatology, Inflammation, and Immunity.
3. From 2010 through July, 2023, Derrick Todd, M.D. was in clinical practice providing direct patient care at Charles River Medical Associates, P.C. as a rheumatologist.
4. In 2006, Derrick Todd, M.D. became Board Certified in Internal Medicine.
5. In 2008, Derrick Todd, M.D. became Board Certified in Rheumatology.
6. In 2016, Derrick Todd, M.D.'s Board Certification in Internal Medicine lapsed. He did not recertify in Internal Medicine at that time, and he was not Board Certified in Internal Medicine at any point after 2016.
7. At some point, Derrick Todd, M.D. recertified in Rheumatology, and maintained his Board Certification in Rheumatology up until 2023 when it was rescinded by the certifying body following his agreement with the Board of Registration in Medicine not to practice.
8. Every two years, when Derrick Todd, M.D. held a medical license in Massachusetts, he was required to report to the Board of Registration in Medicine how many hours he was working. He consistently reported he worked an average of 40 hours/week, of which 37 were outpatient hours and 3 were inpatient hours.

9. Derrick Todd, M.D. routinely saw patients outside of regularly scheduled hours, offering to see patients early in the morning, or later in the evening, at times when staff was not on site.
10. Derrick Todd, M.D. routinely violated physician-patient boundaries by texting with patients, providing information that was not relevant to medical care, and by asking personal and invasive questions relating to sex designed to intimidate his patients.
11. While in the course of his employment at Brigham and Women's Hospital and Brigham and Women's Faulkner Hospital, Derrick Todd, M.D. had direct access to patients for examinations.
12. While in the course of his employment at Charles River Medical Associates, P.C., Derrick Todd, M.D. had direct access to patients for examinations.
13. While in the course of his employment, and under the auspices of providing "primary care" to his rheumatology patients, Derrick Todd, M.D. performed inappropriate pelvic examinations, pelvic floor therapy, breast examinations, testicular examinations, and rectal examinations on patients. These examinations were performed for his own personal and sexual gratification.
14. Derrick Todd, M.D. often performed breast, pelvic and rectal examinations without a chaperone, and he convinced patients who asked that they did not need to have a chaperone.
15. Derrick Todd, M.D. often performed pelvic examinations without sterile gloves, and he convinced patients who asked that they did not need to have him use a glove.
16. Derrick Todd, M.D. often performed pelvic examinations without lubricant, and he convinced patients who asked that they did not need to have him use lubricant.
17. Derrick Todd, M.D. often performed breast examinations on adult patients with no medical history to suggest a breast examination was medically necessary, medically warranted, and without a legitimate medical basis for such an exam.
18. Derrick Todd, M.D. performed breast examinations on teenage girls with no medical history to suggest a breast examination was medically necessary, medically warranted, and without a legitimate medical basis for such an exam.
19. Derrick Todd, M.D. often performed pelvic examinations on patients with no medical history to suggest a pelvic examination was medically necessary, medically warranted, and without a legitimate medical basis for such an exam.
20. Derrick Todd, M.D. often performed pelvic floor therapy without a chaperone, and he convinced patients who asked that they did not need to have a chaperone.
21. Derrick Todd, M.D. often performed pelvic floor therapy without sterile gloves, and he convinced patients who asked that they did not need to have him use a glove.
22. Derrick Todd, M.D. performed pelvic floor therapy on patients with no medical history to suggest pelvic floor therapy was medically necessary, medically warranted, and without a legitimate medical basis for such treatment.

23. Often, these pelvic floor therapy sessions lasted for several minutes, sometimes as long as half an hour.
24. Derrick Todd, M.D. told patients they may experience arousal and may climax during his pelvic floor therapy sessions, and they should not feel uncomfortable if that occurred as that was part of the therapy process.
25. Derrick Todd, M.D. lacked the training, knowledge, competency, and skill to perform pelvic floor therapy, however he convinced patients who asked that he indeed was competent to perform pelvic floor therapy.
26. Derrick Todd, M.D. persuaded patients to terminate existing doctor-patient relationships with other treating physicians in order to gain additional access to patients for his own personal pleasure and gratification.
27. Derrick Todd, M.D. solicited persons with whom he had no existing doctor-patient relationship to become his patients in order to gain access to additional patients he could abuse for his own personal pleasure and gratification.
28. Derrick Todd, M.D. solicited and persuaded existing patients to encourage their family members, including teenagers, and including persons with no known rheumatologic condition, to come to see him as new patients, for the purpose of expanding the pool of patients he could abuse for his own personal pleasure and gratification.
29. Derrick Todd, M.D. often provided his rheumatology patients with incorrect and/or false diagnoses and improper medical care while using his power as a physician to abuse them.
30. Upon information and belief, these horrifying, traumatizing, and deplorable acts took place over years, from at least as far back as 2011 and continuing through July, 2023, at which time Derrick Todd, M.D., having been investigated by the Brigham and Women's Hospital and the Board of Registration in Medicine, formally resigned from the Brigham and Women's Hospital on July 31, 2023.
31. Upon information and belief, reports were provided concerning Derrick Todd M.D.'s inappropriate behaviors as far back as 2010.
32. In or about August, 2023, the Defendant Charles River Medical Associates, P.C. notified patients of Derrick Todd, M.D. that he was not seeing patients for a period of three months.
33. The Defendant Charles River Medical Associates, P.C. did not notify patients of Derrick Todd, M.D. that the cessation of Dr. Todd's patient visits was due to his inappropriate, unethical, unnecessary, negligent, and/or criminal behavior and conduct.
34. In or about October, 2023, the Defendant Charles River Medical Associates, P.C. notified patients of Derrick Todd, M.D. that he was no longer seeing patients.
35. The Defendant Charles River Medical Associates, P.C. did not notify patients of Derrick Todd, M.D. that Dr. Todd's termination was due to his inappropriate, unethical, unnecessary, negligent, and/or criminal behavior and conduct.

36. In or about August, 2023, the Defendant Brigham and Women's Hospital notified patients of Derrick Todd, M.D. that he was no longer seeing patients.
37. The Defendant Brigham and Women's Hospital did not notify patients of Derrick Todd, M.D. that Dr. Todd's termination was due to his inappropriate, unethical, unnecessary, negligent, and/or criminal behavior and conduct.
38. In or about September, 2023, the Defendant Brigham and Women's Hospital notified patients of Derrick Todd, M.D. that he was no longer seeing patients.
39. The Defendant Brigham and Women's Hospital did not notify patients of Derrick Todd, M.D. that Dr. Todd's termination was due to his inappropriate, unethical, unnecessary, negligent, and/or criminal behavior and conduct.
40. On or about September 5, 2023, Derrick Todd, M.D. entered into a voluntary agreement not to practice medicine with the Board of Registration in Medicine.
41. The Defendant, Derrick Todd, M.D., owed his patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
42. The Defendant, Derrick Todd, M.D., breached his duty of care when he performed inappropriate bodily examinations, practiced gynecological medicine in an unauthorized manner, and sexually assaulted and battered patients under the auspices of providing medical care.
43. The Defendant, The Brigham and Women's Hospital, Inc., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
44. The Defendant, The Brigham and Women's Hospital, Inc., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
45. The Defendant, The Brigham and Women's Hospital, Inc., by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
46. The Defendant, The Brigham and Women's Hospital, Inc., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
47. The Defendant, The Brigham and Women's Hospital, Inc., breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.

48. The Defendant, The Brigham and Women's Hospital, Inc.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
49. The Defendant, Brigham and Women's Faulkner Hospital, Inc., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
50. The Defendant, Brigham and Women's Faulkner Hospital, Inc., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
51. The Defendant, Brigham and Women's Faulkner Hospital, Inc., by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
52. The Defendant, Brigham and Women's Faulkner Hospital, Inc., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
53. The Defendant, Brigham and Women's Faulkner Hospital, Inc., breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
54. The Defendant, Brigham and Women's Faulkner Hospital, Inc.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
55. The Defendant, Brigham and Women's Physicians Organization, Inc., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
56. The Defendant, Brigham and Women's Physicians Organization, Inc., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
57. The Defendant, Brigham and Women's Physicians Organization, Inc., by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
58. The Defendant, Brigham and Women's Physicians Organization, Inc., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who

refrained from sexual assault and battery and inappropriate examinations of patients.

59. The Defendant, Brigham and Women's Physicians Organization, Inc., breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
60. The Defendant, Brigham and Women's Physicians Organization, Inc.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
61. The Defendant, Mass General Brigham Community Physicians, Inc., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
62. The Defendant, Mass General Brigham Community Physicians, Inc., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily
63. examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
64. The Defendant, Mass General Brigham Community Physicians, Inc., by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
65. The Defendant, Mass General Brigham Community Physicians, Inc., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
66. The Defendant, Mass General Brigham Community Physicians, Inc., breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
67. The Defendant, Mass General Brigham Community Physicians, Inc.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
68. The Defendant, Mass General Brigham Incorporated, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
69. The Defendant, Mass General Brigham Incorporated, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

70. The Defendant, Mass General Brigham Incorporated, by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
71. The Defendant, Mass General Brigham Incorporated, had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
72. The Defendant, Mass General Brigham Incorporated, breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
73. The Defendant, Mass General Brigham Incorporated's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
74. The Defendant, Charles Morris, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
75. The Defendant, Charles Morris, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
76. The Defendant, Charles Morris, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
77. The Defendant, Charles Morris, M.D., had a duty to hire, train, supervise, manage, credential, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
78. The Defendant, Charles Morris, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
79. The Defendant, Charles Morris, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
80. The Defendant, Scott Lewis Schissel, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
81. The Defendant, Scott Lewis Schissel, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the

- unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
82. The Defendant, Scott Lewis Schissel, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
 83. The Defendant, Scott Lewis Schissel, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
 84. The Defendant, Scott Lewis Schissel, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
 85. The Defendant, Scott Lewis Schissel, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
 86. The Defendant, Sonali Desai, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 87. The Defendant, Sonali Desai, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 88. The Defendant, Sonali Desai, M.D., breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
 89. The Defendant, Sonali Desai, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
 90. The Defendant, Sonali Desai, M.D., breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
 91. The Defendant, Sonali Desai, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
 92. The Defendant, Joseph Loscalzo, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 93. The Defendant, Joseph Loscalzo, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about

Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

94. The Defendant, Joseph Loscalzo, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
95. The Defendant, Joseph Loscalzo, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
96. The Defendant, Joseph Loscalzo, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
97. The Defendant, Joseph Loscalzo, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
98. The Defendant, Ellen Gravallese, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
99. The Defendant, Ellen Gravallese, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
100. The Defendant, Ellen Gravallese, M.D., breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
101. The Defendant, Ellen Gravallese, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
102. The Defendant, Ellen Gravallese, M.D., breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
103. The Defendant, Ellen Gravallese, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
104. The Defendant, Thomas Sequist, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

105. The Defendant, Thomas Sequist, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
106. The Defendant, Thomas Sequist, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
107. The Defendant, Thomas Sequist, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
108. The Defendant, Thomas Sequist, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
109. The Defendant, Thomas Sequist, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
110. The Defendant, Susan Ritter, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
111. The Defendant, Susan Ritter, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
112. The Defendant, Susan Ritter, M.D., breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
113. The Defendant, Susan Ritter, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
114. The Defendant, Susan Ritter, M.D., breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
115. The Defendant, Susan Ritter, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
116. The Defendant, David Louis, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault

and battery under the auspices of providing medical care.

117. The Defendant, David Louis, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
118. The Defendant, David Louis, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D. the unauthorized practice of gynecological medicine by Derrick Todd, M.D. and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
119. The Defendant, David Louis, M.D., had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
120. The Defendant, David Louis, M.D., breached his duty of care when he failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
121. The Defendant, David Louis, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
122. The Defendant, Yael Herer, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
123. The Defendant, Yael Herer, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
124. The Defendant, Yael Herer, M.D., breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
125. The Defendant, Yael Herer, M.D., had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
126. The Defendant, Yael Herer, M.D., breached her duty of care when she failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when she failed to raise

- concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
127. The Defendant, Yael Herer, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
 128. The Defendant, Jeffrey Mito, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 129. The Defendant, Jeffrey Mito, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 130. The Defendant, Jeffrey Mito, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..
 131. The Defendant, Jeffrey Mito, M.D., had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
 132. The Defendant, Jeffrey Mito, M.D., breached his duty of care when he failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
 133. The Defendant, Jeffrey Mito, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
 134. The Defendant, Nathan Connell, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 135. The Defendant, Nathan Connell, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
 136. The Defendant, Nathan Connell, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..

137. The Defendant, Nathan Connell, M.D., had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
138. The Defendant, Nathan Connell, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
139. The Defendant, Nathan Connell, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
140. The Defendant, Kevin Giordano owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
141. The Defendant, Kevin Giordano, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
142. The Defendant, Kevin Giordano breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..
143. The Defendant, Kevin Giordano had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
144. The Defendant, Kevin Giordano breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
145. The Defendant, Kevin Giordano's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
146. The Defendant, Susan Dempsey owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
147. The Defendant, Susan Dempsey, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
148. The Defendant, Susan Dempsey breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the

auspices of providing medical care by Derrick Todd, M.D..

149. The Defendant, Susan Dempsey had a duty to hire, train, supervise, manage, oversee, credential, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
150. The Defendant, Susan Dempsey breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, credentialing, and retainment of Derrick Todd, M.D.
151. The Defendant, Susan Dempsey's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
152. The Defendant, Anthony Guidi, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
153. The Defendant, Anthony Guidi, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
154. The Defendant, Anthony Guidi, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..
155. The Defendant, Anthony Guidi, M.D., had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
156. The Defendant, Anthony Guidi, M.D., breached his duty of care when he failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
157. The Defendant, Anthony Guidi, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
158. The Defendant, Maranjely Rosario, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
159. The Defendant, Maranjely Rosario, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

160. The Defendant, Maranjely Rosario, breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..
161. The Defendant, Maranjely Rosario, had a duty to recognize when rheumatologists were acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and testing, and she had a further duty to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
162. The Defendant, Maranjely Rosario breached her duty of care when she failed to recognize Derrick Todd, M.D. was acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and testing, and she further breached her duty of care when she failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
163. The Defendant, Maranjely Rosario's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
164. The Defendants, BWH John/Jane Does #1-10, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
165. The Defendants, BWH John/Jane Does #1-10, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
166. The Defendants, BWH John/Jane Does #1-10, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
167. The Defendants, BWH John/Jane Does #1-10, had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
168. The Defendants, BWH John/Jane Does #1-10, breached their duties of care when they failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment

of Derrick Todd, M.D.

169. The Defendants, BWH John/Jane Does #1-10, had a duty to properly credential competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
170. The Defendants, BWH John/Jane Does #1-10, breached their duties of care when they improperly credentialed Derrick Todd, M.D. to perform gynecological care.
171. The Defendants, BWH John/Jane Does #1-10, had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
172. The Defendants, BWH John/Jane Does #1-10, breached their duties of care when they failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion. properly credential competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
173. The Defendants, BWH John/Jane Does #1-10, had a duty to recognize when rheumatologists were acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and testing, and she had a further duty to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
174. The Defendants, BWH John/Jane Does #1-10, breached their duties of care when they failed to recognize Derrick Todd, M.D. was acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and testing, and they further breached their duty of care when they failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting in such a fashion.
175. The Defendant, BWH John/Jane Does #1-10's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
176. The Defendants, BWH Officers and Directors John/Jane Does #1-50, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
177. The Defendants, BWH Officers and Directors John/Jane Does #1-50, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or

should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

178. The Defendants, BWH Officers and Directors John/Jane Does #1-50, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
179. The Defendants, BWH Officers and Directors John/Jane Does #1-50, had a duty to implement policies to ensure the proper and appropriate hiring, training, supervision, management, oversight, credentialing, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
180. The Defendants, BWH Officers and Directors John/Jane Does #1-50, breached their duties of care when they failed to ensure the proper and appropriate hiring, training, supervision, management, oversight, credentialing, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
181. The Defendants, BWH Officers and Directors John/Jane Does #1-50, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of hospital physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
182. The Defendants, BWH Officers and Directors John/Jane Does #1-50, breached their duties when they failed to act on information and allegations of inappropriate and potentially criminal conduct of hospital physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
183. The Defendant, BWH Officers and Directors John/Jane Does #1-50's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
184. The Defendants, BWH Faulkner John/Jane Does #1-10, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine,
185. and sexual assault and battery under the auspices of providing medical care.
186. The Defendants, BWH Faulkner John/Jane Does #1-10, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
187. The Defendants, BWH Faulkner John/Jane Does #1-10, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd,

M.D.

188. The Defendants, BWH Faulkner John/Jane Does #1-10, had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
189. The Defendants, BWH Faulkner John/Jane Does #1-10, breached their duties of care when they failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
190. The Defendants, BWH Faulkner John/Jane Does #1-10, had a duty to properly credential competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
191. The Defendants, BWH Faulkner John/Jane Does #1-10, breached their duties of care when they improperly credentialed Derrick Todd, M.D. to perform gynecological care.
192. The Defendants, BWH Faulkner John/Jane Does #1-10, had a duty to recognize when rheumatologists were submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
193. The Defendants, BWH Faulkner John/Jane Does #1-10, breached their duties of care when they failed to recognize Derrick Todd, M.D. was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when they failed to raise concerns with those in a position to intervene and stop Derrick Todd,
194. M.D. from acting in such a fashion. properly credential competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
195. The Defendants, BWH Faulkner John/Jane Does #1-10, had a duty to recognize when rheumatologists were acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and
196. testing, and she had a further duty to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
197. The Defendants, BWH Faulkner John/Jane Does #1-10, breached their duties of care when they failed to recognize Derrick Todd, M.D. was acting outside of normal and appropriate behavior, including submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, scheduling patient appointments outside of normal hours when staff was not on site, performing breast, pelvic, and rectal examinations of patients without chaperones, not submitting specimens for testing that was done, not documenting when examinations and testing was done, and not billing for examinations and testing, and they further breached their duty of care when they failed to raise concerns with those in a position to intervene and stop Derrick Todd, M.D. from acting

in such a fashion.

198. The Defendant, BWH Faulkner John/Jane Does #1-10's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
199. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
200. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
201. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
202. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, had a duty to implement policies to ensure the proper and appropriate hiring, training, supervision, management, oversight, credentialing, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
203. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, breached their duties of care when they failed to ensure the proper and appropriate hiring, training, supervision, management, oversight, credentialing, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
204. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of hospital physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
205. The Defendants, BWH Faulkner Officers and Directors John/Jane Does #1-50, breached their duties when they failed to act on information and allegations of inappropriate and potentially criminal conduct of hospital physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
206. The Defendant, BWH Faulkner Officers and Directors John/Jane Does #1-50's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.

207. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
208. The Defendant, Charles River Medical Associates, P.C., upon information and belief, at relevant times, by and through its agents, servants, and/or employees, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
209. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, including Derrick Todd, M.D., breached its duty when it allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D..
210. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
211. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, breached its duty of care when it failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
212. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
213. The Defendant, Charles River Medical Associates, P.C., by and through its agents, servants, and/or employees, breached its duty when it failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical
214. Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
215. The Defendant, Charles River Medical Associates, P.C.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
216. The Defendant, Joseph Harrington, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
217. The Defendant, Joseph Harrington, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the

unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

218. The Defendant, Joseph Harrington, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
219. The Defendant, Joseph Harrington, M.D., had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
220. The Defendant, Joseph Harrington, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
221. The Defendant, Joseph Harrington, M.D., had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
222. The Defendant, Joseph Harrington, M.D., breached his duty when he failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
223. The Defendant, Joseph Harrington, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
224. The Defendant, Vinay Kumar, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
225. The Defendant, Vinay Kumar, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
226. The Defendant, Vinay Kumar, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
227. The Defendant, Vinay Kumar, M.D., had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
228. The Defendant, Vinay Kumar, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of

Derrick Todd, M.D.

229. The Defendant, Vinay Kumar, M.D., had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
230. The Defendant, Vinay Kumar, M.D., breached his duty when he failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
231. The Defendant, Vinay Kumar, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
232. The Defendant, Paige Meisheid, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
233. The Defendant, Paige Meisheid, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
234. The Defendant, Paige Meisheid, M.D., breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
235. The Defendant, Paige Meisheid, M.D., had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
236. The Defendant, Paige Meisheid, M.D., breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
237. The Defendant, Paige Meisheid, M.D., had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
238. The Defendant, Paige Meisheid, M.D., breached her duty when she failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.

239. The Defendant, Paige Meisheid, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
240. The Defendant, Douglas Gronda, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
241. The Defendant, Douglas Gronda, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
242. The Defendant, Douglas Gronda, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
243. The Defendant, Douglas Gronda, M.D., had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
244. The Defendant, Douglas Gronda, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
245. The Defendant, Douglas Gronda, M.D., had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
246. The Defendant, Douglas Gronda, M.D., breached his duty when he failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
247. The Defendant, Douglas Gronda, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
248. The Defendant, Vincent Yuan, M.D., owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
249. The Defendant, Vincent Yuan, M.D., upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

250. The Defendant, Vincent Yuan, M.D., breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
251. The Defendant, Vincent Yuan, M.D., had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
252. The Defendant, Vincent Yuan, M.D., breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
253. The Defendant, Vincent Yuan, M.D., had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
254. The Defendant, Vincent Yuan, M.D., breached his duty when he failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
255. The Defendant, Vincent Yuan, M.D.'s conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
256. The Defendant, Brian Parillo, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
257. The Defendant, Brian Parillo, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
258. The Defendant, Brian Parillo, breached his duty when he allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
259. The Defendant, Brian Parillo, had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
260. The Defendant, Brian Parillo, breached his duty of care when he failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.

261. The Defendant, Brian Parillo, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
262. The Defendant, Brian Parillo, breached his duty when he failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
263. The Defendant, Brian Parillo's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
264. The Defendant, Anna Goulet, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
265. The Defendant, Anna Goulet, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
266. The Defendant, Anna Goulet, breached her duty when she allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
267. The Defendant, Anna Goulet, had a duty to hire, train, supervise, manage, oversee, and retain competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
268. The Defendant, Anna Goulet, breached her duty of care when she failed to take reasonable steps in the hiring, training, supervising, managing, oversight, and retainment of Derrick Todd, M.D.
269. The Defendant, Anna Goulet, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
270. The Defendant, Anna Goulet, breached her duty when she failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates, P.C. physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
271. The Defendant, Anna Goulet's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.

272. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
273. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
274. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
275. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, had a duty to implement policies to ensure the proper and appropriate hiring, training, supervision, management, oversight, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
276. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, breached their duties of care when they failed to ensure the proper and appropriate hiring, training, supervision, management, oversight, and retainment of competent medical providers who refrained from sexual assault and battery and inappropriate examinations of patients.
277. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, had a duty to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
278. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10, breached their duties when they failed to act on information and allegations of inappropriate and potentially criminal conduct of Charles River Medical Associates physicians acting purportedly under the guise of providing medical care but who instead were engaged in sexual assault and battery and inappropriate examinations of patients.
279. The Defendants, Charles River Medical Associates, P.C. Officers and Directors John/Jane Does #1-10's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
280. The Defendants, Primary Care Physician John/Jane Does #1-225, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.

281. The Defendants, Primary Care Physician John/Jane Does #1-225, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
282. The Defendants, Primary Care Physician John/Jane Does #1-225, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.
283. The Defendants, Primary Care Physician John/Jane Does #1-225, had a duty to communicate with specialists providing care in their respective specialties to patients of the Primary Care Physician, and to review office notes from specialists and test results ordered by specialists, and to recognize irregularities such as when rheumatologists were performing breast examinations or pelvic examinations and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and further to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
284. The Defendants, Primary Care Physician John/Jane Does #1-225, breached their duty of care when they failed to review office notes and test results ordered by Derrick Todd, M.D., and failed to recognize irregularities including that Derrick Todd, M.D. was performing breast examinations and/or pelvic examinations and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and further failed to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
285. The Defendants, Primary Care Physician John/Jane Does #1-225's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
286. The Defendants, Gynecologist John/Jane Does #1-225, owed patients a duty of care to remain free from inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
287. The Defendants, Gynecologist John/Jane Does #1-225, upon information and belief, at relevant times, had actual and/or constructive knowledge, and therefore knew, or should have known, about Derrick Todd, M.D.'s conduct in performing inappropriate bodily examinations, the unauthorized practice of medicine, and sexual assault and battery under the auspices of providing medical care.
288. The Defendants, Gynecologist John/Jane Does #1-225, breached their duties when they allowed for inappropriate bodily examinations of patients by Derrick Todd, M.D., the unauthorized practice of gynecological medicine by Derrick Todd, M.D., and the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.

289. The Defendants, Gynecologist John/Jane Does #1-225, had a duty to communicate with other specialists and Primary Care Physicians, and to recognize irregularities such as when rheumatologists were performing breast examinations or pelvic examinations and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and further to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
290. The Defendants, Gynecologist John/Jane Does #1-225, breached their duty of care when they failed to recognize irregularities including that Derrick Todd, M.D. was performing breast examinations and/or pelvic examinations and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and further failed to raise concerns with those in a position to intervene and stop any rheumatologist acting in such a fashion.
291. The Defendants, Gynecologist John/Jane Does #1-225's conduct and behavior constitutes an unfair or deceptive act or practice within the meaning and definition of G.L. c. 93A.
292. The deliberate and negligent acts of the Defendants have caused and continue to cause the Plaintiffs to suffer severe and permanent injuries, including emotional distress.
293. Beginning as far back as 2010, and continuing through 2023, Derrick Todd, M.D. performed inappropriate and unauthorized breast, pelvic, rectal, and in some cases testicular examinations on his rheumatology patients.
294. These rheumatology patients were subjected to inappropriate, unnecessary, and unauthorized breast, pelvic, rectal, and in some cases testicular examinations by Derrick Todd, M.D. under the auspices of providing medical care, but in reality, for his own sexual gratification.
295. These former patients of Derrick Todd, M.D. are struggling to understand and cope with the injustices they endured, the traumas they experienced, and the long-lasting impact this harm has caused to their personal and family lives, and their relationships with medical providers.

COUNT I (Negligence: Derrick Todd, M.D)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Derrick Todd, M.D., including, but not limited to, as follows:
 - a. defendant's negligent practice of medicine in practicing outside of his specialty, in performing medically unnecessary examinations and in the care and treatment of his patients' actual medical conditions
 - b. defendant's negligent failure to protect his patients from inappropriate bodily examinations;
 - c. defendant's negligent failure to protect his patients from the unauthorized practice of medicine;

- d. defendant's negligent failure to protect his patients from sexual assault and battery under the auspices of providing medical care;
 - e. defendant's negligent failure to refrain from committing sexual assault and battery under the auspices of providing medical care
 - f. defendant's negligent grooming of patients by winning their trust and then violating that trust for his own personal pleasure;
 - g. defendant's negligent misrepresentations that he was a competent and qualified doctor with the proper skill and expertise and training to perform various examinations and therapies;
 - h. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - i. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct:
 - j. defendant's failure to provide proper and adequate medical care to his patients; and
 - k. defendant's failure to adequately assure appropriate and continued medical care to patients during and after his conduct resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Derrick Todd, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT II (Negligent Infliction of Emotional Distress: Derrick Todd, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Derrick Todd, M.D., including, but not limited to, as follows:
 - a. defendant's negligent practice of medicine in practicing outside of his specialty, in performing medically unnecessary examinations and in the care and treatment of his

- patients' actual medical conditions;
- b. defendant's negligent failure to protect his patients from inappropriate bodily examinations;
 - c. defendant's negligent failure to protect his patients from the unauthorized practice of medicine;
 - d. defendant's negligent failure to protect his patients from sexual assault and battery under the auspices of providing medical care;
 - e. defendant's negligent failure to refrain from committing sexual assault and battery under the auspices of providing medical care
 - f. defendant's negligent grooming of patients by winning their trust and then violating that trust for his own personal pleasure;
 - g. defendant's negligent misrepresentations that he was a competent and qualified doctor with the proper skill and expertise and training to perform various examinations and therapies;
 - h. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - i. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct;
 - j. defendant's failure to provide proper and adequate medical care to his patients; and
 - k. defendant's failure to adequately assure appropriate and continued medical care to patients during and after his conduct resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Derrick Todd, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT III (Intentional Infliction of Emotional Distress: Derrick Todd, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.

2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the extreme and outrageous conduct of the defendant, Derrick Todd, M.D., including, but not limited to, as follows:
 - a. defendant's performance of inappropriate bodily examinations;
 - b. defendant's unauthorized practice of gynecological medicine;
 - c. defendant's sexual assault and battery on his patients under the auspices of providing medical care;
 - d. defendant's grooming of patients by winning their trust and then violating that trust for his own personal pleasure;
 - e. defendant's misrepresentations that he was a competent and qualified doctor with the proper skill and expertise and training to perform various examinations and therapies;
 - f. defendant's ignoring that reasonable persons under the circumstances of the Plaintiffs would likely suffer emotional distress;
 - g. defendant's ignoring the likelihood of the injury and harm to the Plaintiffs as a result of his conduct;
 - h. defendant's ignoring that his conduct was extreme and outrageous and would likely result in injury and harm including emotional distress to the Plaintiffs;
 - i. defendant's failure to provide proper and adequate medical care to his patients;
and
 - j. defendant's failure to adequately assure appropriate and continued medical care to patients during and after his conduct resulting in patient abandonment.

3. As a direct and proximate result of the deliberate conduct of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs, pray judgment against the defendant, Derrick Todd, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT IV (Sexual Assault and Battery: Derrick Todd, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the actions of the defendant, Derrick Todd, M.D., including, but not limited to, as follows:
 - a. defendant’s grooming of patients by winning their trust and then violating that trust for his own personal pleasure;
 - b. defendant’s harmful and offensive touching, including sexual assault, under the auspices of providing medical care; and
 - c. defendant’s performance of inappropriate bodily examinations;
3. As a direct and proximate result of the extreme and outrageous conduct of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Derrick Todd, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT V (Violations of M.G.L. c. 93A: Derrick Todd, M.D.)

Reserved.

COUNT VI (Negligence: The Brigham and Women’s Hospital, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, The Brigham and Women’s Hospital, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily touching and examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;

- c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, credentialing, overseeing and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when The Brigham and Women's Hospital, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - h. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, The Brigham and Women's Hospital, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT VII (Negligent Infliction of Emotional Distress: The Brigham and Women's Hospital, Inc.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, The Brigham and Women's Hospital, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:

- a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when The Brigham and Women's Hospital, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;
 - i. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have required and will require significant medical/mental health treatment; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, The Brigham and Women's Hospital, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT VIII (Violations of M.G.L. c. 93A: The Brigham and Women's Hospital, Inc.)

Reserved.

COUNT IX (Negligence: Brigham and Women's Faulkner Hospital, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Brigham and Women's Faulkner Hospital, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, credentialing, overseeing and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brigham and Women's Faulkner Hospital, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - h. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required

and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brigham and Women's Faulkner Hospital, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT X (Negligent Infliction of Emotional Distress: Brigham and Women's Faulkner Hospital, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Brigham and Women's Faulkner Hospital, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brigham and Women's Faulkner Hospital, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;

- i. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brigham and Women's Faulkner Hospital, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XI (Violations of M.G.L. c. 93A: Brigham and Women's Faulkner Hospital, Inc.)

Reserved.

COUNT XII (Negligence: Brigham and Women's Physicians Organization, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Brigham and Women's Physicians Organization, Inc. by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, credentialing, overseeing and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s

predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brigham and Women's Physicians Organization, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - h. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brigham and Women's Physicians Organization, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XIII (Negligent Infliction of Emotional Distress: Brigham and Women's Physicians Organization, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Brigham and Women's Physicians Organization, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;

- d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brigham and Women's Physicians Organization, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;
 - i. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brigham and Women's Physicians Organization, Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XIV (Violations of M.G.L. c. 93A: Brigham and Women's Physicians Organization, Inc.)

Reserved.

COUNT XV (Negligence: Mass General Brigham Community Physicians. Inc.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth

here in their entirety.

2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Mass General Brigham Community Physicians. Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, credentialing, overseeing and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Mass General Brigham Community Physicians. Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - h. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Mass General Brigham Community Physicians. Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XVI (Negligent Infliction of Emotional Distress: Mass General Brigham Community Physicians, Inc.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Mass General Brigham Community Physicians, Inc., by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Mass General Brigham Community Physicians, Inc. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;
 - i. defendant’s negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd’s conduct; and

- j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Mass General Brigham Community Physicians. Inc., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XVII (Violations of M.G.L. c. 93A: Mass General Brigham Community Physicians. Inc.)

Reserved.

COUNT XVIII (Negligence: Mass General Brigham Incorporated)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Mass General Brigham Incorporated, by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, credentialing, overseeing and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice

medicine;

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Mass General Brigham Incorporated had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - h. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Mass General Brigham Incorporated, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XIX (Negligent Infliction of Emotional Distress: Mass General Brigham Incorporated)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Mass General Brigham Incorporated, by and through its agents, servants, and employees, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;

- d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Mass General Brigham Incorporated had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;
 - i. defendant's negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd's conduct; and
 - j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Mass General Brigham Incorporated, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XX (Violations of M.G.L. c. 93A: Mass General Brigham Incorporated)

Reserved.

COUNT XXI (Negligence: Charles Morris, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth

here in their entirety.

2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Charles Morris, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles Morris, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles Morris, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXII (Negligent Infliction of Emotional Distress: Charles Morris, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Charles Morris, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily

examinations of patients by Derrick Todd, M.D.;

- b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles Morris, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles Morris, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXIII (Violations of M.G.L. c. 93A: Charles Morris, M.D.)

Reserved.

COUNT XXIV (Negligence: Scott Lewis Schissel, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Scott Lewis Schissel, M.D., including, but not limited to, as follows:

- a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Scott Lewis Schissel, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Scott Lewis Schissel, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXV (Negligent Infliction of Emotional Distress: Scott Lewis Schissel, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Scott Lewis Schissel, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of

gynecological medicine by Derrick Todd, M.D.;

- c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Scott Lewis Schissel, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Scott Lewis Schissel, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXVI (Violations of M.G.L. c. 93A: Scott Lewis Schissel, M.D.)

Reserved.

COUNT XXVII (Negligence: Sonali Desai, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Sonali Desai, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily

- b. examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Sonali Desai, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Sonali Desai, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXVIII (Negligent Infliction of Emotional Distress: Sonali Desai, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Sonali Desai, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;

- d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Sonali Desai, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Sonali Desai, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXIX (Violations of M.G.L. c. 93A: Sonali Desai, M.D.)

Reserved.

COUNT XXX (Negligence: Joseph Loscalzo, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Joseph Loscalzo, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;

- c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Joseph Loscalzo, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Joseph Loscalzo, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXI (Negligent Infliction of Emotional Distress: Joseph Loscalzo, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Joseph Loscalzo, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;

- e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Joseph Loscalzo, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Joseph Loscalzo, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXII (Violations of M.G.L. c. 93A: Joseph Loscalzo, M.D.)

Reserved.

COUNT XXXIII (Negligence: Ellen Gravallese, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Ellen Gravallese, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;

- d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Ellen Gravallese, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Ellen Gravallese, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXIV (Negligent Infliction of Emotional Distress: Ellen Gravallese, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Ellen Gravallese, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s

predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Ellen Gravallese, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Ellen Gravallese, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXV (Violations of M.G.L. c. 93A: Ellen Gravallese, M.D.)

Reserved.

COUNT XXXVI (Negligence: Thomas Sequist, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Thomas Sequist, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;

- e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Thomas Sequist, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Thomas Sequist, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXVII (Negligent Infliction of Emotional Distress: Thomas Sequist, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Thomas Sequist, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s

predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Thomas Sequist, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Thomas Sequist, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XXXVIII (Violations of M.G.L. c. 93A: Thomas Sequist, M.D.)

Reserved.

COUNT XXXIX (Negligence: Susan Ritter, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Susan Ritter, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;

- e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Susan Ritter, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Susan Ritter, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XL (Negligent Infliction of Emotional Distress: Susan Ritter, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Susan Ritter, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Susan Ritter, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Susan Ritter, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XLI (Violations of M.G.L. c. 93A: Susan Ritter, M.D.)

Reserved.

COUNT XLII (Negligence: David Louis, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, David Louis, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.; and
 - d. defendant's negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in

such a fashion.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, David Louis, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XLIII (Negligent Infliction of Emotional Distress: David Louis, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, David Louis, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - e. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - f. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with

other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, David Louis, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XLIV (Violations of M.G.L. c. 93A: David Louis, M.D.)

Reserved.

COUNT XLV (Negligence: Yael Herer, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Yael Herer, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.; and
 - d. defendant’s negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Yael Herer, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XLVI (Negligent Infliction of Emotional Distress: Yael Herer, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Yael Herer, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - e. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - f. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Yael Herer, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XLVII (Violations of M.G.L. c. 93A: Yael Herer, M.D.)

Reserved.

COUNT XLVIII (Negligence: Jeffrey Mito, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.

2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Jeffrey Mito, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.; and
 - d. defendant's negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Jeffrey Mito, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT II (Negligent Infliction of Emotional Distress: Jeffrey Mito, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.

2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Jeffrey Mito, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in failing to recognize Derrick Todd, M.D., was

submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;

- e. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - f. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Jeffrey Mito, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT L (Violations of M.G.L. c. 93A: Jeffrey Mito, M.D.)

Reserved.

COUNT LI (Negligence: Nathan Connell, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Nathan Connell, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice

medicine; and

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Nathan Connell, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Nathan Connell, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LII (Negligent Infliction of Emotional Distress: Nathan Connell, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Nathan Connell, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Nathan Connell, M.D.

- had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
- g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Nathan Connell, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LIH (Violations of M.G.L. c. 93A: Nathan Connell, M.D.)

Reserved.

COUNT LIV (Negligence: Kevin Giordano)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Kevin Giordano, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and

- f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Kevin Giordano had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Kevin Giordano, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LV (Negligent Infliction of Emotional Distress: Kevin Giordano)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Kevin Giordano, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Kevin Giordano had actual and constructive notice/knowledge of his predatory behavior and

inappropriate conduct in his purported practice of medicine;

- g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Kevin Giordano, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LVI (Violations of M.G.L. c. 93A: Kevin Giordano)

Reserved.

COUNT LVII (Negligence: Susan Dempsey)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Susan Dempsey, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the

Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Susan Dempsey had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Susan Dempsey, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LVIII (Negligent Infliction of Emotional Distress: Susan Dempsey)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Susan Dempsey, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining of Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Susan Dempsey had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of

the Plaintiffs would likely suffer injury and harm including emotional distress; and

- h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Susan Dempsey, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LIX (Violations of M.G.L. c. 93A: Susan Dempsey)

Reserved.

COUNT LX (Negligence: Anthony Guidi, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Anthony Guidi, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.; and
 - d. defendant's negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when he failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to

sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Anthony Guidi, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXI (Negligent Infliction of Emotional Distress: Anthony Guidi, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Anthony Guidi, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - e. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - f. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Anthony Guidi, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXII (Violations of M.G.L. c. 93A: Anthony Guidi, M.D.)

Reserved.

COUNT LXIII (Negligence: Maranjely Rosario)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiff are the direct and proximate result of the negligence of the defendant, Maranjely Rosario, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.; and
 - g. defendant’s negligent behavior in scheduling patient appointments and coordinating testing and failing to recognize unusual behavior and conduct by Derrick Todd, M.D., in scheduling appointments early in the morning or late in the evening when regular staff was not on site, and failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant Maranjely Rosario, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXIV (Negligent Infliction of Emotional Distress: Maranjely Rosario)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.

2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Maranjely Rosario, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in scheduling patient appointments and coordinating testing and failing to recognize unusual behavior and conduct by Derrick Todd, M.D., in scheduling appointments early in the morning or late in the evening when regular staff was not on site, and failing to recognize Derrick Todd, M.D., was submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - e. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - f. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Maranjely Rosario, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXV (Violations of M.G.L. c. 93A: Maranjely Rosario)

Reserved.

COUNT LXVI (Negligence: BWH John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth

here in their entirety.

2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, BWH John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXVII (Negligent Infliction of Emotional Distress: BWH John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.

2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, BWH John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXVIII (Violations of M.G.L. c. 93A: BWH John/Jane Does #1-10)

Reserved.

COUNT LXIX (Negligence: BWH Officers and Directors John/Jane Does #1-50)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, BWH Officers and Directors John/Jane Does #1-50, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Officers and Directors John/Jane Does #1-50 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Officers and Directors John/Jane Does #1-50, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXX (Negligent Infliction of Emotional Distress: BWH Officers and Directors John/Jane Does #1-50)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth

here in their entirety.

2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, BWH Officers and Directors John/Jane Does #1-50, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine;
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Officers and Directors John/Jane Does #1-50 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Officers and Directors John/Jane Does #1-50, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXI (Violations of M.G.L. c. 93A: BWH Officers and Directors John/Jane Does #1-50)

Reserved.

COUNT LXXII (Negligence: BWH Faulkner John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, BWH Faulkner John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Faulkner John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Faulkner John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXIII (Negligent Infliction of Emotional Distress: BWH Faulkner John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, BWH Faulkner John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Faulkner John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Faulkner John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXIV (Violations of M.G.L. c. 93A: BWH Faulkner John/Jane Does #1-10)

Reserved.

COUNT LXXV (Negligence: BWH Faulkner Officers and Directors John/Jane Does #1-50)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, BWH Faulkner Officers and Directors John/Jane Does #1-50, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Faulkner Officers and Directors John/Jane Does #1-50 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Faulkner Officers and Directors John/Jane Does #1-50, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXVI (Negligent Infliction of Emotional Distress: BWH Faulkner Officers and

Directors John/Jane Does #1-50)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, BWH Faulkner Officers and Directors John/Jane Does #1-50, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when BWH Faulkner Officers and Directors John/Jane Does #1-50 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, BWH Faulkner Officers and Directors John/Jane Does #1-50, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

**COUNT LXXVII (Violations of M.G.L. c. 93A: BWH Faulkner Officers and Directors
John/Jane Does #1-50)**

Reserved.

COUNT LXXVIII (Negligence: Charles River Medical Associates, P.C.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Charles River Medical Associates, P.C., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles River Medical Associates, P.C., had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd’s conduct; and
 - h. defendant’s negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs, were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have

sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles River Medical Associates, P.C., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXIX (Negligent Infliction of Emotional Distress: Charles River Medical Associates, P.C.)

1. The Plaintiff repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Charles River Medical Associates, P.C., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles River Medical Associates, P.C. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress;
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct;
 - i. defendant’s negligent failure to adequately assure continued and proper medical care to patients during and after Dr. Todd’s conduct; and

- j. defendant's negligent failure to provide proper and adequate medical care to patients of Dr. Todd following his cessation of seeing patients, resulting in patient abandonment.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; have suffered and will continue to suffer patient abandonment and delayed treatment of their underlying medical conditions with associated physical and mental pain and anguish; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles River Medical Associates, P.C., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXX (Violations of M.G.L. c. 93A: Charles River Medical Associates, P.C.)

Reserved.

COUNT LXXXI (Negligence: Joseph Harrington, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Joseph Harrington, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the

Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Joseph Harrington, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Joseph Harrington, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXII (Negligent Infliction of Emotional Distress: Joseph Harrington, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Joseph Harrington, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Joseph Harrington, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;

- g. defendant's failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Joseph Harrington, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXIII (Violations of M.G.L. c. 93A: Joseph Harrington, M.D.)

Reserved.

COUNT LXXXIV (Negligence: Vinay Kumar, M.D.)

- 1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
- 2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Vinay Kumar, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or

otherwise investigate and intervene to protect patients when Vinay Kumar, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Vinay Kumar, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXV (Negligent Infliction of Emotional Distress: Vinay Kumar, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Vinay Kumar, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Vinay Kumar, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and

- h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Vinay Kumar, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXVI (Violations of M.G.L. c. 93A: Vinay Kumar, M.D.)

Reserved.

COUNT LXXXVII (Negligence: Paige Meisheid, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Paige Meisheid, M.D., including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant's negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.'s predatory practices, and concerns about Derrick Todd, M.D.'s fitness to practice medicine; and
 - f. defendant's negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Paige Meisheid, M.D. had actual and constructive notice/knowledge of his predatory behavior and

inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Paige Meisheid, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXVIII (Negligent Infliction of Emotional Distress: Paige Meisheid, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Paige Meisheid, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Paige Meisheid, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a

result of his conduct.

3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Paige Meisheid, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT LXXXIX (Violations of M.G.L. c. 93A: Paige Meisheid, M.D.)

Reserved.

COUNT XC (Negligence: Douglas Gronda, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Douglas Gronda, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Douglas Gronda, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Douglas Gronda, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCI (Negligent Infliction of Emotional Distress: Douglas Gronda, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Douglas Gronda, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Douglas Gronda, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.

3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Douglas Gronda, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCII (Violations of M.G.L. c. 93A: Douglas Gronda, M.D.)

Reserved.

COUNT XCIII (Negligence: Vincent Yuan, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Vincent Yuan, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Vincent Yuan, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Vincent Yuan, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCIV (Negligent Infliction of Emotional Distress: Vincent Yuan, M.D.)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Vincent Yuan, M.D., including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Vincent Yuan, M.D. had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.

3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Vincent Yuan, M.D., in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCV (Violations of M.G.L. c. 93A: Vincent Yuan, M.D.)

Reserved.

COUNT XCVI (Negligence: Brian Parillo)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Brian Parillo, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brian Parillo had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brian Parillo, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCVII (Negligent Infliction of Emotional Distress: Brian Parillo)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Brian Parillo, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Brian Parillo had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.

3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Brian Parillo, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT XCVIII (Violations of M.G.L. c. 93A: Brian Parillo)

Reserved.

COUNT IC (Negligence: Anna Goulet)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Anna Goulet, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Anna Goulet had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries,

including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Anna Goulet, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT C (Negligent Infliction of Emotional Distress: Anna Goulet)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Anna Goulet, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Anna Goulet had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - h. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.

3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Anna Goulet, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CI (Violations of M.G.L. c. 93A: Anna Goulet)

Reserved.

COUNT CII (Negligence: Charles River Medical Associates John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiffs are the direct and proximate result of the negligence of the defendant, Charles River Medical Associates John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine; and
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles River Medical Associates John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine.

3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles River Medical Associates John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CIII (Negligent Infliction of Emotional Distress: Charles River Medical Associates John/Jane Does #1-10)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Charles River Medical Associates John/Jane Does #1-10, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in discounting or ignoring patient and staff complaints, and failing to act on information regarding Derrick Todd, M.D.’s predatory practices, and concerns about Derrick Todd, M.D.’s fitness to practice medicine;
 - f. defendant’s negligent failure to take action to report Derrick Todd, M.D. to the Board of Registration in Medicine, suspend Dr. Todd from seeing patients, or otherwise investigate and intervene to protect patients when Charles River Medical Associates John/Jane Does #1-10 had actual and constructive notice/knowledge of his predatory behavior and inappropriate conduct in his purported practice of medicine;
 - g. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and

- h. defendant's failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of his conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Charles River Medical Associates John/Jane Does #1-10, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CIV (Violations of M.G.L. c. 93A: Charles River Medical Associates John/Jane Does #1-10)

Reserved.

COUNT CV (Negligence: Primary Care Physician John/Jane Doe)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the "Parties" and "Facts Common to all Counts" section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiff are the direct and proximate result of the negligence of the defendant, Primary Care Physician John/Jane Doe, including, but not limited to, as follows:
 - a. defendant's negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant's negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant's negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant's negligent behavior in hiring, training, supervising, managing, overseeing, credentialing, and retaining Derrick Todd, M.D.; and
 - i. defendant's negligent behavior in failing to recognize unusual behavior and conduct by Derrick Todd, M.D., and failing to recognize Derrick Todd, M.D., was performing breast, pelvic and rectal examinations, and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries,

including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant Primary Care Physician John/Jane Doe, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CVI (Negligent Infliction of Emotional Distress: Primary Care Physician John/Jane Doe)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Primary Care Physician John/Jane Doe, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in failing to recognize unusual behavior and conduct by Derrick Todd, M.D., and failing to recognize Derrick Todd, M.D., was performing breast, pelvic and rectal examinations, and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - f. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - g. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills

resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Primary Care Physician John/Jane Doe, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CVII (Violations of M.G.L. c. 93A: Primary Care Physician John/Jane Doe)

Reserved.

COUNT CVIII (Negligence: Gynecologist John/Jane Doe)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The injuries sustained by the Plaintiff are the direct and proximate result of the negligence of the defendant, Gynecologist John/Jane Doe, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.; and
 - h. defendant’s negligent behavior in failing to recognize unusual behavior and conduct by Derrick Todd, M.D., and failing to recognize Derrick Todd, M.D., was performing breast, pelvic and rectal examinations, and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion.
3. As a direct and proximate result of the carelessness, inattention and negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent personal injuries, including sexual assault; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant Gynecologist John/Jane Doe, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CIX (Negligent Infliction of Emotional Distress: Gynecologist John/Jane Doe)

1. The Plaintiffs repeat and reaver fully herein the allegations contained in Paragraphs in the “Parties” and “Facts Common to all Counts” section of this complaint as if each were set forth here in their entirety.
2. The emotional distress sustained by the Plaintiffs is the direct and proximate result of the negligence of the defendant, Gynecologist John/Jane Doe, including, but not limited to, as follows:
 - a. defendant’s negligent failure to keep patients free from inappropriate bodily examinations of patients by Derrick Todd, M.D.;
 - b. defendant’s negligent failure to keep patients free from the unauthorized practice of gynecological medicine by Derrick Todd, M.D.;
 - c. defendant’s negligent failure to keep patients free from the sexual assault and battery of patients under the auspices of providing medical care by Derrick Todd, M.D.;
 - d. defendant’s negligent behavior in hiring, training, supervising, managing, overseeing, credentialling, and retaining Derrick Todd, M.D.;
 - e. defendant’s negligent behavior in failing to recognize unusual behavior and conduct by Derrick Todd, M.D., and failing to recognize Derrick Todd, M.D., was performing breast, pelvic and rectal examinations, and submitting specimens for laboratory testing, including PAP smears, that were inconsistent and not part of rheumatological care, and when the defendant failed to raise concerns with those in a position to intervene and stop Dr. Todd from acting in such a fashion;
 - f. defendant’s failure to appreciate that reasonable persons under the circumstances of the Plaintiffs would likely suffer injury and harm including emotional distress; and
 - g. defendant’s failure to appreciate the foreseeability of the injury to the Plaintiffs as a result of its conduct.
3. As a direct and proximate result of the negligence of the defendant, the Plaintiffs were caused and will be caused to sustain severe and permanent emotional distress; have suffered and will continue to suffer great pain of body and anguish of mind; have been and will continue to be unable to pursue normal activities; have sustained and will continue to sustain medical bills resulting from their injuries; have required and will require significant medical/mental health treatment; have sustained and will continue to sustain adverse trust issues for medical care with other medical providers; and their abilities to enjoy their lives have been adversely affected.

WHEREFORE, the Plaintiffs pray judgment against the defendant, Gynecologist John/Jane Doe, in an amount that is just and appropriate to compensate them for their injuries, together with interest and costs.

COUNT CX (Violations of M.G.L. c. 93A: Gynecologist John/Jane Doe)

Reserved.

PLAINTIFFS CLAIM TRIAL BY JURY.

Respectfully submitted,
The plaintiffs,
By their attorneys,

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