

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

BRENDA JOYCE,)
Individually and as Special Administrator of the)
Estate of MARIA E. RODRIGUEZ, Deceased,)
)
Plaintiff,)

vs.)

No.)

EDWARD STEVE LICHTENBERG, M.D. and)
FAMILY PLANNING ASSOCIATES)
MEDICAL GROUP, LTD., an Illinois)
Corporation,)
)
Defendants.)

JULY 11 2000

COMPLAINT AT LAW

NOW COMES the plaintiff, Brenda Joyce, individually and as Special Administrator of the Estate of Maria E. Rodriguez, deceased, by and through her attorneys, Howard & Nemoy, and complaining of the defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., an Illinois corporation, and each of them, states as follows:

COUNT I (Wrongful Death)

1. The plaintiff, Brenda Joyce, brings this action as Special Administrator pursuant to and as authorized by 740 ILCS 180/2.1.

2. On March 25, 2000, and for a long time prior thereto, the defendant, Edward Steve Lichtenberg, M.D., was, and still is, a physician duly licensed to practice medicine as provided by the laws of the State of Illinois and was engaged in the practice of his profession performing pregnancy termination procedures at the facilities of the defendant, Family Planning Associates Medical Group, Ltd., an Illinois corporation, in Chicago, Illinois.

3. On March 25, 2000, and for a long time prior thereto, the defendant, Family Planning Associates Medical Group, Ltd., was an Illinois corporation that owned, operated, managed, maintained and controlled a certain ambulatory surgery center located in Chicago,

plans to transfer her to a hospital.

9. By the time decedent arrived at Rush-Presbyterian-St. Luke's Medical Center, she was exhibiting signs of hemodynamic shock and despite efforts to save her she died later that evening of massive vaginal hemorrhage due to perforation of the uterus and uterine atony.

10. The defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., and each of them in performing the pregnancy termination procedure upon the plaintiff's decedent and attempting to manage her post-operative complications failed to use the skill and care ordinarily used by a reasonably well-qualified physician who performs second trimester abortion procedures, in one or more of the following respects:

- (a) Carelessly and negligently failed to recognize the perforation of decedent's uterus as the cause of her vaginal hemorrhage;
- (b) Carelessly and negligently failed to administer appropriate pharmacological agents, such as pitocin, methergine or prostaglandins, to control the decedent's hemorrhage;
- (c) Carelessly and negligently failed to administer blood to the decedent to prevent exsanguination;
- (d) Carelessly and negligently failed to intervene surgically to stop decedent's bleeding when the opportunity presented itself; and
- (e) Carelessly and negligently failed to recognize the severity of decedent's bleeding and transfer her in a timely manner to a hospital capable of providing the critical and intensive care that she so desperately needed.

11. The death of the plaintiff's decedent on March 25, 2000, as aforesaid, was a direct and proximate result of one or more of the aforesaid wrongful acts of the defendants.

12. The decedent left surviving her, Mia Maria Rodriguez, her four year old daughter, who is living and who has sustained pecuniary loss by virtue of her mother's death, including, but not limited to, the loss of her mother's love, guidance, comfort, support, direction, companionship and society.

WHEREFORE, the plaintiff, Brenda Joyce, as Special Administrator of the Estate of Maria E. Rodriguez, deceased, demands judgment against the defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., an Illinois corporation, and each of them, for damages in excess of \$50,000.00, plus the costs of this action.

COUNT II (Survival)

1-10. Plaintiff repeats and realleges Paragraphs 1-10 of COUNT I of this complaint as Paragraphs 1-10 of this COUNT II, as if fully set forth herein.

11. The death of the plaintiff's decedent on March 25, 2000 from massive vaginal hemorrhage due to uterine perforation and atony, as aforesaid, was a direct and proximate result of one or more of the aforesaid wrongful acts of the defendants. However, before she died decedent did suffer and endure conscious pain and suffering as well as total disability. In addition thereto, decedent was prevented from attending to the normal and usual affairs of her daily life and was deprived of significant earnings and income she would otherwise have generated. This action for recovery of these damages has, pursuant to 755 ILCS 5/27-6, survived decedent's death and plaintiff, as her duly authorized representative, hereby asserts her claim for them.

WHEREFORE, the plaintiff, Brenda Joyce, as Special Administrator of the Estate of Maria E. Rodriguez, deceased, demands judgment against the defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., an Illinois corporation, and each of them, for damages in excess of \$50,000.00, plus the costs of this action.

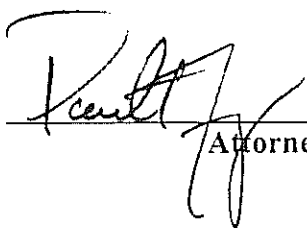
COUNT III (Family Expense Claim)

1-11. Plaintiff repeats and realleges Paragraphs 1-11 of COUNT I of this complaint as Paragraphs 1-11 of this COUNT III, as if fully set forth herein.

12. That as a direct and proximate result of the negligence of the defendants, and each of them, decedent's estate suffered damages for the medical expenses incurred during the

unsuccessful efforts to save her at Rush-Presbyterian-St. Luke's Medical Center and the expenses of decedent's funeral and burial. Plaintiff now brings this action, pursuant to 750 ILCS 65/15, to collect those damages.

WHEREFORE, the plaintiff, Brenda Joyce, individually and as Special Administrator of the Estate of Maria E. Rodriguez, deceased, demands judgment against the defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., an Illinois corporation, and each of them, for damages in excess of \$50,000.00, plus the costs of this action.



Attorney for Plaintiff

HOWARD & NEMOY
Attorneys for Plaintiff
35 East Wacker Drive, Suite 250
Chicago, Illinois 60601
312-782-7120
#36074

STATE OF ILLINOIS)
)
COUNTY OF COOK) ss.

AFFIDAVIT

PAUL I. NEMOY, being first duly sworn, states:

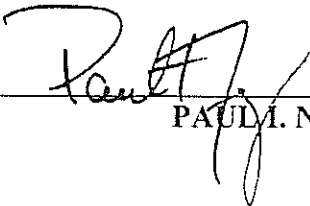
1. That I am the one of the attorneys of record for the plaintiff, Brenda Joyce, Special Administrator of the Estate of Elizabeth E. Rodriguez, deceased.

2. That the within cause of action alleges wrongful death and other personal injuries sustained as a result of the medical negligence of the defendants, against Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd.

3. That your affiant hereby asserts that the total of money damages sought through the within action exceeds \$50,000.00.

Further, your affiant sayeth not.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



PAUL I. NEMOY

HOWARD & NEMOY
Attorneys for Plaintiff
35 East Wacker Drive, Suite 250
Chicago, Illinois 60601
312-782-7120
#36074

STATE OF ILLINOIS)
)
COUNTY OF COOK) ss.

AFFIDAVIT

PAUL I. NEMOY, being first duly sworn, states:

1. His law firm represents the plaintiff, Brenda Joyce, Special Administrator of the Estate of Elizabeth E. Rodriguez, deceased, in a medical negligence action against Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., regarding their failure to appropriately respond to decedent's post-operative hemorrhage following performance of a late second trimester abortion.

2. The defendant, Lichtenberg performed said pregnancy termination upon the decedent at the Family Planning Associates Medical Group's outpatient surgery center on March 25, 2000. During the course of the procedure, Lichtenberg ruptured decedent's uterus. Decedent developed a massive vaginal hemorrhage post-operatively and defendants failed to recognize the cause and severity of the bleeding, failed to take appropriate measures to control the bleeding and failed to arrange a timely transfer of the decedent to a hospital facility capable of providing her with the intensive care and treatment she desperately needed.

3. Decedent died that same day, March 25, 2000. Her cause of death was determined to be massive vaginal hemorrhage due to uterine perforation and atony, and plaintiff alleges that decedent's death would not have occurred but for the negligent conduct of the defendants.


4. Lane Jay Mercer, M.D., a currently practicing, board certified Obstetrician and Gynecologist and Professor of Obstetrics and Gynecology at Northwestern University Medical School, has examined the medical records of treatment provided by these defendants, Rush-Presbyterian-St. Luke's Medical Center and the records and photographs of post mortem examination performed by the Cook County Medical Examiner's Office, and has informed my law firm in writing that the treatment rendered by the defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd., falls below recognized standards of medical care and that reasonable and meritorious cause exists for the filing of this case against them.

5. On the basis of that review and consultation, and my own review of the relevant records and literature, I have concluded there is a reasonable and meritorious basis to file this case against defendants, Edward Steve Lichtenberg, M.D. and Family Planning Associates Medical Group, Ltd

6. Attached to this affidavit is the written report of Dr. Mercer that sets forth his opinions.

Further, your affiant sayeth not.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



PAUL I. NEMOY

HOWARD & NEMOY
Attorneys for Plaintiff
35 East Wacker Drive, Suite 250
Chicago, Illinois 60601
312-782-7120
#36074

THE ASSOCIATION FOR WOMEN'S HEALTH CARE, LTD.

July 21, 2000

Paul I. Nemoy
35 East Wacker Drive
Suite 250
Chicago, IL 60601

Re: Maria Rodriguez, Deceased

Dear Mr. Nemoy:

I am a board certified Obstetrician/Gynecologist practicing in Chicago, Illinois. As part of my practice, I perform pregnancy terminations and am familiar with the recognition and treatment of complications of this procedure. I have reviewed, at your request, the records of Family Practice Medical Group, Rush-Presbyterian- St. Luke's Hospital, and the Report of Post-Mortem Examination from the Office of the Medical Examiner, Cook County as they pertained to Maria Rodriguez, her pregnancy termination on March 25, 2000 and the subsequent complications that ensued.

The patient underwent an elective termination of pregnancy at approximately 18 weeks gestation from her last menstrual period on 3/25/00 at an ambulatory surgery center, 5086 North Elston Avenue, Chicago. The procedure was performed by Dr. E. Steve Lichtenberg, a physician who holds himself out to be competent and trained to perform late second trimester abortions. After a seemingly uncomplicated (albeit short) procedure, the patient was taken to the recovery area where at 9:00 AM she began to experience a post-operative hemorrhage. Prior to the hemorrhage, her post-operative hematocrit was 32%. She was taken back to the operating room and re-examined under anesthesia where a "moderate flow" of blood was identified. A repeat hematocrit was 25%, a drop of 20-25% from the value in the recovery room. An attempt was made to stop the bleeding with an installation of a "dilute solution" of Vasopressin into the uterine cavity. Manual compression was used to decrease the blood loss. At no time were further attempts made to ascertain the cause of the bleeding or to explain the discrepancy between the marked decrease of hematocrit and the seemingly moderate blood loss. At 9:34 AM, the patient received Fresh Frozen Plasma (FFP) to treat a presumed disseminated intravascular coagulation. In spite of continued infusion of FFP (a total of 14 units in all) the patient continued to exhibit clinical deterioration as evidenced by dropping hematocrit, tachycardia, ST-T wave depression on EKG, and continued bleeding. No attempt was made to replace the lost oxygen carrying capacity of her blood with transfusion or rapid transfer to facility where such a transfusion could be performed. Furthermore, subsequent to the unsuccessful use of Vasopressin, no pharmacological attempt was made

DAVID ZBARAZ, M.D.
RONALD M. MELTZER, M.D.
NORMAN A. GINSBERG, M.D.
SUE A. HUNGERFORD, M.D.
DAVID A. BAUM, M.D.
MARK A. SIBUL, M.D.
LANE J. MERCER, M.D.
MARGARET A. SALAMON, M.D.
CHRISTINA MOISIDIS, M.D.

JULIAN B. ULLMAN, M.D., S.C.

to aid uterine contractility with agents such as pitocin, methergine, or prostaglandins. At 10:15 AM when there appeared to be a temporary stabilization of the patient, no attempt was made to determine the cause of bleeding with ultrasound evaluation of the abdomen for intra-abdominal bleeding from perforation or through surgical intervention to stem further bleeding such as hypogastric artery ligation.

At 10:30 AM, the hematocrit was 15% indicating continued bleeding and further compromise of Ms Rodriguez's condition. According to records provided, it was not until this value was obtained that plans were made to transport the patient to a hospital facility. This was one and one half hours after the initial hemorrhage and approximately one hour after the diagnosis of DIC was entertained.

Upon arrival at Rush-Presbyterian-St. Luke's, the patient exhibited signs of hemodynamic shock and the medical record reports a hematocrit of approximately 3.5%. The patient's course was rapidly downhill and she expired in spite of best resuscitation efforts that evening.

Post-mortem examination revealed a perforation of the uterus and an enlarged uterus, consistent with a 20 to 22 week uterus. The size of the uterus, evidence of perforation, and autopsy photographs of the uterus with marked ecchymosis of the myometrium speak to the etiology of the patient's exsanguination, that is, perforation with bleeding into the myometrium leading to uterine atony and excessive bleeding. The latter resulted in a consumptive coagulopathy with resulted in DIC and was the proximate cause of Ms Rodriguez's demise.

In my opinion, the failure of Dr. Lichtenberg to recognize the perforation, act rapidly to prevent the complications through use of pharmacological agents to stem the bleeding, administer blood to prevent exsanguination, recognize the severity of bleeding, intervene surgically when the opportunity presented itself, and transfer the patient in a timely manner to a facility capable of providing the intensity of care needed by this gravely ill patient all fell below the standard of care required of a reasonably qualified physician who performs second trimester abortion procedures. Thus, a reasonable and meritorious cause exists for the filing of a medical malpractice suit against Dr. Lichtenberg and Family Planning Associates Medical Group.

Yours truly,


Lane Jay Mercer, M.D.

#32662

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

BRENDA JOYCE, Individually and as)
Special Administrator of the)
Estate of MARIA E. RODRIGUEZ,)
Deceased,)

Plaintiff,)

vs.)

EDWARD STEVE LICHTENBERG, M.D.,)
and FAMILY PLANNING ASSOCIATES)
MEDICAL GROUP, LTD., an Illinois)
Corporation,)

Defendants.)

No. 00 L 008492

ANSWERS TO INTERROGATORIES BY
EDWARD STEVE LICHTENBERG, M.D.

Defendant E. Steve Lichtenberg, M.D. answers plaintiff's
Medical Malpractice Interrogatories as follows:

[1. State your full name, professional and residence addresses, and attach a current copy of your curriculum vitae (CV), state in detail your professional qualifications, including your education by identifying schools from which you graduated and the degrees granted and dates thereof, your medical internships and residences, fellowships and bibliography of your professional writing(s).]

ANSWER: See C.V., attached as Exhibit 1.

[2. State whether you have held any position on a committee or with an administrative body at any hospital. If so, state when you held such position(s) and the duties and responsibilities involved in such position(s).]

ANSWER: See attached C.V.

[3. Have you ever been named as a defendant in a lawsuit arising from alleged malpractice or professional negligence? If so, state the court, the caption and the case number for each lawsuit.]

ANSWER: Yes. I do not keep a list of such cases. They were all

in Cook County.

[4. Since the institution of this action, have you been asked to appear before or attend any meeting of a medical committee or official board of any medical society or other entity for the purpose of discussing this case? If so, state the date(s) of each such meeting and the name and address of the committee, society or other entity conducting each meeting.]

ANSWER: No.

[5. Have you ever testified in court in a medical malpractice case? If so, state the court, the caption and the case number of each such case, the approximate date of your testimony, whether you testified as a treating physician or expert and whether you testified on your own behalf or on behalf of the defendant or the plaintiff.]

ANSWER: Yes. I testified once as a defendant and several times as an expert for a defendant.

[6. Has your license to practice medicine ever been suspended or has any disciplinary action ever been taken against you in reference to your license? If so, state the specific disciplinary action taken, the date of the disciplinary action, the reason for the disciplinary action, the period of time for which the disciplinary action was effective and the name and address of the disciplinary entity taking the action.]

ANSWER: No.

[7. State the name, author, publisher, title, date of publication and specific provisions of all medical texts, books, journals or other medical literature which you or your attorney intend to use as authority or reference in defending any of the allegations set forth in the complaint.]

ANSWER: None has as of yet been selected. These will be disclosed in the future.

[8. Were you named or covered under any policy or policies of liability insurance at the time of the care and treatment alleged in the complaint? If so, state for each policy:

- (a) The name of the insurance company;
- (b) The policy number;

- (c) The effective policy period;
- (d) The maximum liability limits for each person and each occurrence, including umbrella and excess liability coverage; and
- (e) The named insured(s) under the policy.]

ANSWER:

- (a) Chubb/Executive Risk.
- (b) 81651280.
- (c) 2/28/00-2/28-01.
- (d) \$1,000,000/\$3,000,000.
- (e) Family Planning Associates Medical Group, Ltd.

[9. State whether you were affiliated with a corporate medical practice or partnership in any manner on the date of the occurrence alleged in the complaint. If so, state the name of the corporate medical practice or partnership, the nature of your affiliation and the dates of your affiliation.]

ANSWER: Family Planning Associates Medical Group, Ltd.

[10. Were you at any time an employee, agent, servant, shareholder or partner of Family Planning associates Medical Group, Ltd.? If so, state the date(s) and nature of your relationship.]

ANSWER: Yes, at all relevant dates. Shareholder and Medical Director.

[11. State whether there were any policies, procedures, guidelines, rules or protocols for dealing with patients who hemorrhage peri-operatively or immediately following pregnancy termination that were in effect at Family Planning Associates Medical Group, Ltd. at the time of the care and/or treatment alleged in the complaint. If so, state:

- (a) Whether such policies, guidelines, rules or protocols are published and by whom;
- (b) The effective date of said policies, guidelines, rules or protocols;
- (c) Which medical professionals are bound by said policies, guidelines, rules or protocols;

- (d) Who is the administrator of any such policies, procedures, guidelines, rules and/or protocols; and
- (e) Whether the policies, guidelines, rules or protocols in effect at the time of the occurrence alleged in the complaint have been changed, amended, or altered since the occurrence. If so, state the change(s) and the date(s) of any such change(s).]

ANSWER:

(a-e) Attached is a page from the Surgical Center's Policy & Procedure Manual. This page is directed to nurses and medical assistants. As Medical Director, I am responsible for seeing medical policies are enforced. This policy has not been changed since the occurrence.

[12. Were any photographs, movies and/or videotapes taken of the plaintiff's decedent or of the procedures complained of? If so, state the date(s) on which such photographs, movies and/or videotapes were taken, who is displayed therein, who now has custody of them, and the name, address, occupation and employer of the person taking them.]

ANSWER: None known to defendants beyond that done by the medical examiner.

[13. Do you know of any statements made by any person relating to the care and treatment or the damages described in the complaint? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written or oral and if written the present location of each such statement.]

ANSWER: None beyond medical records and plaintiff's deposition.

[14. Do you have any information:

- (a) That plaintiff's decedent was, within the ten years immediately prior to the care and treatment described in the complaint, confined in a hospital and/or clinic, treated by a physician and/or other health professional, or x-rayed for any reason other than personal injury? If so, state the name and address of each such hospital and/or clinic, physician, technician and/or health care professional, the approximate date of such confinement or

service and state the reason for each confinement or service.

- (b) That plaintiff's decedent had suffered any serious personal injury and/or illness within ten years prior to the date of the occurrence? If so, state when, where and how she was injured and/or ill and describe the injuries and/or illness suffered.
- (c) That any other suits have been filed for any decedent's personal injuries? If so, state the nature of the injuries claimed, the court(s) and caption(s) in which filed, the year(s) filed, and the title(s) and docket number(s) of the suit(s).
- (d) That any claim for workers' compensation benefits had been filed for plaintiff's decedent? If so, state the name and address of the employer, the date(s) of the accident(s), the identify of the insurance company that paid any such benefits and the case number(s) and jurisdiction(s) where filed.]

ANSWER: (a-d) None beyond what plaintiff has disclosed.

[15. Have you (or has anyone acting on your behalf) had any conversations with any person at any time with regard to the manner in which the care and treatment described in the complaint was provided, or have you overheard any statement made by any person at any time with regard to the injuries complained of by the plaintiff's decedent or the manner in which the care and treatment was provided? If so, state the following:

- (a) The date or dates of such conversation(s) and/or statement(s);
- (b) The place of such conversation(s) and/or statement(s);
- (c) All persons present for the conversation(s) and/or statement(s);
- (d) The matters and things stated by the person in the conversation(s) and/or statement(s);

(f) Who has possession of the statement(s) if written and/or recorded.]

ANSWER: (a-f) No.

[16. State whether this answering defendant and/or Family Planning Associates Medical Group, Ltd. are members of the National Abortion Federation.]

ANSWER: Yes.

[17. Pursuant to Illinois Supreme Court Rule 213(f), provide the name and address of each witness who will testify at trial and state the subject of each witness' testimony.]

ANSWER: Witnesses have not yet been selected.

[18. Pursuant to Illinois Supreme Court Rule (g), provide the name and address of each opinion witness who will offer any testimony and state:

- (a) The subject matter on which each opinion witness is expected to testify;
- (b) The conclusions and/or opinions of each opinion witness and the basis therefor, including whether written reports have been prepared by the witness(es) and if so, attach copies of the reports, if any;
- (c) The qualifications of each opinion witness, including a *curriculum vitae* and/or resume, if any;
- (d) The identity of any written reports of each opinion witness regarding this occurrence; and
- (e) Whether or not the opinion witness has been retained by you to testify at trial.]

ANSWER: (a-e) Opinion witnesses have not yet been selected.

[19. Have you retained any expert(s), other than as a "consultant" as that term is defined in Supreme Court Rule 201(b)(3), to testify on your behalf at trial or to assist you in any other way? If so, for each retained expert, state:

- (a) The expert's area(s) of expertise;
- (b) The expert's qualifications, including a *curriculum vitae* and/or resume, if any; and
- (c) The conclusions and/or opinions and bases therefor, including whether written reports have been prepared by the expert(s) and if so, attach copies of the reports.]

ANSWER: See response to Interrogatory 18.

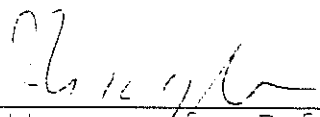
[20. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories

which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).]

ANSWER: None known.

[21. List the names and addresses of all persons (other than yourself and persons heretofore listed) who have knowledge of the facts regarding the care and treatment complained of in the complaint filed herein and/or of the injuries claimed to have resulted therefrom.]

ANSWER: None other than as reflected in the medical records or disclosed by plaintiff.



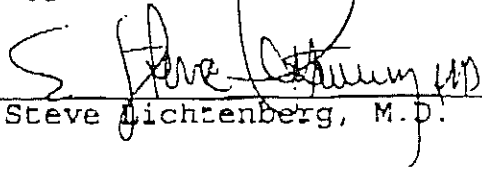
One of the Attorneys for Defendant
E. Steve Lichtenberg, M.D.

John K. Hughes
GESSLER, HUGHES & SOCOL, LTD.
Three First National Plaza
70 West Madison Street, Suite 2200
Chicago, Illinois 60602
(312) 580-0100

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

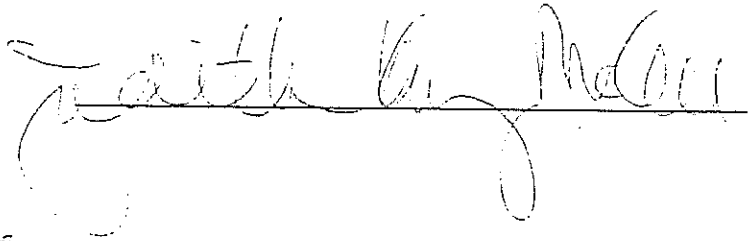
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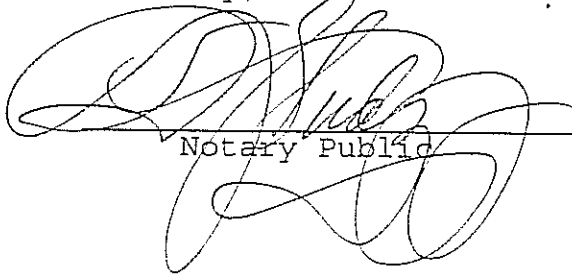
E. Steve Lichtenberg, M.D.

AFFIDAVIT OF SERVICE

The undersigned, a non-attorney on oath states that she mailed a copy of the foregoing, Answers to Interrogatories by Edward Steve Lichtenberg, M.D., to the following Attorneys of Record: Paul I. Nemoy, Esq., Howard & Nemoy, 35 East Wacker Drive, Suite 250, Chicago, Illinois, 60601. The pleading was mailed via first class mail from Three First National Plaza, 70 West Madison Street, Suite 2200, Chicago, Illinois, 60602, this 6th day of February, 2001.



SUBSCRIBED and SWORN TO
before me this 6th day of
February, 2001.


Notary Public

