IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLUMBIA

In re:	)	
	)	
GREATER SOUTHEAST COMMUNITY	)	Jointly Administered
HOSPITAL CORP., I, *et al.,*	)	Case No. 02-2250 (SMT)
	)	(Chapter 11)
Debtors.	)	

AFFIDAVIT OF MARIA VELASQUEZ

I, Maria Velasquez, do hereby declare and affirm under the penalties of perjury, that the contents of the following Affidavit are true and correct:

1. I am an adult and free from any legal disability. I am competent to testify to the facts and matters set forth in this Affidavit, which facts and matters are stated upon my own personal knowledge.

2. I am a 43 year old Hispanic woman who does not speak or read English. Before I executed this Affidavit, it was translated to me in Spanish.

3. On or about May 29, 2002, I presented to the emergency room of Greater Southeast Community Hospital ("GSCH").

4. I was examined and a diagnosis of acute cholycistitis was made. I was admitted to the surgery ward of GSCH and scheduled for surgery with a doctor named Robert J. Boakai, M.D. ("Dr. Boakai").

5. On or about May 29, 2002, I underwent laparascopic cholecystectomy surgery performed by Dr. Boakia at GSCH.

6. During this procedure, Dr. Boakai perforated my viscus duodenum. This condition went undetected and the surgery was concluded.

7. I remained in the hospital of GSCH overnight. I was discharged on May 31, 2002 with a fever of between 99.2° and 99.4°.

8. On or about June 2, 2002, I experienced shortness of breath, abdominal pain, cramping and nausea. I presented to the emergency room of Howard University Hospital for evaluation of these symptoms. I underwent an abdominal CT which revealed perihepatic fluid collection, fluid filled loops of bowel and free intra-abdominal contrast.

9. I was admitted and taken to the operating room for exploratory laparotomy performed by Dr. Zulu. During the procedure, Dr. Zulu repaired my duodenum with omental patch, drained intra-abdominal abscess and lysis of adhesions.

10. Thereafter, I developed an infection and became septic as result of the perforations I sustained during the surgery of May 29, 2002.

11. I continued to complain of abdominal pain and a CT revealed a fluid collection in the left abdomen and pelvis.

12. I underwent another surgery on June 10, 2002 for drainage of fluid.

13. I developed an abscess which had to be drained.

14. I remained hospitalized until June 28, 2002.

15. As a result, I have suffered permanent injury, past and future medical expenses, pecuniary loss and extreme pain and suffering.

16. I consulted with professionals in an effort to determine whether I had a claim against any parties. The merits of the case could not be determined until after the Bar Date to file claims of May 30, 2003.

17. In March of 2004, I filed suit in the Superior Court for the District of Columbia against Dr. Boakai and DCHC for $5,000,000. This case was docketed as case number 04-1758 (the "Initial Superior Court Action"). At the time of filing of this suit, I was not aware of the pending bankruptcy case with respect to either DCHC or GSCH. At no time during the pendency of the Initial Superior Court Action, did either of the defendants notify me that a bankruptcy case was pending until May of 2005. Indeed, prior to notifying my counsel of the pending bankruptcy proceeding, DCHC (i) filed an answer, (ii) answered discovery, (iii) noticed records depositions, (iv) filed a witness list, (vi) propounded Interrogatories and a Request for Production of Documents, (vii) filed a Rule 26(a)(2) statement, (viii) consented to a motion for entry of a revised scheduling order, (ix) appeared at a status conference, (x) exchanged multiple correspondence with my counsel, and (xi) requested that I make a demand to settle.

18. Due to the pending expiration of the applicable statute of limitations, I also filed a separate suit against Dr. Boakai and GSCH on May 25, 2005 (the "Second Superior Court Action"). This case was docketed as Case No. 05-3940.

19. At no time did I receive actual notice of the pending bankruptcy proceedings. I was not listed as a creditor on the Schedules of the Reorganized Debtors. The only way with which I could have received notice of the Bar Date to file claims would be by reading the papers in which the notice of the entry of the Bar Date order was published. This would have required me to have read and understood *The Washington*

Times, *The Daily Herald*, *The Arizona Region Version of The Wall Street Journal*, and *The Daily News* on April 30, 2003 in sufficient time to file a claim by May 30, 2003. I did not read any of these publications, nor am I fluent in English sufficient enough to have clearly understood the publication even if I had read it. Indeed, my counsel's communications with me must either be in Spanish or with an interpreter.

Maria Velasquez

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