

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

RUTH SANTANA MAYMÍ,

Plaintiff,

v.

CENTRO DE MEDICINA PRIMARIA DE VEGA ALTA, a/k/a IPA 307; DR. SAUL RIVERA; HOSPITAL HERMANOS MELÉNDEZ, INC.; VEGA ALTA COMMUNITY HEALTH, INC.; DR. JOSUE VÁZQUEZ-DELGADO; DRA. ROSA VÁZQUEZ-RODRÍGUEZ; DR. YASSER AWAD-MELÉNDEZ; DR. OSVALDO NIEBLA DÍAZ; DR. JORGE VÁZQUEZ-MARCANO; DR. JOSÉ BARRERAS-RINCÓN; DOCTOR'S HOSPITAL MANATÍ, INC.; CONTINENTAL INSURANCE COMPANY, INC.; GRUPO HIMA SAN PLABLO, INC., H/N/C HIMA SAN PABLO, CAGUAS; DR. IVÁN SOSA-GONZÁLEZ; DR. MARÍA TOLEDO-GONZÁLEZ; DR. GLORIA M. RODRÍGUEZ-VEGA; ABC INSURANCE COMPANIES, INC; MOES I-X; DOE-ROE CONJUGAL PARTNERSHIPS I-X; SINDICATO DE ASEGURADORES PARA LA SUSCRIPCIÓN CONJUNTA DEL SEGURO DE RESPONSABILIDAD PROFESIONAL MÉDICO-HOSPITALARIA ("SIMED"),

CIVIL NO.

RE: TORT ACTION FOR MEDICAL MALPRACTICE PURSUANT TO ARTS. 1802 AND 1803 OF THE PUERTO RICO CIVIL CODE, 31 P. R. Laws Ann. §§ 5141 AND 5142.

JURY TRIAL DEMANDED

**COMPLAINT**

**TO THE HONORABLE COURT:**

**APPEARS NOW** the Plaintiff, RUTH SANTANA MAYMÍ, (hereinafter referred to as "Plaintiff" or "RUTH"), through the undersigned counsel, and hereby states, alleges, and requests as follows:

**JURISDICTIONAL BASIS**

1. Plaintiff is a citizen of, domiciled in, and resides in the state of Pennsylvania.

2. All Defendants are either individuals who reside in Puerto Rico or corporations organized under the laws of the Commonwealth of Puerto Rico or of states other than Pennsylvania.
3. The matter in controversy exceeds the sum of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00), exclusive of interest and costs, thus vesting jurisdiction on this Honorable Court pursuant to 28 U.S.C. § 1332.
4. Venue is proper in the District of Puerto Rico pursuant to 28 U.S.C. §1391, since the events or omissions giving rise to this claim occurred in this district.

#### THE PARTIES

5. Plaintiff **RUTH SANTANA MAYMÍ** is the first cousin of patient María de los Ángeles Santana Álamo (hereinafter "María"); Plaintiff Ruth and patient María grew up together in Puerto Rico and shared much of their adult lives, up until Ruth had to move to the United States in 2009, reason for which, they are like sisters.
6. Co-Defendant **CENTRO DE MEDICINA PRIMARIA DE VEGA ALTA**, a/k/a **IPA 307** (hereinafter referred to as "**Co-Defendant IPA 307**"), is a for profit corporation (registration number 140326) organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Puerto Rico, which owns, operates, and/or manages a private primary health care facility.
7. Co-Defendant **DR. SAUL RIVERA** (hereinafter referred to as "**Co-Defendant RIVERA**") is a physician practicing medicine at Co-defendant IPA 307, who provided patient María with primary medical care since, approximately, the year 2009 and throughout the years 2010 and 2011.

8. Co-Defendant **HOSPITAL HERMANOS MELÉNDEZ, INC.** (hereinafter referred to as “**Co-Defendant HHM**”) is a for profit corporation (registration number 2173) organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Puerto Rico, which owns, operates, and/or manages a private hospital and Emergency Department.
9. Co-Defendant **VEGA ALTA COMMUNITY HEALTH, INC.** (hereinafter referred to as “**Co-Defendant VACH**”) is a for profit corporation (registration number 124629) organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Puerto Rico, which owns, operates, and/or manages a private health services facility which offers 24 hour emergency services, among other health services.
10. Co-Defendant **DR. JOSUE VÁZQUEZ-DELGADO** (hereinafter referred to as “**Co-Defendant DR. VÁZQUEZ-DELGADO**”) is a physician practicing medicine at Doctors' Center Hospital, Inc. who conducted and/or provided one or more radiological tests and/or readings of CT Scans and MRIs to María.
11. Co-Defendant **DR. ROSA VÁZQUEZ-RODRÍGUEZ** (hereinafter referred to as “**Co-Defendant DR. VÁZQUEZ-RODRÍGUEZ**”) is a physician practicing medicine at Doctors' Center Hospital, Inc., who provided patient María with medical care at such facility.
12. Co-Defendant **DR. OSVALDO NIEBLA DÍAZ** (hereinafter referred to as “**Co-Defendant DR. NIEBLA**”) is a physician practicing medicine at Doctors' Center Hospital, Inc., who provided patient María with medical care at such facility.

13. Co-Defendant **DR. YASSER AWAD MELÉNDEZ** (hereinafter referred to as “**Co-Defendant DR. AWAD**”) is a physician practicing medicine at Doctors' Center Hospital, Inc., who provided patient María with medical care at such facility.
14. Co-Defendant **DR. JORGE VÁZQUEZ MARCANO** (hereinafter referred to as “**Co-Defendant DR. VÁZQUEZ**”) is a physician practicing medicine at Co-Defendant DCH, who provided patient María with medical care at such facility.
15. Co-Defendant **DR. JOSÉ BARRERAS RINCÓN** (hereinafter referred to as “**Co-Defendant DR. BARRERAS**”) is a physician practicing medicine at Doctors' Center Hospital, Inc. who conducted and/or provided various radiological readings of CT Scans and MRIs done to María.
16. Co-Defendant **DOCTORS' CENTER HOSPITAL & MANATÍ EMERGENCY MEDICAL SERVICES, INC.** (hereinafter referred to as “**Co-Defendant DCH**”) is a for profit corporation (registration number 157345) organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Puerto Rico.
17. Co-Defendant **CONTINENTAL INSURANCE COMPANY, INC.** (hereinafter referred to as “**Co-Defendant CIC**”), is an insurance company organized, existing, and with its principal place of business in Puerto Rico or a state or territory other than Pennsylvania, which, upon information and belief, issued an insurance policy for medical malpractice on behalf of Co-Defendant DCH.
18. Co-Defendant **GRUPO HIMA SAN PABLO, INC., h/n/c/ HIMA SAN PABLO, CAGUAS** (hereinafter “**Co-Defendant HIMA SAN PABLO CAGUAS**”) is a for profit corporation (registration number 161189) organized under the laws of the Commonwealth of Puerto Rico, with its principal place of business in Puerto Rico.

19. Co-Defendant **DR. IVÁN SOSA-GONZÁLEZ** (hereinafter Co-Defendant "**DR. SOSA**") is a physician practicing medicine at Co-Defendant HIMA San Pablo, who provided patient María with medical care on or about the months of November 2011 and February 2012.
20. Co-Defendant **DR. MARÍA TOLEDO-GONZÁLEZ** (hereinafter Co-Defendant **Dr. Toledo**) is a physician practicing medicine at Co-Defendant HIMA San Pablo, who provided patient María with medical care on or about the months of November 2011 through January 2012.
21. Co-Defendant **DR. GLORIA M. RODRÍGUEZ-VEGA** (hereinafter Co-Defendant "**Dr. RODRÍGUEZ-VEGA**") is a physician practicing medicine at Co-Defendant HIMA San Pablo, who provided patient María with medical care on or about the months of November 2011 through January 2012.
22. Co-Defendants unknown joint tortfeasors **MOES I-X** are physicians or other health care providers fictitiously named herein, to be later replaced by their actual names which may become known through further discovery in this litigation, and who may be liable to Plaintiff, in whole or in part, for the actions and/or omissions herein described, encompassing the relevant period of time, and the damages suffered by Plaintiff.
23. Co-Defendants **DOE-ROE CONJUGAL PARTNERSHIPS I-X** are unknown conjugal partnerships comprised of the individual defendants and their respective husbands and/or wives, who are currently unknown.
24. Co-Defendant **CONTINNENTAL INSURANCE COMPANY, INC.** (hereinafter Co-Defendant "**CIC**") is an insurance company organized, existing, and with its

principal place of business in Puerto Rico or a state or territory other than Pennsylvania, which, upon information and belief, issued an insurance policy for medical malpractice on behalf of Co-defendant DCH, for the acts and/or omissions described herein, encompassing the relevant period of time.

25. Co-Defendant **SINDICATO DE ASEGURADORES PARA LA SUSCRIPCIÓN CONJUNTA DE SEGURO DE RESPONSABILIDAD PROFESIONAL MÉDICO-HOSPITALARIA** (hereinafter, “Co-Defendant SIMED”) is an insurance company organized, existing, and with its principal place of business in Puerto Rico or a state or territory other than Pennsylvania, which issued insurance policies for medical malpractice on behalf of one or more of the Co-Defendants and/or one or more of the unidentified joint tortfeasors in this action, for the acts and/or omissions described herein, encompassing the relevant period of time.
26. Co-Defendants **ABC INSURANCE COMPANIES, INC.** are corporations organized or operating under the laws of the Commonwealth of Puerto Rico, with their principal place of business in Puerto Rico or in a state other than Pennsylvania, which have issued one or more insurance policies for medical malpractice on behalf of one or more of the Co-Defendants and/or one or more of the unidentified joint tortfeasors in this action, for the acts or omissions described herein, encompassing the relevant period of time.
27. Pursuant to 26 P.R. Laws Ann. § 2001, a direct action may be brought in the Commonwealth of Puerto Rico against a casualty or liability insurance carrier for the negligence or fault of its insured.

28. Pursuant to 26 P.R. Laws Ann. § 2003, an action against an insurer may be brought separately or may be joined with an action against its insured.

**GENERAL ALLEGATIONS**

29. During the months of October and November of 2011, María experienced frequent intense headaches, which got progressively worse, accompanied by nausea, dizziness, neck pain and general physical weakness, among other debilitating symptoms.
30. On or before October 29, 2011, María developed a left bulging eye with its upper and/or lower eyelid/s fallen or drooping, the later condition known as ptosis
31. During the time that she experienced the symptoms described in paragraphs 25 and 26, María sought medical care at Co-Defendant IPA 307, where, among other physicians, Co-Defendant Dr. Rivera evaluated her and offered treatment.
32. On or about October 31, 2011, María had to be picked up by an ambulance on the expressway and taken to Co-Defendant DCH emergency ward in Manatí because her intense headache and other previously described symptoms had kept her from continuing to drive her motor vehicle.
33. Shortly afterwards, María was improperly treated and discharged from the emergency room at Co-Defendant DCH with a diagnosis of "severe headache", despite the fact that she was showing many signs and symptoms of an intracranial aneurysm, including the left bulging eye and the ptosis, which condition constitutes a medical emergency.
34. Co-Defendant DCH, its employees, agents, representatives, or assignees failed to take the appropriate and necessary steps to identify and appropriately treat

María's condition and/or symptoms, including but not limited to the failure to conduct an adequate examination, evaluation, investigation and testing of the patient as per her specific signs and symptoms.

35. On or about November 7, 2011, Co-Defendant Rivera, working at Co-Defendant IPA 307, referred María to a psychiatrist and to get her vision checked, despite the fact that at this time she was showing the emergency medical condition described in paragraph 30 and he knew that she had repeatedly complained of severe headaches, nausea, vomiting and neck pain, all signs and symptoms of an intracranial aneurysm.
36. Co-Defendant Rivera failed to take the appropriate and necessary steps to identify and appropriately treat María's condition and/or symptoms, including but not limited to the failure to conduct an adequate examination, evaluation, investigation and testing of the patient as per her specific signs and symptoms.
37. On November 4, 2011, still showing the bulging left eye with its accompanying ptosis, María sought emergency medical services at Co-Defendant VACH, where she complained of headache, dizziness and vomiting.
38. María was improperly treated and discharged from Co-Defendant VACH on the same day that she sought medical care there.
39. Co-Defendant VACH, its employees, agents, representatives, or assignees failed to take the appropriate and necessary steps to identify and appropriately treat María's condition and/or symptoms, including but not limited to the failure to conduct an adequate examination, evaluation, investigation and testing of the patient as per her specific signs and symptoms.



40. Still showing the bulging left eye and the ptosis, María once more sought emergency medical services at the emergency room of Co-Defendant DCH on or about November 11, 2011, reporting her recurrent symptoms of headache, nausea, vomiting and neck pain and/or stiffness.
41. She was improperly treated and sent home with a diagnosis of "hypertension" and "acute headache".
42. Once more, Co-Defendant DCH, its employees, agents, representatives, or assignees failed to take the appropriate and necessary steps to identify and appropriately treat María's condition and/or symptoms, including but not limited to the failure to conduct an adequate examination, evaluation, investigation and testing of the patient as per her specific signs and symptoms.
43. On November 13, 2011, while continuing to show severe neurological symptoms, María sought emergency medical services at the emergency room of Co-Defendant HHM, where she complained of headache, dizziness and vomiting.
44. A CT-Cranial without contrast was performed at Co-Defendant HHM, which interpretation failed to identify any acute intracranial pathology.
45. Co-Defendant HHM, its employees, agents, representatives, or assignees failed to take the appropriate and necessary steps to identify and appropriately treat María's condition and/or symptoms, including but not limited to the failure to conduct an adequate examination, evaluation, investigation and testing of the patient as per her specific signs and symptoms.
46. On November 14, 2011, Maria was at the facilities of Co-Defendant IPA 307 waiting to be seen by a gynecologist. Upon crossing paths with María on the

waiting area, two physicians noticed her bulging eye and, interpreting the same as a signs of a stroke or some other cerebro-vascular condition, directed her to go immediately to an emergency room.

47. María went to the emergency room at Co-Defendant DCH, where she continued to exhibit an emergency medical condition.
48. A brain MRI was performed on November 14, 2011; the radiologist's impression of the images taken without gadolinium enhancement was that of "right facial nerve inflammatory process".
49. A second MRI of the brain was performed on November 18, 2011; the impression of the radiologist interpreting the gadolinium-enhanced sequences of this MRI was that of "left internal carotid cavernous portion tortuosity versus an aneurysm"; it was recommended that a CTA be done for further evaluation.
50. The findings of this MRI were not notified or discussed with the attending physician until the following day, November 19, 2011, at 10:05 PM.
51. By the time the findings of the MRI were notified to a physician, María had already collapsed on the morning of November 19, 2011, due to a ruptured aneurysm in her brain.
52. The impression of a CT of the brain performed on November 19, 2011 was that of "subdural hemorrhage" and "early changes of basal herniation".
53. On November 22, 2011, María was transferred to Co-Defendant HIMA San Pablo, where she was intervened surgically on two occasions.
54. María's condition worsened while at Co-Defendant HIMA San Pablo, up to the point where María has been left in an "awake but locked-in" state that entails her

being fully bedridden yet conscious of her situation and only able to communicate with others through the simplest of gestures, like blinking.

55. As a result of the ruptured aneurysm and of the Defendants' failure to timely identify and adequately treat her condition, to this day María is bedridden, in what is know as an "aware but locked-in" condition, requiring round-the-clock care and supervision, in addition to expensive treatments, medicines, equipment and therapies, among others.
56. María's four sisters, provide her with the care and supervision she requires, taking turns of 12-hour shifts and using their already limited economic resources to provide her with her with as many of her extensive needs as they can.
57. María's only son, not having a regular job, also contributes to María's care as much as he is able to.
58. María's elderly parents are unable to help their four daughters in the care of María; it is the same four sisters who care for their parents, as they suffer from various illnesses themselves due to their age.
59. Plaintiff Ruth has half of her body paralyzed as a result of her own past experience with brain aneurysms, reason for which she has been unable to provide any help to her four cousins in the care of María, who is like a sister to her.
60. Timely and proper treatment and medical services from Defendants, which should have included adequate examinations, evaluations, investigation and testing of the patient, would have revealed María's condition earlier, thus providing her an opportunity to get proper treatment before the aneurysm ruptured and, quite probably, entirely avoiding the catastrophic outcome.

61. Defendants failed to timely or adequately examine, diagnose, intervene or otherwise provide appropriate treatment to María, causing her condition to reach its catastrophic outcome before she had any opportunity for treatment.
62. Plaintiff has suffered intense emotional pain and suffering as a direct result of Defendants' negligence and/or the negligence of their employees, agents, or assignees upon her beloved cousin, María.

**FIRST CAUSE OF ACTION  
FOR NEGLIGENCE UNDER ARTICLES 1802 AND 1803  
OF THE PUERTO RICO CIVIL CODE**

63. The allegations contained above are incorporated by reference as if again fully set forth herein
64. Defendants, through their own acts or omissions or the acts or omissions of their employees, agents, representatives, or assignees, have caused damages to Plaintiff Ruth through fault or negligence in violation of 31 L.P.R.A. §5141 and/or 31 L.P.R.A. §5142.
65. Defendant health care facilities owed a duty to María and to Plaintiff Ruth to provide personnel, doctors, facilities, staffing, treatment and medical care that would, in turn, provide María with that degree of care that would be exercised by a reasonable and prudent man in the same conditions and circumstances.
66. Defendant individual physicians owed a duty to María and to Plaintiff Ruth to provide her with medical care consistent with the medical standards that satisfy the exigencies generally recognized by the medical profession in light of the modern means of communication and teaching.

67. The treatment and medical care offered by Defendants to María, directly or through its personnel, nurses, employees, doctors, agents and assignees, to was below the medical standard that satisfies the exigencies generally recognized by the medical profession in light of the modern means of communication and teaching and, as such, directly caused and/or contributed to causing María's pain, suffering, and current catastrophic state, as well as the pain and suffering of Plaintiff Ruth, as described herein.
68. Defendants failed to provide adequate medical care and treatment, including but not limited to: failing to have or exercise the required knowledge and medical skill; failing to adequately perform examinations and evaluations of María; failing to refer to a specialist or conduct necessary testing, failing to order, properly conduct and/or accurately read the pertinent tests, CT scans, MRIs and/or angiograms; failing to take timely, appropriate, or necessary steps to treat or alleviate María's symptoms; failing to refer María to an appropriate hospital, doctor, or specialist; failing to exercise due care and caution; failing to properly staff their medical practices to timely, safely, and appropriately treat their patients; failing to obtain or receive appropriate and proper medical training; failing to timely take the necessary and appropriate steps to reach an accurate diagnosis, and/or to otherwise recognize María's condition.
69. Defendants negligently failed to recognize the serious nature of María's condition, even in light of her evident physical signs, failing, thus, to adequately investigate an apparent medical emergency, as evidenced by María's bulging eye, ptosis and other recurrent signs and symptoms.

70. Defendants negligently failed to recognize in María, as per her medical history and present clear signs and symptoms, the need to affirmatively engage in the process of differential diagnosis, in order to rule out or confirm the presence of an intracranial aneurysm.
71. Defendants negligently failed to perform timely surgical interventions to María, causing her condition to significantly worsen up to the point where María has been left in an "awake but locked-in" state that entails her being conscious of her situation and able to communicate with others only through the simplest of gestures, like blinking and crying.
72. Defendants performed deficient surgical interventions to María, failing thus to prevent further damage to her brain.
73. Defendants negligently caused María to be discharged inappropriately and to provide her with adequate follow-up medical care.
74. Defendants misled María into thinking that she would be appropriately treated.
75. As a direct and proximate result of Defendants' direct negligence and/or the negligence of their employees, agents, or assignees, María's brain condition was left untreated for months and worsened significantly, eventually developing into a ruptured aneurysm which required surgical intervention, leaving María in a catastrophic state that requires care and supervision 24-hours a day for life and caused and continues to cause Plaintiff Ruth the intense pain and suffering described herein.

**SECOND CAUSE OF ACTION AGAINST  
THE CONJUGAL PARTNERSHIPS**

76. The allegations contained above are incorporated by reference as if again fully set forth herein.
77. The activities by which the individual defendant doctors caused Plaintiff's damages were activities which benefitted their respective conjugal partnerships, referred to herein as Doe-Roe Conjugal Partnerships I-X, as Plaintiff lacks information as to the actual names of the respective wives and/or husbands .
78. As such, each conjugal partnership is jointly and severally liable to Plaintiff for the damages caused by the individual physician Defendants.

**THIRD CAUSE OF ACTION  
AGAINST CONTINENTAL INSURANCE CO.,  
SIMED & ABC INSURANCE COMPANIES**

79. The allegations contained above are incorporated herein by reference as if again fully set forth.
80. Defendants Continental Insurance Co., SIMED and ABC Insurance Companies were, at all times herein pertinent, insurance companies authorized to do business as such in the Commonwealth of Puerto Rico, which issued public liability and/or malpractice insurance policies and/or other applicable insurance on behalf of the Defendants and/or other unknown joint tortfeasors.
81. Pursuant to 26 P.R. Laws Ann. § 2001, Defendants Continental Insurance, SIMED and ABC Insurance Companies are jointly and severally liable for the negligence or fault of their insured(s).
82. Pursuant to 26 P.R. Laws Ann. § 2003, this action is brought directly against Defendants Continental Insurance, SIMED and ABC Insurance Companies.

### **DAMAGES**

83. The allegations contained above are incorporated herein by reference as if again fully set forth.
84. Throughout her life, and even after having moved to the United States in 2009, Plaintiff Ruth maintained a very close and supportive relationship with her first cousin María.
85. When they both lived in Puerto Rico, they spend time together on a daily basis, growing up and as adults.
86. Plaintiff Ruth and María closely shared the raising of each other's children.
87. María's current catastrophic state, for all emotional and practical purposes, signifies that Plaintiff Ruth has lost a sister, a friend and a supportive confidant.
88. As a direct and proximate result of the negligent acts and omissions of the Defendants with respect to María, Plaintiff has suffered intense damages in the form of mental and emotional pain and suffering.
89. As a direct and proximate result of the negligent acts and omissions of the Defendants, María suffered a ruptured aneurysm that has left her in an "awake" but "locked-in" state, where she is conscious of her utter inability to do anything for herself and the immense sacrifice of her family in providing her 24-hour care and supervision as well as costly medications, supplies, treatments and therapies.
90. Plaintiff Ruth identifies deeply with María, having herself lived through a similar situation where she found herself bedridden due to the damage that a ruptured aneurysm caused her and knowing that María's current catastrophic state could



have been avoided if she had been provided with timely and adequate medical care.

91. As a direct result of the acts or omissions of all the Defendants, Plaintiff Ruth has suffered damages, including but not limited to, mental anguish and ongoing emotional pain and suffering, due to what amounts to the "loss", for all practical and emotional purposes, of her cousin María, whom she considers a sister.
92. As a direct result of the acts or omissions of all the Defendants, Plaintiff Ruth has suffered damages, including but not limited to, mental anguish and ongoing emotional pain and suffering due to her knowledge that María is aware of her current state.
93. As a direct result of the acts and/or omissions of the Defendants, Plaintiff Ruth has been deprived of the irreplaceable companionship, advice, pleasure and value of her cousin and best friend's love, and will continue to experience that premature, irreplaceable "loss" each day for the rest of her life.
94. Plaintiff's past, present and future emotional damages stemming from the negligent treatment of her cousin and her current catastrophic state has a reasonable value of not less than **Five Hundred Thousand Dollars (\$500,000.00)**.

**TRIAL BY JURY DEMANDED**

95. Plaintiffs hereby demand trial by jury.

**WHEREFORE** , Plaintiff demands judgment against Defendants jointly and severally, in the amount of no less than \$500,000.00, as well as costs incurred, reasonable attorneys'

fees, and such other and further relief as this Honorable Court may seem just and proper under the circumstances.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 5th day of October, 2012.

**INDIANO & WILLIAMS, P.S.C.**  
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