

A.C. 42469 : APPELLATE COURT
JUDITH KISSEL :
vs. :
CENTER FOR WOMEN'S HEALTH, P.C. :
et al. : JANUARY 10, 2019

PRELIMINARY STATEMENT OF ISSUES

Pursuant to Practice Book § 63-4(a)(1), Defendant-Appellant Reed Wang submits the following preliminary statement of issues:

1. Where the Plaintiff failed to include a good-faith certificate from a similar health-care provider with her complaint as required by General Statutes § 52-190a(a) and sought to correct the error after the statute of limitations ran, did the trial court erroneously deny the Defendant's motion to dismiss?
2. Did the trial court erroneously deny the Defendant's request for an evidentiary hearing on the motion to dismiss for lack of a good-faith certificate?
3. Was the evidence insufficient to prove that the purported breach of the standard of care by Defendant Wang caused the Plaintiff's injuries?
4. Did the trial court erroneously instruct the jury that expert testimony was not required to establish causation under the circumstances of this case?
5. Any other issue that may appear after further review of the record.

DEFENDANT REED WANG,

By 

Wesley W. Horton
Kenneth J. Bartschi
HORTON, DOWD, BARTSCHI & LEVESQUE, P.C.
90 Gillett Street
Hartford CT 06105
Juris No. 038478
Phone 860-522-8338
wes@hdblfirm.com
kbartschi@hdblfirm.com

CERTIFICATION

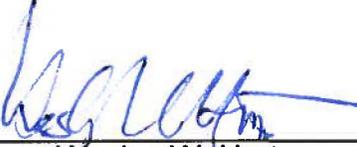
Pursuant to Practice Book § 62-7, I hereby certify that: (1) on January 10, 2019, the foregoing document was emailed to the counsel of record listed below; (2) the document contains no personally identifiable information or information that is prohibited from disclosure by rule, statute, court order, or decisional law or is being filed under seal pursuant to court order; and (3) the document complies with all applicable rules of appellate procedure.

Attorney Mary Alice Moore Leonhardt
MOORE LEONHARDT & ASSOCIATES, LLC
67 Russ Street
Hartford CT 06106
860-216-6337
ma@mooreleonhardt.com

Attorney David J. Robertson
Attorney Keith Blumenstock
HEIDELL, PITTONI, MURPHY & BACH, LL
855 Main Street, Suite 1100
Bridgeport CT 06604
203-382-9700
drobotson@hpmb.com
kblumenstock@hpmb.com

Attorney Paul D. Meade
Attorney Jonathan Kelly
HALLORAN & SAGE, LLP
One Goodwin Square
225 Asylum Street
Hartford CT 06103
860-522-6103
meade@halloransage.com
kelly@halloransage.com

Attorney Sean McElligott
Attorney Matt Blumenthal
KOSKOFF, KOSKOFF & BIEDER, P.C.
305 Fairfield Avenue
Bridgeport CT 06604
203-684-0212
smcelligott@koskoff.com
mblumenthal@koskoff.com



Wesley W. Horton