

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

JOSEPH L. WHEELER and  
FELICIA ANN WHEELER  
47992 Waterview Drive  
St. Inigoes, MD 20684

Plaintiffs

v.

DIMENSIONS HEALTH  
CORPORATION  
Prince George's Hospital and  
Executive Office  
3001 Hospital Drive  
Cheverly, MD 20785

Serve on:

ESLANDA DASHER, Resident Agent  
Corporate Finance Department  
Suite D1000  
7300 Van Dusen Road  
Laurel, MD 20707

and

BROADWAY SERVICES, INCORPORATED  
3709 E. Monument Street  
Baltimore, Maryland 21205

Serve on:

H. Thomas McGown  
3709 E. Monument Street  
Baltimore, Maryland 21205

and

WILLIAM REESE  
Prince George's Hospital and  
Executive Office  
3001 Hospital Drive  
Cheverly, MD 20785

Individually and as Agent of

**FILED**

AUG 17 2010

CLERK OF THE CIRCUIT COURT  
FOR PRINCE GEORGES COUNTY, MD.

Case No. CAUO. 27152



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Case: CAUO-27152  
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LV CLERK FEE 20.00  
AD LEGAL SERV 15.00  
TOTAL 45.00  
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BY: [unclear] 8/17/10  
FOR: [unclear] 8/17/10  
REC'D: [unclear] 8/17/10

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DIMENSIONS HEALTH  
CORPORATION and/or BROADWAY  
SERVICES, INC.

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and

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DONOVAN SCOTT  
Prince George's Hospital and  
Executive Office  
3001 Hospital Drive  
Cheverly, MD 20785

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Individually and as Agent of  
DIMENSIONS HEALTH  
CORPORATION and/or BROADWAY  
SERVICES, INC.

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and

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DWAYNE WILLIAMS  
Prince George's Hospital and  
Executive Office  
3001 Hospital Drive  
Cheverly, MD 20785

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Individually and as Agent of  
DIMENSIONS HEALTH  
CORPORATION

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and

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One or More Unidentified Individual Officers,  
Agents, Administrators or Employees of  
Dimensions Health Corporation and/or  
Broadway Services, Inc.

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Defendants

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**COMPLAINT**

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COMES NOW, the Plaintiffs, JOSEPH L. WHEELER and FELICIA ANN WHEELER,  
by and through their attorneys Bryan T. Dugan, Christopher T. Longmore and the law firm of



Dugan, McKissick, Wood & Longmore, L.L.C., and sues the Defendants DIMENSIONS HEALTH CORPORATION, BROADWAY SERVICES INCORPORATED, WILLIAM REESE, DONOVAN SCOTT, AND DWAYNE WILLIAMS, and in support thereof state as follows:

1. Plaintiff Joseph L. Wheeler is a resident of St. Mary's County, Maryland.
2. Plaintiff Felicia Ann Wheeler is a resident of St. Mary's County, Maryland.
3. Defendant Dimensions Health Corporation is incorporated in the State of Maryland, where it owns and operates various health care facilities that are part of what is commonly known as the "Dimensions Healthcare System" in Prince George's County, Maryland. Dimensions Health Corporation owns and operates Prince George's Hospital Center located at 3001 Hospital Drive, Cheverly, Maryland 20785.
4. Defendant Broadway Services, Incorporated is a corporation incorporated in the State of Maryland, where it owns and operates a business that provides security management and supervision services. Broadway Services, Incorporated's primary place of business is in Baltimore City, Maryland and, upon information and belief, provides security management and supervision services to Prince George's Hospital Center.
5. At all relevant times hereto, Defendants William Reese, Donovan Scott, and Dwayne Williams were employed by Dimensions Health Corporation and/or Broadway Services, Incorporated as security guards at Prince George's Hospital Center located at 3001 Hospital Drive, Cheverly, Maryland 20785.
6. The venue for this action, including all claims contained herein, is proper in



Prince George's County, Maryland as a significant portion of the events that gave rise to this action took place in that County.

7. On June 23, 2010, at about 1:20 PM, Joseph L. Wheeler was involved in a serious car accident in St. Mary's County, Maryland where he sustained injuries.
8. Mr. Wheeler was transported from the scene of the accident to Prince George's Hospital Center via Maryland State Police Helicopter.
9. Mr. Wheeler was treated for blunt torso trauma with no acute injuries and cardiac chest pain on the evening of June 23, 2010 into the morning of June 24, 2010 at Prince George's Hospital Center. Mr. Wheeler was admitted as a patient to the hospital.
10. On June 24, 2010, at or about 1:00 PM, Mr. Wheeler, in a hospital bed, woke up and conversed with a nurse. Mr. Wheeler asked the nurse for something to eat, and the nurse told Mr. Wheeler that he could not eat because he was scheduled to have surgery later that day. Mr. Wheeler asked about what the surgery was for, and the nurse told him that she would check with a doctor.
11. At or about 1:40 PM, a doctor came into the room and became upset with Mr. Wheeler. The doctor told Mr. Wheeler that the surgery should have already been discussed with Wheeler, Wheeler will be fine, and that it was a small procedure. Mr. Wheeler did not get an answer about the surgery and became concerned.
12. At this time, the nurse came back into the room. Mr. Wheeler informed the nurse that he was concerned, the nurse checked his hospital-provided identification bracelet, and left the room.
13. At or about 2:10 PM, the nurse returned to Mr. Wheeler and told him that he was

going into surgery to have a potentially cancerous mass removed from his chest.

14. Mr. Wheeler immediately informed the nurse that he was being treated at Prince George's Hospital Center as a result of car accident and was not at the hospital for cancer treatment. The nurse apologized and that was all she was told and she subsequently left the room.
15. After the nurse left the room, Mr. Wheeler became very concerned. He looked down and checked his hospital identification bracelet to find that the hospital had misidentified him. The bracelet contained a name that was different from Mr. Wheeler's, appeared to be that of a woman, and had a birth date that was 13 years prior to his own.
16. Mr. Wheeler, still in serious pain from the car accident and subsequent treatment from injuries sustained, was starting to fear for his safety as the hospital had misidentified him and he was being prepped to go into a surgery that he knew nothing about.
17. At this point, Mr. Wheeler's wife, Felicia Ann Wheeler, came into the room to see her husband. Mr. Wheeler immediately told Mrs. Wheeler about what was taking place. The Wheelers decided that it was in their best interest to leave Prince George's Hospital Center and seek medical care for Mr. Wheeler elsewhere.
18. Mrs. Wheeler then confirmed what Mr. Wheeler had told her about the cancer surgery with the nurses outside of Mr. Wheeler's room. When Mrs. Wheeler told them that the Wheelers were leaving, an argument ensued.
19. Mr. Wheeler, hearing the argument, took out his I/V, got out of the hospital bed,

put his clothes on, and started to walk out of the room. He was bleeding from the spot on his hand where that I/V had been connected.

20. Mrs. Wheeler and the nurse met Mr. Wheeler at the door. The nurse told Mr. Wheeler that he was not allowed to leave. She put a bandage on Mr. Wheeler's hand to stop the bleeding from the I/V spot, and then yelled for security.
21. Mr. Wheeler, now bandaged and clothed, began to walk toward the exit of the floor while his wife gathered the rest of his belongings. As he moved toward the exit, two large men in security uniforms moved quickly toward Mr. Wheeler.
22. The two men were Prince George's Hospital Center Security Officers William Reese and Donovan Scott.
23. Officer Reese and Officer Scott confronted Mr. Wheeler and blocked Wheeler's path to the exit. The tone of the conversation that ensued between Officers Reese and Scott and Mr. Wheeler was immediately hostile.
24. Defendant Scott harshly asked, "Where do you think you're going?" Mr. Wheeler told both Reese and Scott that his business was finished at the hospital and that he was on his way out.
25. In the moments immediately following this exchange, Defendant Scott began to appear angry and upset with Mr. Wheeler. He began to use profanity directed at Mr. Wheeler about getting back to Wheeler's "damn room."
26. At this point the two officers put on black padded gloves in front of Mr. Wheeler and Defendant Scott started to hit his fist against his own hand and moved closer in proximity to Wheeler's face. Defendant Scott appeared angry and agitated.
27. Mr. Wheeler, in fear for his safety, attempted to reason with Reese and Scott.

He told the officers that he had been in a serious car accident and suffered from multiple injuries to the torso and shoulders.

28. Wheeler also told the officers that he was retired from the St. Mary's County Sheriff's Office and that he knew that the security officers had no right or authority to detain him. Wheeler stated that he wanted to leave.
29. Immediately after this exchange, Mr. Wheeler took a step toward the door. Defendant Scott grabbed Wheeler and shoved Wheeler hard from behind into the adjacent wall and metal railing, thus causing Wheeler to be struck in the left side of the ribs by the metal railing.
30. Mr. Wheeler, in serious pain and feeling like he was going to blackout, fell to the floor. Defendant Scott stood over him and yelled, "Get off the floor bitch! This game is over!"
31. Defendant Scott continued, "I don't care who you think you are, this is my camp, you listen to what I got to say!" The vocal officer then grabbed Mr. Wheeler and pulled him up off of the ground as Wheeler pleaded with the officer to stop hurting him.
32. At this point the Defendant Reese said to the vocal officer, "Man, ease up on him. He might really be hurt." Defendant Scott replied, "Hell no, he don't come up in here and be telling us what the fuck to do!"
33. Officers Reese and Scott proceeded to "escort" Mr. Wheeler back to his hospital room, while Defendant Scott gripped Wheeler's left arm so tight that it hurt.
34. As Wheeler and the two officers got to another exit door on their way back to Wheeler's hospital room, Defendant Scott accused Wheeler of attempting to push

the second officer down a flight of stairs. Defendant Scott continued to shout expletives at Wheeler.

35. In the subsequent moments, although the men never went up or down floors during the exchange, the two officers took Wheeler into the elevator and let the door shut. Mrs. Wheeler asked to go with her husband, but was told she could not go into the elevator with her husband and to, "Stand back."
36. Officers Reese and Scott "dropped" Wheeler onto the floor of the elevator. Wheeler, in serious pain and again feeling like he was going to pass out, went into the fetal position and wrapped his arms around his body to protect himself.
37. While Wheeler was in the fetal position, Defendant Scott struck Wheeler multiple times in the left arm as the vocal officers yelled multiple times, "Bitch, give me your arm!" Defendant Reese told the vocal officer "don't do this."
38. Officers Reese and Scott then picked Mr. Wheeler up off the floor, and they were holding him up in place.
39. The elevator door opened, and Mrs. Wheeler saw what was taking place. She pleaded with Officers Reese and Scott to "take it easy" with Mr. Wheeler, because Mr. Wheeler had just been in a serious car accident. Defendant Scott told Mrs. Wheeler, "Stand back out of the way. We are handling this."
40. Next, Officers Reese and Scott and Mr. Wheeler proceeded out of the elevator to the nurse's station where someone identified as a "Lieutenant" with Prince George's Hospital Center Security (herein after "the Lieutenant") was waiting. The Lieutenant told Mr. Wheeler that he was the officers' supervisor. The Plaintiffs do not know the name of the Lieutenant at this time.

41. The Lieutenant initially asked Wheeler why he was not cooperating with his officers, and then Wheeler asked the Lieutenant if they could speak in private. The Lieutenant agreed.
42. Mr. Wheeler and the Lieutenant then went to a private room where Wheeler told the Lieutenant about everything that had happened from the time Wheeler woke up in the hospital bed to the time that Wheeler and the Lieutenant were speaking.
43. Wheeler told the Lieutenant, something to the effect that "there must have been some kind of mix up going on." Wheeler went on to explain that he was told that he was going into surgery. Wheeler told the Lieutenant that he had been shoved into the wall, grabbed and pulled in the hallway, and beaten in the elevator.
44. After Mr. Wheeler explained what had happened, the Lieutenant looked at Wheeler's hospital-provided identification bracelet and acknowledged that Wheeler had been misidentified.
45. The Lieutenant wrote down Wheeler's name, date of birth, home address, and home and mobile phone numbers.
46. The Lieutenant then told Wheeler that he was going to take off the old identification bracelet, get Wheeler a new bracelet with the right information, and take Wheeler back to his room.
47. Mr. Wheeler, in serious pain and in fearing for his safety, told the Lieutenant that he was not going to return the bracelet and that he just wanted to leave Prince George's Hospital Center right away and seek treatment elsewhere.
48. Immediately after Mr. Wheeler made his intention to leave clear to the

Lieutenant, the Lieutenant appeared upset and yelled, "You do not tell me when you want to leave! You will leave when I tell you you can leave!"

49. Mr. Wheeler, feeling trapped, told the Lieutenant again that Wheeler needed to leave Prince George's Hospital Center and walked out of the room and started to move through the hallway back towards the elevator where Mrs. Wheeler was waiting.
50. In the hallway, Officer Reese, Officer Scott, and another Prince George's Hospital Center security guard Corporal Dwayne Williams moved toward Mr. Wheeler and stopped him per the Lieutenant's orders.
51. In fear for his safety, Mr. Wheeler took out his mobile phone and started to dial 911 to contact local police. One of the three security officers tried to wrestle the phone from Mr. Wheeler. Mrs. Wheeler ended up with the phone.
52. After the scuffle over Wheeler's attempt to call 911 and possession of the mobile phone, Dimensions Health Corporation employee Vaughn Barkdoll showed up on the scene and gave Wheeler a card that said that Barkdoll was "Vice President, Support Service" for "Dimensions Healthcare System."
53. Wheeler informed Barkdoll that Wheeler was being held against his will and wanted to leave the hospital.
54. As this conversation was taking place, Officers Reese and Scott, Corporal Williams, and the Lieutenant were all present. One of the officers mentioned placing Wheeler in a private room with restraints.
55. During this conversation, a woman in plain clothes, who appeared to be the highest-ranking Dimensions Health Corporation employee on the scene

(hereinafter the "Administrator"), arrived at the nurse's station and intervened in the conversation.

56. Mr. Wheeler told the Administrator what had taken place, and the Administrator pleaded with Wheeler to stay at the hospital and she would make sure Mr. Wheeler would have his own private room and any type of drug he wanted, just to name the pain killer. She said she would make sure he would get the drug or pain killer for him, just as long as Mr. Wheeler would stay. Mr. Wheeler refused, and continued to state that he just wanted to leave.
57. For the purpose of the Wheeler's leaving the hospital, the Administrator ordered Mr. Wheeler to sign a "Release From Responsibility Discharge Against Medical Advice" form. The Administrator made Mr. and Mrs. Wheeler promise that they would go to St. Mary's Hospital after they left Prince George's Hospital Center.
58. As Mr. Wheeler was in the process of signing, one of the security guards stated that it made no difference if Wheeler were to sign the release form since, according to the guard, a doctor needed to sign off. The Administrator told the guard no, that she could sign the form herself.
59. After Mr. Wheeler signed the release and was instructed to leave by the Administrator, Mr. and Mrs. Wheeler moved toward the elevator to leave Prince George's Hospital Center.
60. Officers Reese and Scott, Corporal Williams, and the Lieutenant stood together in a group in the hallway as the Wheeler's approached the exit.
61. As the Wheelers walked past Officers Reese and Scott, Corporal Williams, and the Lieutenant, the Lieutenant grabbed Mr. Wheeler's hand and wrist and

attempted to take the signed release form and hospital-provided identification bracelet with the wrong name from Wheeler. Wheeler was able to keep the form and bracelet.

62. Subsequently, Defendant Scott charged Wheeler, again calling Wheeler "bitch", and shoved him against the wall.
63. The Administrator saw this take place and ordered the Defendant Scott and the Lieutenant to leave the scene. The Administrator then ordered the second officer from before and Corporal Williams to escort the Wheeler's to the parking lot.
64. On the way to the parking lot, the Defendant Reese acknowledged to the Wheelers that the vocal officer is a "hot head." Defendant Reese apologized to the Wheeler's for what had occurred.
65. The Wheelers left Prince George's Hospital Center and went straight to St. Mary's Hospital in St. Mary's County, Maryland. Mr. Wheeler spent the next three days at St. Mary's Hospital and was diagnosed with four broken ribs, a sprained shoulder, a ruptured spleen, and a concussion.

**COUNT ONE**  
**Assault and Battery**

66. Plaintiff's, Joseph L. Wheeler and Felicia Ann Wheeler, adopt by reference the allegations contained in paragraphs 1 through 65 of this Complaint with the same effect as if herein fully set forth.
67. At all relevant times hereto, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant were employed by Dimensions Health Corporation and/or

Broadway Services, Incorporated as security guards at Prince George's Hospital Center located at 3001 Hospital Drive, Cheverly, Maryland 20785.

68. On June 24, 2010, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, while on duty as security guards at Prince George's Hospital Center, acting with malice threatened Plaintiff Joseph L. Wheeler with by means of physical force and verbal abuse at Prince George's Hospital Center; causing Wheeler, someone recently involved in a serious car accident, to formulate a reasonable belief that serious bodily harm was imminent.
69. On June 24, 2010, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, while on duty as security guards at Prince George's Hospital Center, without provocation, intentionally struck, grabbed, and shoved Plaintiff Joseph L. Wheeler multiple times inside Prince George's Hospital Center causing Wheeler to sustain severe injuries and aggravate other injuries sustained in a serious car accident the night before.
70. As William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant's employer, Dimensions Health Corporation and/or Broadway Services, Incorporated are responsible for all of the acts committed by William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant within the scope of their employment.

WHEREFORE, Plaintiffs Joseph L. Wheeler and Felicia Ann Wheeler demand judgment against Defendant Dimensions Health Corporation, Broadway Services, Incorporated, and William Reese, Donovan Scott, Dwayne Williams and the Lieutenant individually and as

agents of Dimensions Health Corporation and/or Broadway Services, Incorporated in the amount of \$1,500,000 in compensatory damages, \$3,000,000 in punitive damages, and such other and further relief as this Court deems proper.

**COUNT TWO**  
**False Imprisonment**

71. Plaintiff's, Joseph L. Wheeler and Felicia Ann Wheeler, adopt by reference the allegations contained in paragraphs 1 through 70 of this Complaint with the same effect as if herein fully set forth.
72. William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant were employed by Dimensions Health Corporation and/or Broadway Services, Inc. as security guards at Prince George's Hospital Center located at 3001 Hospital Drive, Cheverly, Maryland 20785.
73. On the afternoon of June 24, 2010, Plaintiff Joseph L. Wheeler stated clearly and plainly his intention to leave Prince George's Hospital Center to nurses, security guards, and other Dimensions Health Corporation and/or Broadway Services Incorporated employees.
74. Plaintiff Joseph L. Wheeler communicated clearly and plainly to William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant his intention to leave Prince George's Hospital Center.
75. Over the course of approximately three (3) hours, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant at Prince George's Hospital Center, without explanation, restrained Wheeler from leaving the hospital.

76. On multiple occasions, some or all of the abovementioned individuals made malicious comments toward Plaintiff Joseph L. Wheeler about Wheeler's desire to leave and Wheeler's status as a retired police officer.
77. Such action by William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant caused Plaintiff Joseph L. Wheeler to be deprived of his liberty to leave Prince George's Hospital Center.
78. After approximately three hours of being restrained against his will by the abovementioned agents of Dimensions Health Corporation and/or Broadway Services, Inc., Plaintiff Wheeler was told by another Dimensions Health Corporation and/or Broadway Services Incorporated agent, who appeared to have authority over the security guards (referred to above as "boss"), to sign a "Release From Responsibility Discharge Against Medical Advice" in order to exercise his right to leave the facility.
79. After signing the abovementioned release form, Plaintiff Joseph L. Wheeler travelled toward the exit of the hospital, release form in hand, and was restrained again by William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant attempted to grab the release form and hospital-provided identification bracelet from Wheeler's hand and wrist.
80. Despite following the Administrator's directions, Plaintiff Joseph L. Wheeler continued to be unlawfully deprived of his liberty to leave the hospital, until the Administrator ordered the security guards to stop restraining Wheeler.
81. As a result of the actions of William Reese, Donovan Scott, Dwayne Williams, and/or the Lieutenant, Plaintiff Joseph L. Wheeler suffered significant damages by

being unlawfully held against his will for an extended period of time.

82. William Reese, Donovan Scott, Dwayne Williams, and/or the Lieutenant, through their actions demonstrated actual malice towards Plaintiff Joseph L. Wheeler.

83. As William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant's employer, Dimensions Health Corporation and/or Broadway Services, Incorporated is responsible for all of the acts committed by Reese, Scott, Williams, and the Lieutenant within the scope of their employment.

WHEREFORE, Plaintiffs Joseph L. Wheeler and Felicia Ann Wheeler demand judgment against Defendant Dimensions Health Corporation, Broadway Services, Incorporated William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, individually and as agents of Dimensions Health Corporation and/or Broadway Services, Incorporated in the amount of \$1,500,000 in compensatory damages, \$3,000,000 in punitive damages, and such other and further relief as this Court deems proper.

**COUNT THREE**  
**Intentional Infliction of Emotional Distress**

84. Plaintiff's, Joseph L. Wheeler and Felicia Ann Wheeler, his wife, adopt by reference the allegations contained in paragraphs 1 through 83 of this Complaint with the same effect as if herein fully set forth.

85. As mentioned above, Plaintiff Joseph L. Wheeler, less than 24 hours after being involved in a serious car accident, was assaulted and battered by one or more of the Defendants, including William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant.

86. Plaintiff Felicia Ann Wheeler witnessed her husband being grabbed, shoved,



struck, and verbally assaulted by the officers.

87. William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant engaged in intentional conduct, or in the alternative reckless conduct, with deliberate disregard of the high degree of probability that emotional distress would result to the Plaintiff's Joseph L. Wheeler and Felicia Ann Wheeler.
88. The aforesaid conduct of William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, in assaulting and battering a man who was at Prince George's Hospital Center Shock Trauma for treatment, was extreme and outrageous.
89. As a result as the aforesaid conduct and actions, both Joseph L. and Felicia Ann Wheeler have suffered, and will continue to suffer from, severe and extreme emotional distress.
90. As William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant's employer, Dimensions Health Corporation and/or Broadway Services, Incorporated is responsible for all of the acts committed by Reese, Scott, Williams, and the Lieutenant within the scope of their employment.

WHEREFORE, Plaintiffs Joseph L. Wheeler and Felicia Ann Wheeler demand judgment against Defendant Dimensions Health Corporation, Broadway Services, Incorporated, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, individually and as agents of Dimensions Health Corporation and/or Broadway Services, Incorporated in the amount of \$1,000,000 in compensatory damages, \$2,500,000 in punitive damages, and such other and further relief as this Court deems proper.

**COUNT FOUR**  
**Loss of Consortium**



91. Plaintiff's, Joseph L. Wheeler and Felicia Ann Wheeler, his wife, adopt by reference the allegations contained in paragraphs 1 through 90 of this Complaint with the same effect as if herein fully set forth.
92. Plaintiffs were husband and wife at the time of the events described in this Complaint. They were married on May 10, 2008.
93. The intentional conduct of William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant and Dimensions Health Corporation and/or Broadway Services, Incorporated agents, more specifically described in Counts One through Three of this Complaint, caused injury to the marital relationship of Plaintiffs, including loss of society, affection, assistance, companionship, and of sexual relations.

WHEREFORE, Plaintiffs Joseph L. Wheeler and Felicia Ann Wheeler demand judgment against Defendant Dimensions Health Corporation, Broadway Services, Incorporated, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant, individually and as agents of Dimensions Health Corporation and/or Broadway Services, Incorporated in the amount of \$200,000 in compensatory damages, with interests and costs, and such other and further relief as this Court deems proper.

**COUNT FIVE**  
**Respondeat Superior**

94. Plaintiff's, Joseph L. Wheeler and Felicia Ann Wheeler, his wife, adopt by reference the allegations contained in paragraphs 1 through 93 of this Complaint with the same effect as if herein fully set forth.
95. At all times relevant hereto, William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant were employed by Dimensions Health Corporation and/or

Broadway Services, Incorporated.

96. Defendants William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant committed various wrongful acts against Plaintiffs, including but not limited to assault, battery, false imprisonment, and intentional infliction of emotional distress, as more fully described above.
97. Defendants William Reese, Donovan Scott, Dwayne Williams, and the Lieutenant committed the wrongful acts and/or omissions within the scope of their employment for either Defendant Dimensions Health Corporation, Broadway Services, Incorporated, or both, in that these wrongful acts and/or omissions were committed while they were on duty, they occurred at Prince George's County Hospital Center, and in further of said corporate Defendants' interests.

WHEREFORE, Plaintiffs Joseph L. Wheeler and Felicia Ann Wheeler demand judgment against Defendants Dimensions Health Corporation and Broadway Services, Incorporated, in the amount of \$1,000,000 in compensatory damages, \$2,500,000 in punitive damages and such other and further relief as this Court deems proper.

Respectfully Submitted,

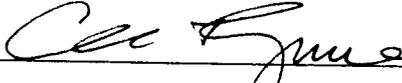


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Attorneys for the Plaintiff



**JURY DEMAND**

The Plaintiffs hereby demand and elect a trial by jury on all claims and issues raised herein pursuant to Maryland Rule 2-325.



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