

TO: CHESAPEAKE GENERAL DISTRICT COURT, CIVIL DIVISION - CLERK'S OFFICE

PLEASE FILE THIS DOCUMENT AS MY GROUNDS OF DEFENSE IN THE BELOW MATTER. THANK YOU. *Susan Pullem*

7/17/91  
GROUND OF DEFENSE

6/13/91

In the Case of:

Javaid A. Perwaiz, M.D., Plaintiff

v.

Susan M. Pullem, Defendant

This case was originally scheduled for Thursday, June 13, 1991 at 9:00 a.m. in the Chesapeake General District Court, Civil Division. I appeared before the court on this date and contested the matter. The case has been continued until **Wednesday, July 17, 1991 at 9:00 a.m.** Linda N. Huss is the attorney for the Plaintiff.

The following is my grounds of defense:

I do not feel that I owe Dr. Perwaiz the \$1,140.00 he states I owe him because the surgeries performed by Dr. Perwaiz on myself were not only unnecessary, but irreversible. The following facts will defend my allegations. If necessary, my present physician, Dr. Frank Denaro, would be willing to testify on my behalf in court.

As you can see from the enclosed medical records, from April 1987 to July 1988, Dr. Perwaiz performed laser surgery on me six (6) times (including 2 DNC's) before finally performing a partial hysterectomy on me in October of 1988. Dr. Perwaiz assured me that the hysterectomy was necessary and that I would not experience any more problems afterwards; that this would take care of the problem. However, I did have intermittent spotting after the surgery and when I went back to Dr. Perwaiz in February 1989, he told me that he would have to perform more laser surgery. It was at this time that I finally became suspicious and uneasy; therefore, I went to another OB-GYN doctor for a second opinion. When I went to this doctor (Dr. Frank Denaro), I explained to him everything I had been through and the problems I was experiencing now with the spotting. I did not mention Dr. Perwaiz' name, but I did tell Dr. Denaro that the other doctor wanted to perform laser surgery again. He was astounded. He said that the lining of my vagina was paper thin now and he couldn't believe that the other doctor wanted to operate again. He gave me some intra-vaginal hormone cream to correct the problem and to help re-build the lining of my vagina. Within two (2) weeks, when I returned to Dr. Denaro, the lining of my vagina had improved tremendously. I questioned Dr. Denaro about all of my previous surgeries and the hysterectomy. He said that he felt like it was unnecessary; that surgery should always be a last resort and if he had been seeing me, he would have treated me with medication, not surgery. I called another local OB-GYN physician and questioned him on my situation, again without naming names. He said it would be difficult to answer something like that over the phone, but judging by what I had told him, he felt like Dr. Denaro did. Obviously, Dr. Perwaiz didn't feel the same way. I feel betrayed by Dr.

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Perwaiz and the confidence and trust that I put in him. He led me to believe that he was my friend and was looking out for my best interests and my health. Also, after my hysterectomy and while still in the hospital, I had trouble breathing. I mentioned this to Dr. Perwaiz and he gave me the impression that he just thought it was air bubbles or gas; however, I insisted that I was experiencing difficulty in breathing and that he see what was wrong. He called in a doctor to take blood from my artery, and the doctor said that there was more than the normal amount of oxygen in my blood, so they x-rayed me. Everything appeared to be normal. However, in December 1989 my left lung collapsed and I was hospitalized and had to have a chest tube. Again, in August 1990, the same lung collapsed and I had surgery. Having been through this experience twice, I am very familiar with how it feels and I am certain that my lung had a small puncture after my hysterectomy. I also know that sometimes these holes cannot be seen on an x-ray and can heal themselves, but will leave a weak spot in the lung. I feel that this is what happened to me. I know you may think this is just speculation, but having been through it twice, I feel sure that this is what happened to me. Hospital records can verify this information.

I'm sure you are probably asking yourself why I allowed Dr. Perwaiz to perform all of the surgeries. I have asked myself that question alot too. The only answer I have is that at the time all of this was happening to me, I was going through a very bad divorce and my emotional state was naturally not at its best. Also, Dr. Perwaiz led me to believe that he really cared about my health and he even told me that he was not "knife happy". Most people, especially women, hold their physicians in the highest esteem and literally put their life in the doctor's hands. This was the case with me; after all, he told me he was my friend and that he was looking out for my best interests. If only I knew.

Since I have stopped going to Dr. Perwaiz, I have heard of, and from, dozens of women who have had similar or near-identical experiences with him. It seems that the majority of women who go to him undergo laser surgery for one reason or another. Doesn't that seem ironic? One lady I know of can't have children now because of all of the surgeries. He performed a hysterectomy on another woman approximately 10 years ago, and while he was removing the uterus, he cut her bladder. However, he didn't even notice it and completed the surgery. This same woman was recently hospitalized again with complications from that surgery 10 years ago. Another girl of 18 who went to him for a checkup before getting married was advised that she too needed laser surgery. These are just a few of the people I know of and they would all be more than willing to verify what I have said. I just thank God that I finally came to my senses and don't see him anymore. I wish there was a way to revoke his license - he is dangerous! I think he takes advantage of the trust and faith that women put in him and makes them believe that they need to have this surgery, when in most cases, medication would probably give the required results.

When I went to Dr. Denaro and found out that not only my hysterectomy, but probably most of the laser surgeries were unnecessary, I was extremely upset. However, I had recently remarried and did not want to get involved in a malpractice suit; I just wanted to forget it ever happened. As you can see from the enclosed copy of a letter I wrote to Dr. Perwaiz in October 1990, I finally decided that he didn't deserve the money I still owed him for what he did to me. He robbed me of the chance to ever have children again. And not

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only that, but he wanted to further damage me with more surgery after the hysterectomy. I told Dr. Perwaiz in this letter that I wasn't going to pay him any more money. As far as I was concerned, he has received enough "blood" money from me and the insurance companies; he could write the rest of it off. However, he chose not to do that. He is suing me for the remaining balance on the account (\$1,100.00). I have talked to a lawyer concerning this matter and because of the 2 year statute of limitations for malpractice, I cannot counter-sue Dr. Perwaiz for malpractice. I never intended to sue him for malpractice, or I would have done it before the statute ran out. I was hoping that it would not come down to this because my husband and I have just been in court for the last year in trying to obtain custody of his daughter from a previous marriage. Needless to say, we are broke and tired of being in court. I know that I can't sue Dr. Perwaiz for malpractice, but I am going to do everything in my power to see that he can't do to someone else what he did to me.

On June 4, 1991, I sent a letter to the State Medical Board and the Portsmouth Academy of Medicine asking them to investigate Dr. Perwaiz.

I hope that the courts will look at all of the evidence presented and come to the same conclusion that I have. Dr. Perwaiz is a disgrace to his profession and has taken advantage of trusting women for too long. Between the monies paid him by myself and the insurance companies, I feel he has been paid very well indeed for ruining my life.

Sincerely,

*Susan M. Pullem*

Susan M. Pullem  
(formerly Vaughan)

Enclosures

cc: Dr. Javid A. Perwaiz  
Linda N. Huss, Esquire