

EXHIBIT XI.

Law Offices of Terri D. Mason

(re: Michael Kapneck)

To: Clifton T. Perkins Hospital Center

February 18, 2021

EXHIBIT FACTS/INFO. SHEET



*Due to time constraints, the page herein has not been fully constructed. The “Facts/Info. Sheet” was designed to assist the Finder of Fact when considering exculpatory /substantive information extracted from the following exhibit.

*See Exhibit IV. for a completed “Facts/Info. Sheet”



Law Offices of
Terri D. Mason, P.C.

Via Email - m [REDACTED]

February 18, 2021

M [REDACTED] CEO
Clifton T. Perkins Hospital Center
8450 Dorsey Run Road
Jessup, Maryland 20794

RE: Michael Kapneck

Dear Ms. Fogan:

The Law Offices of Terri D. Mason and Terri D. Mason represent Michael Kapneck in our capacity as the Legal Assistance Provider, *hereinafter LAP*, for patients at Clifton T. Perkins Hospital, *hereinafter CTPHC*. As the LAP, per our contract with MDH, we are required to work within the framework of the RGS to address alleged violations of patients' rights.

This LAP is representing Mr. Kapneck concerning many of the numerous grievances -30 plus - that he has filed through the RGS. Some of the grievances have been found valid which has led to action from the facility ranging from reprimands to staff educations. Regardless of the outcome of the grievances, one thing is certain, something is amiss that requires our immediate attention. The grievances have presented a pattern of alleged harassment and retaliation by staff. The relationship between Mr. Kapneck and staff has deteriorated into mutual threats and verbal assaults thereby hindering any clinical progress. The situation has escalated into Mr. Kapneck being physically assaulted. In addition, he has been threatened with chemical restraints as addressed in the correspondence from Disability Rights of

Ma [REDACTED], CEO Letter

February 18, 2021

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Maryland dated February 11, 2021. For your convenience and reference, please see a copy of the correspondence attached.

Due to circumstances expressed in the preceding paragraph and confidential information provided to this LAP, the LAP has reason to believe that Mr. Kapneck's physical safety is compromised. Please be assured that the purpose of this letter is not to condemn the facility but to bring an imminent threat to your attention that places Mr. Kapneck and staff at substantial risk for harm. As Mr. Kapneck's safety and wellbeing are our joint responsibilities, I am hopeful that we can work cooperatively to protect Mr. Kapneck and staff. Thank you for your willingness to meet with me and other stakeholders today regarding this matter of great urgency.

Should you have any questions or require any additional information, please feel free to contact me. I look forward to speaking with you further and developing a strategy to remedy this situation.

Kind Regards,

Law Offices of Terri D. Mason, P.C.

[REDACTED]
Terri D. Mason

cc: [REDACTED] C [REDACTED], Director of the RGS