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January 30, 2025

Michael Baram, Esq.

General Counsel

Nimmo & Associates Fertility Clinic

275 Cambridge Street

Boston, MA 02114

Re: Settlement Demand - Richards v. Nimmo Fertility Clinic

Medical Malpractice Claim

Our Client: Jennifer and Michael Richards

Dear Mr. Baram:

This letter serves as formal notice of our clients' medical malpractice claim against Nimmo & Associates Fertility Clinic and Dr. Edwin Nimmo arising from the negligent fertility treatment provided to Jennifer Richards during 2023-2024.

FACTUAL BACKGROUND:

Our clients, Jennifer and Michael Richards, sought fertility treatment at your clinic beginning in March 2023. After extensive testing, Dr. Nimmo recommended in vitro fertilization (IVF) treatment.

Mrs. Richards underwent three IVF cycles between June 2023 and February 2024. During the third cycle, Dr. Nimmo negligently:

1. Failed to properly monitor hormone levels during stimulation
2. Administered excessive dosages of fertility medications
3. Proceeded with egg retrieval despite warning signs of OHSS
4. Failed to obtain informed consent for experimental protocols

As a direct result of this negligence, Mrs. Richards developed severe Ovarian Hyperstimulation Syndrome (OHSS) requiring emergency hospitalization and surgical intervention.

MEDICAL NEGLIGENCE:

Our medical expert, Dr. Sarah Chen, a board-certified reproductive endocrinologist from Harvard Medical School, has reviewed the medical records and will testify that Dr. Nimmo's treatment fell below the applicable standard of care in multiple respects:

• Failure to monitor estradiol levels during stimulation cycle