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Baltimore Washington DC New York

February 22, 2013

VIA HAND DELIVERY

Paul B. Rothman, M.D.
Dean of the Johns Hopkins Medical Faculty
Chief Executive Officer, Johns Hopkins Medicine
600 North Wolfe Street
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Baltimore, Maryland 21287

Ronald R. Peterson
President
The Johns Hopkins Hospital and Health System
Executive Vice President, Johns Hopkins Medicine
600 North Wolfe Street
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Gentlemen:

The Maryland Crime Victims Resource Center, Inc. ("MCVRC") and the law firm of Silverman Thompson Slutkin & White, LLC ("STSW") jointly write on behalf of various individual victims who have requested assistance from MCVRC and over 100 STSW clients who were patients of Nikita A. Levy, M.D. while he was employed by the Johns Hopkins Health System ("Johns Hopkins"). On February 18, 2013, Johns Hopkins informed the media and a small group of Dr. Levy's patients that some of those patients had been illegally (and without the patients' consent) videotaped and photographed by Dr. Levy in the course of providing gynecologic and/or obstetric care at Johns Hopkins. Police subsequently announced that a search warrant of Dr. Levy's home revealed an extensive number of covert video recording devices and an "extraordinary" amount of digital images and video contained on multiple hard drives and servers, which obviously involve a large number of patients over an extensive time-frame. To date, you have not provided any additional information to these potential victims such as the time frame during which these invasions of privacy occurred, the means by which these images were procured and/or whether you are in possession of evidence that Dr. Levy disseminated these images to any other individual or entity.

As we are sure you can appreciate, this partial disclosure has resulted in untold anxiety and emotional distress among our clients who are left to wonder whether they have been victimized by an individual and hospital with whom they had developed long-standing trust, and perhaps more importantly, whether these pictures and images depicting them at their most vulnerable moments

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have been disseminated for the world to see via the Internet or by other means. We understand you are actively investigating this matter. However, to alleviate our respective clients' anxiety, we believe it is incumbent upon you to publicly pledge to provide the following:

- 1. An assurance that any victim who has been identified in a video or image will be promptly and confidentially notified and provided with as much information as possible;
- 2. Notification as to whether there currently is any evidence that Dr. Levy distributed images of any of the victims in any manner;
- 3. An assurance that the victims promptly will be informed should any information concerning any distribution of the images become available;
- 4. An assurance that all video and images depicting them are being segregated and securely maintained such that only appropriate law enforcement officials have access; and
- 5. Notification as to what procedures Johns Hopkins has in place and/or implemented to ensure that other patients' privacy and dignity are being protected hospital-wide.

We believe these requests are both reasonable and consistent with Maryland's crime victim rights and privacy laws. We would be happy to discuss any mechanism by which any or all of your organizations may provide this information to our clients through a mutually acceptable means. However, because our clients' anxiety is compounded each day they are left with uncertainty, we implore your immediate attention and we look forward to your prompt reply.

Very truly yours,

Andrew G. Slutkin, Esquire Jamison G. White, Esquire

Steven J. Kelly, Esquire

SILVERMAN THOMPSON SLUTKIN & WHITE, LLC

Russell P. Butler, Executive Director Maryland Crime Victims'

RESOURCE CENTER, INC.

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