

Jamie Wright, J.D., Chair
Panel A

KAMALA D. HARRIS
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
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Attorneys for Complainant

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**GUNJAN GOEL, M.D.
200 W Arbor Dr. #8893
San Diego, CA 92103**

**Physician's and Surgeon's Certificate No.
A122057**

Respondent.

Case No. 800-2014-005548

OAH No. 2015100113

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

PARTIES

1. Kimberly Kirchmeyer (complainant) is the Executive Director of the Medical Board of California. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Karolyn M. Westfall, Deputy Attorney General.

2. Respondent Gunjan Goel, M.D. (respondent) is represented in this proceeding by attorney Richard D. Barton, Esq. and Natalie V. Mueller, Esq., whose address is: 12544 High Bluff Drive, Suite 300, San Diego, CA 92130.

3. On or about July 18, 2012, the Medical Board of California (Board) issued Physician's and Surgeon's Certificate No. A122057 to respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges and allegations brought in Accusation No. 800-2014-005548 and will expire on June 30, 2016, unless renewed.

JURISDICTION

4. On August 26, 2015, Accusation No. 800-2014-005548 was filed against respondent before the Board, and is currently pending against respondent. A true and correct copy of Accusation No. 800-2014-005548 and all other statutorily required documents were properly served on respondent at her address of record with the Board. A true and correct copy of Accusation No. 800-2014-005548 is attached hereto as Exhibit A and incorporated herein by this reference as if fully set forth herein. Respondent timely filed her Notice of Defense contesting the Accusation. A true and correct copy of respondent's Notice of Defense and Special Notice of Defense is attached hereto as Exhibit B and incorporated herein by this reference as if fully set forth herein.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2014-005548. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in Accusation No. 800-2014-005548; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

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1 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and
2 Disciplinary Order, the Board may receive oral and written communications from its staff and/or
3 the Attorney General's Office. Communications pursuant to this paragraph shall not disqualify
4 the Board, any member thereof, and/or any other person from future participation in this or any
5 other matter affecting or involving respondent. In the event that the Board does not, in its
6 discretion, approve and adopt this Stipulated Settlement and Disciplinary Order, with the
7 exception of this paragraph, it shall not become effective, shall be of no evidentiary value
8 whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party
9 hereto. Respondent further agrees that should this Stipulated Settlement and Disciplinary Order
10 be rejected for any reason by the Board, respondent will assert no claim that the Board, or any
11 member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this
12 Stipulated Settlement and Disciplinary Order or of any matter or matters related hereto.

13 **ADDITIONAL PROVISIONS**

14 14. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
15 be an integrated writing representing the complete, final, and exclusive embodiment of the
16 agreements of the parties in the above-entitled matter.

17 15. The parties agree that copies of this Stipulated Settlement and Disciplinary Order,
18 including copies of the signatures of the parties, may be used in lieu of original documents and
19 signatures and, further, that such copies shall have the same force and effect as originals.

20 16. In consideration of the foregoing admissions and stipulations, the parties agree the
21 Board may, without further notice to or opportunity to be heard by respondent, issue and enter the
22 following Disciplinary Order:

23 **DISCIPLINARY ORDER**

24 **A. PUBLIC REPRIMAND**

25 IT IS HEREBY ORDERED that respondent Gunjan Goel, M.D.'s, Physician's and
26 Surgeon's Certificate No. A122057, shall be and is hereby Publicly Reprimanded pursuant to
27 California Business and Professions Code section 2227, subdivision (a)(4). This Public
28 Reprimand, which is issued in connection with Accusation No. 800-2014-005548, is as follows:

You used marijuana on three (3) to four (4) occasions from approximately July 2014, through December 2014, while on vacation, without having been issued a State of California medical marijuana identification card.

B. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of the effective date of this Decision, respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CCR) section 1358. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

A professionalism program taken after the acts that gave rise to the charges in the Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the program would have been approved by the Board or its designee had the program been taken after the effective date of this Decision.

Respondent shall submit a certification of successful completion to the Board or its designee not later than 15 calendar days after successfully completing the program or not later than 15 calendar days after the effective date of the Decision, whichever is later.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and, having the benefit of counsel, enter into it freely, voluntarily, intelligently, and with full knowledge of its force and effect on my Physician's and Surgeon's Certificate A122057. I fully understand that, after signing this stipulation, I may not withdraw from it, that it shall be submitted to the Medical Board of California for its consideration, and that the Board shall have a reasonable period of time to consider and act on this stipulation after receiving it. By entering into this stipulation, I

1 fully understand that, upon formal acceptance by the Board, I shall be publicly reprimanded by
2 the Board and shall be required to comply with all of the terms and conditions of the Disciplinary
3 Order set forth above. I also fully understand that any failure to comply with the terms and
4 conditions of the Disciplinary Order set forth above shall constitute unprofessional conduct and
5 will subject my Physician's and Surgeon's Certificate No. A122057 to further disciplinary action.

6
7 DATED:

16th May 2016 

GUNJAN GOEL, M.D.
Respondent

9 I have read and fully discussed with respondent Gunjan Goel, M.D. the terms and
10 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
11 I approve its form and content.

12 DATED: _____

RICHARD D. BARTON, ESQ.
Attorney for Respondent

14
15 **ENDORSEMENT**

16 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
17 submitted for consideration by the Medical Board of California.

18 Dated:

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Complainant

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1 fully understand that, upon formal acceptance by the Board, I shall be publicly reprimanded by
2 the Board and shall be required to comply with all of the terms and conditions of the Disciplinary
3 Order set forth above. I also fully understand that any failure to comply with the terms and
4 conditions of the Disciplinary Order set forth above shall constitute unprofessional conduct and
5 will subject my Physician's and Surgeon's Certificate No. A122057 to further disciplinary action.

6
7 DATED: _____

GUNJAN GOEL, M.D.
Respondent

9 I have read and fully discussed with respondent Gunjan Goel, M.D. the terms and
10 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
11 I approve its form and content.

12 DATED: May 16, 2016

 on behalf of:
13 RICHARD D. BARTON, ESQ. *Richard D Barton*
Attorney for Respondent

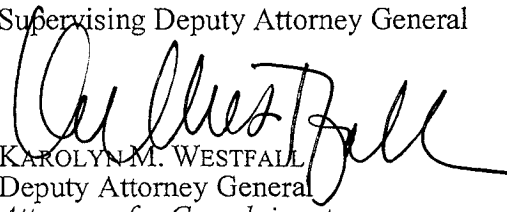
14
15 **ENDORSEMENT**

16 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
17 submitted for consideration by the Medical Board of California.

18 Dated: 5/16/16

Respectfully submitted,

19 KAMALA D. HARRIS
Attorney General of California
20 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

21 
22 KAROLYN M. WESTFALL
23 Deputy Attorney General
24 Attorneys for Complainant

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Exhibit A

Accusation No. 800-2014-005548

1 KAMALA D. HARRIS
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 KAROLYN M. WESTFALL
Deputy Attorney General
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Telephone: (619) 645-3121
7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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11

12

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

13

In the Matter of the Accusation Against:

Case No. 800-2014-005548

14

Gunjan Goel, M.D.
200 W Arbor Dr. #8893
San Diego, CA 92103

A C C U S A T I O N

15

16

Physician's and Surgeon's Certificate
No. A122057,

17

Respondent.

18

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Complainant alleges:

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PARTIES

21

1. Kimberly Kirchmeyer (complainant) brings this Accusation solely in her official
22 capacity as the Executive Director of the Medical Board of California, Department of Consumer
23 Affairs.

24

2. On or about July 18, 2012, the Medical Board of California (Board) issued
25 Physician's and Surgeon's Certificate No. A122057 to Gunjan Goel, M.D. (respondent).
26 Respondent's Physician's and Surgeon's Certificate No. A122057 was in full force and effect at
27 all times relevant to the charges brought herein and will expire on June 30, 2016, unless renewed.

28

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FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO August 26 2015
BY K. Voong ANALYST

JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2227 of the Code states:

“(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the division, may, in accordance with the provisions of this chapter:

“(1) Have his or her license revoked upon order of the board.

“(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

“(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

“(4) Be publicly reprimanded by the board.

“(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

“(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the division and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.”

5. Section 2234 of the Code states, in pertinent part:

“The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

1 “(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting
2 the violation of, or conspiring to violate any provision of this chapter [Chapter 5, the
3 Medical Practice Act].

4 “...”

5 6. Unprofessional conduct under Business and Professions Code section 2234 is conduct
6 which breaches the rules or ethical code of the medical profession, or conduct which is
7 unbecoming a member in good standing of the medical profession, and which demonstrates an
8 unfitness to practice medicine. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564,
9 575.)

10 7. Section 2238 of the Code states:

11 “A violation of any federal statute or federal regulation or any of the statutes
12 or regulations of this state regulating dangerous drugs or controlled substances
13 constitutes unprofessional conduct.”

14 8. Section 2239 of the Code states, in pertinent part:

15 “(a) The use or prescribing for or administering to himself or herself, of any
16 controlled substance; or the use of any of the dangerous drugs specified in Section 4022, or
17 of alcoholic beverages, to the extent, or in such a manner as to be dangerous or injurious to
18 the licensee, or to any other person or to the public, or to the extent that such use impairs
19 the ability of the licensee to practice medicine safely or more than one misdemeanor or any
20 felony involving the use, consumption, or self administration of any of the substances
21 referred to in this section, or any combination thereof, constitutes unprofessional conduct.
22 The record of the conviction is conclusive evidence of such unprofessional conduct.

23 “...”

24 9. Section 11170 of the Health and Safety Code states, “No person shall prescribe,
25 administer, or furnish a controlled substance for himself.”

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1 (c) On or about January 23, 2015, respondent's urine sample revealed negative results for
2 marijuana.

3 (d) On or about February 10, 2015, respondent's hair sample revealed positive results for
4 THC² Metabolite.

5 (e) On or about May 15, 2015, respondent appeared at the DOI HQIU field office for a
6 subject interview. During that interview, respondent admitted consuming marijuana on three (3)
7 to four (4) occasions from approximately July, 2014, through December, 2014. Respondent
8 admitted using marijuana on those occasions socially with friends. Respondent denied having a
9 California State issued medical marijuana identification card.³

10 **SECOND CAUSE FOR DISCIPLINE**

11 **(Violation of State Laws Regulating Dangerous Drugs and/or Controlled Substances)**

12 12. Respondent is further subject to disciplinary action under sections 2227 and 2234, as
13 defined by section 2238, of the Code, in that she has violated a state law or laws regulating
14 dangerous drugs and/or controlled substances, as more particularly alleged hereinafter:

15 (a) Paragraphs 11(a) through (e), above, are hereby incorporated by reference and
16 realleged as if fully set forth herein.

17 (b) Respondent repeatedly administered to herself controlled substances, in violation of
18 section 2239 of the Code, and Health and Safety Code section 11170.

19 (c) Respondent repeatedly possessed marijuana, in violation of Health and Safety Code
20 section 11357.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(General Unprofessional Conduct)**

23 13. Respondent is further subject to disciplinary action under sections 2227 and 2234 of
24 the Code, in that she has engaged in conduct which breaches the rules or ethical code of the

25 ² THC, or tetrahydrocannabinol, is one of many compounds found in the resin secreted by glands
26 of the marijuana plant.

27 ³ Pursuant to Health and Safety Code section 11362.765, qualified patients who have a medical
28 marijuana identification card are not subject to criminal liability under Health and Safety Code section 11357.

1 medical profession, or conduct which is unbecoming to a member in good standing of the medical
2 profession, and which demonstrates an unfitness to practice medicine, as more particularly
3 alleged in paragraphs 11(a) through (e), above, which are hereby incorporated by reference and
4 realleged as if fully set forth herein.

5 **PRAYER**

6 WHEREFORE, complainant requests that a hearing be held on the matters herein alleged,
7 and that following the hearing, the Medical Board of California issue a decision:

8 1. Revoking or suspending Physician's and Surgeon's Certificate No. A122057, issued
9 to respondent Gunjan Goel, M.D.;

10 2. Revoking, suspending or denying approval of respondent Gunjan Goel, M.D.'s
11 authority to supervise physician assistants, pursuant to section 3527 of the Code;

12 3. Ordering respondent Gunjan Goel, M.D., if placed on probation, to pay the Board the
13 costs of probation monitoring; and

14 4. Taking such other and further action as deemed necessary and proper.

15
16 DATED: August 26, 2015


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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Exhibit B

Notice of Defense and Special Notice of Defense

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

GUNJAN GOEL, M.D.

Respondent.

Case No. 800-2014-005548

NOTICE OF DEFENSE

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

Dated: September 9, 2015

Respondent's Name:

Gunjan Goel, M.D.

Respondent's Signature:

Gunjan Goel

Respondent's Mailing

Address:

200 W. Arbor Drive, # 8893

City, State and Zip Code:

San Diego, CA 92103

Respondent's Telephone:

(610) 691-3751

Respondent's Fax:

N/A

Respondent's E-mail

goelgunjan@gmail.com

Check appropriate box:



I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☒ I am represented by counsel, whose name, address and telephone number appear below:
- Counsel's Name Richard D. Barton, Esq. Procopio, Cory, Hargreaves +
Counsel's Mailing Address 12544 High Bluff Drive, Suite 300 *Savitch LLC*
City, State and Zip Code San Diego, CA 92130
Counsel's Telephone: (619) 515-3299
Counsel's Fax: (619) 235-0398
Counsel's E-mail: rick.barton@procopio.com
- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

SD2015801619
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1 Richard D. Barton (Bar No. 102613)
E-mail: rick.barton@procopio.com
2 Shelley A. Carder (Bar No. 137755)
E-mail: shelley.carder@procopio.com
3 Natalie V. Mueller (Bar No. 292714)
E-mail: natalie.mueller@procopio.com
4 PROCOPIO, CORY, HARGREAVES AND
SAVITCH LLP
5 12544 High Bluff Drive, Suite 300
San Diego, CA 92130
6 Telephone: 858.720.6300
Facsimile: 619.235.0398

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8 Attorneys for Respondent,
GUNJAN GOEL, M.D.

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BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 800-2014-005548

13 **Gunjan Goel, M.D.**
14 **200 W Arbor Dr. #8893**
15 **San Diego, CA 92103**

**SPECIAL NOTICE OF DEFENSE
AND REQUEST FOR HEARING**

15 **Physician's and Surgeon's Certificate No.**
16 **A122057,**

[GOV. CODE §§ 11505 AND 11506]

Respondent.

18 Respondent, GUNJAN GOEL, M.D. ("Respondent"), by and through her attorneys,
19 Procopio, Cory, Hargreaves & Savitch LLP, presents the following in defense to the charges
20 contained in the Accusation brought by Kimberly Kirchmeyer ("Complainant"). Furthermore,
21 Respondent hereby requests a hearing pursuant to Government Code § 11506(a)(1) and requests
22 that the hearing proceed with a stenographic reporter. Respondent does not consent to electronic
23 reporting of this matter.

24 **GENERAL DENIAL**

25 Respondent generally and specifically denies each and every allegation in Complainant's
26 Accusation, and the whole thereof, including each and every cause for discipline therein.

27 **AFFIRMATIVE DEFENSES**

28 As separate affirmative defenses to the Accusation, and to each and every cause for

1 discipline therein, Respondent alleges as follows:

2 **FIRST AFFIRMATIVE DEFENSE**

3 **(Failure to State a Cause of Action)**

4 Under Government Code §11506(a)(2), Respondent objects to the Accusation on the
5 ground that each and every cause for discipline does not state acts or omissions on which the
6 agency may proceed. The allegations as asserted fail to demonstrate a violation of any statute relied
7 upon therein or that the requirements of any alleged statutory violation have been met by
8 Respondent's conduct.

9 **SECOND AFFIRMATIVE DEFENSE**

10 **(Accusation Vague and Uncertain)**

11 Under Government Code §11506(a)(3), Respondent objects to the Accusation in that it is
12 so indefinite and uncertain that Respondent cannot prepare her defense.

13 **THIRD AFFIRMATIVE DEFENSE**

14 **(Failure to Assert a Causal Nexus)**

15 Respondent objects to the Accusation in that it fails to assert conduct which renders
16 Respondent unfit to practice her profession, in that no causal nexus exists between Respondent's
17 alleged conduct and the asserted causes of discipline.

18 **FOURTH AFFIRMATIVE DEFENSE**

19 **(Equal Protection)**

20 The Accusation, and each and every purported cause for discipline therein, denies
21 Respondent of her constitutional right to equal protection of the laws.

22 **FIFTH AFFIRMATIVE DEFENSE**

23 **(Due Process)**

24 The Accusation, and each and every purported cause for discipline therein, denies
25 Respondent of her constitutional right to due process of law.

26 ///

27 ///

SIXTH AFFIRMATIVE DEFENSE**(Compliance with Applicable Laws)**

The Accusation and each and every purported cause for discipline therein, are barred in whole or in part by reason of Respondent's compliance with all applicable laws, statutes, and regulations.

SEVENTH AFFIRMATIVE DEFENSE**(Absence of Harm or Injury)**

Respondent objects to the Accusation on the ground that each and every cause for discipline does not state acts or omissions in which the agency was harmed and/or injured.

EIGHTH AFFIRMATIVE DEFENSE**(Laches)**

The Accusation and each and every purported cause for discipline therein, are barred by the doctrine of laches.

NINTH AFFIRMATIVE DEFENSE**(Statute of Limitations)**

The Accusation and each and every purported cause for discipline therein, are barred, in part or in whole, by the statute of limitations.

TENTH AFFIRMATIVE DEFENSE**(Duress)**

The Accusation and each and every purported cause for discipline therein, are barred in whole or in part on the ground that Respondent was under duress when confronted by Complainant's representatives.

ELEVENTH AFFIRMATIVE DEFENSE**(Entrapment and/or Outrageous Enforcement Conduct)**

The conduct of Complainant's representatives rises to the level of gross misconduct which violates Respondent's Constitutional right to due process of law.

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TWELFTH AFFIRMATIVE DEFENSE**(Unclean Hands)**

The Accusation and each and every purported cause for discipline therein, are barred in whole or in part, by the doctrine of unclean hands.

THIRTEENTH AFFIRMATIVE DEFENSE**(Estoppel)**

The Accusation and each and every purported cause for discipline therein, are barred in whole or in part, by the doctrine of estoppel.

FOURTEENTH AFFIRMATIVE DEFENSE**(Mitigation)**

Respondent expressly reserves the right to introduce evidence of mitigating circumstances in her defense which may be appropriate upon further investigation in this matter.

FIFTEENTH AFFIRMATIVE DEFENSE**(Right to Plead Additional Defenses)**

Respondent expressly reserves the right to assert further defenses which may be appropriate upon further investigation in this matter.

DATED: September 9, 2015

PROCOPIO, CORY, HARGREAVES AND
SAVITCH LLP

By: 

Richard D. Barton, Esq.
Shelley A. Carder, Esq.
Natalie V. Mueller, Esq.
Attorneys for Respondent,
GUNJAN GOEL, M.D.