
COMPLAINT DOCUMENT

ROLAND PRINCE,
as Personal Representative of
the Estate of Alex Prince, Jr.
15906 Eloise Avenue
Rockville, MD 20853

Case No.: 57657563455

Plaintiffs,

v.

PAUL WESTON, PH.D.
1764 Tanglewood Drive
Bethesda, MD 20817

Defendant

COMPLAINT

COMES NOW the Plaintiff, Roland Prince, as Personal Representative of the Estate of Alex Prince, Jr. and states for his cause of action against Defendant, Paul Weston, Ph.D., as follows:

PARTIES

1. Dr. Paul Weston, Ph.D. is a resident of Montgomery County, Maryland. He resides at 1764 Tanglewood Drive, Bethesda, MD 20817, where he also maintains his practice as a licensed psychologist.
2. Roland Prince is Personal Representative of the Estate of Alex Prince, Jr., and resides at 15906 Eloise Avenue Rockville, MD 20853.

FACTS

3. Among Dr. Weston's patients was Alex Prince, Jr. ("Mr. Prince"). Mr. Prince saw Dr. Weston weekly as a patient, for approximately two months, until his untimely death.
4. At the conclusion of that two month period, Mr. Prince, a fighter pilot, died in a plane crash when the fighter jet he was flying crashed on a training flight in Maryland.
5. Dr. Weston should have concluded, based on his extensive examination of Mr. Prince through their psychotherapy sessions, that Mr. Prince was as yet unable to return to his work as a fighter pilot, because he remained traumatized as the result of a failed mission.

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6. Dr. Weston's failure to make such a determination constituted malpractice, and directly resulted in Mr. Prince's untimely death.

COUNT I (MALPRACTICE)

7. Plaintiffs reallege and incorporate herein the allegations in paragraphs 1 through 6 as if fully set forth herein.

8. Dr. Weston's failure to properly diagnose Mr. Prince was contrary to the recognized standard of care in his field of expertise.

9. His breach of the standard of care directly resulted in Mr. Prince's untimely death.

WHEREFORE, the Plaintiff demands judgment against Defendant in the amount of twenty million dollars.

COUNT II (WRONGFUL DEATH)

10. Plaintiffs reallege and incorporate herein the allegations in paragraphs 1 through 9 as if fully set forth herein.

11. Dr. Weston's failure to properly diagnose Mr. Prince was contrary to the recognized standard of care in his field of expertise.

12. His breach of the standard of care directly resulted in Mr. Prince's untimely death.

WHEREFORE, the Plaintiff demands judgment against Defendant in the amount of twenty million dollars.

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JURY TRIAL DEMAND

Plaintiffs, pursuant to Maryland Rule 2-325 (a), hereby demand that this action be tried by jury.

Respectfully submitted,

Edward B. Schwartz
Law Offices of Woodward Bishop & Jacobs
56902 Baltimore Ave.
Baltimore, Maryland 21209

Attorney for Roland. Prince

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January 6, 2009

Via Hand Delivery
Mr. Paul Weston, Ph.D.
308 Henry Street
Brooklyn, NY 11201

Re: Estate of Alex Prince, Jr. v. Paul Weston

Dear Mr. Weston:

Thank you for accepting service of process in the above-entitled action. Enclosed are the summons and complaint.

Please contact me should you have any questions. Thank you.

Truly Yours,

Edward B. Schwartz, Esq.

Enclosures