



*Wexford Health Sources, Inc.*, No. 14-3282, 2015 WL 1500339 (C.D. Ill. Mar. 27, 2015), concluding that when a nurse's conduct is at issue, a report from a physician licensed to practice medicine in all its branches suffices. *Id.* at \*3-4. The reports provided by plaintiff meet this and the other statutory requirements and also sufficiently describe familiarity with the standard of care. In this regard, the Court notes, as did Judge Myerscough, that the requirements of section 2-622 "are to be liberally construed and are not intended to create insurmountable pleading hurdles," and they do not rise to the level of substantive elements of a claim for healing art malpractice. *Id.* at \*4.

The Court reaches the same conclusion regarding the sufficiency of the report provided by plaintiff regarding the conduct of Dr. David, a physician employed by Wexford. The report adequately identifies the standard of care, what Dr. David allegedly did wrong, and what he should have done.

For these reasons, the Court denies the Wexford defendants' motion to dismiss [dkt. no. 229]. The case remains set for a status hearing today as previously ordered.

Date: August 24, 2017

  
MATTHEW F. KENNELLY  
United States District Judge