TAB 54

1

**. *...

May 01, 2015 1–4

| JAN | IE DOE vs. VALLEY HEALTH SYSTEM LL | | | 1- |
|--|---|----------------|---|--------|
| | Page 1 | 1 | | Page |
| 1 | DISTRICT COURT | 1 | APPEARANCES OF COUNSEL (Cont'd) | |
| 2 | CLARK COUNTY, NEVADA | 2 | | |
| 3 | JANE DOE, | | For Defendant Farmer: | |
| 4 | Plaintiff, | 3 | | |
| 5 | vs. | | CARROLL, KELLY, TROTTER, | |
| | CASE NO. 09-A-595780 | 4 | FRANZEN, MCKENNA & PEABODY | |
| 6 | VALLEY HEALTH SYSTEM LLC, | | CHELSEA R. HUETH, ESQ. | |
| | a Nevada limited | 5 | Suite 260 | |
| 7 | liability company, d/b/a | - | 8329 W. Sunset Road | |
| | CENTENNIAL HILLS HOSPITAL | | Las Vegas, Nevada 89113 | |
| 8 | MEDICAL CENTER; UNIVERSAL | 6 | _ | |
| | HEALTH SERVICES, INC., a | | 702.792.5755 | |
| 9 | Delaware corporation; | 7 | 702.796.5855 Fax | |
| | AMERICAN NURSING | | crhueth@cktfmlaw.com | |
| 10 | SERVICES, INC., a | 8 | | |
| | Louisiana corporation; | 9 | | |
| 11 | STEVEN DALE FARMER, an | 10 | | |
| | individual; DOES I | 11 | | |
| 12 | through X, inclusive; and | 12 | | |
| | ROE CORPORATIONS I | 13 | | |
| 13 | through X, inclusive, Defendants. | 14 | | |
| 14 | Derendants. | 15 | | |
| | | 16 | | |
| 15 16 | DEPOSITION OF | 17 | | |
| 17 | RENATO SUMERA, RN | 18 | • | |
| 18 | KIIMIO DOMINI, IN | | | |
| 19 | Friday, May 1, 2015 | 19 | | |
| 20 | 9:30 a.m. | 20 | | |
| 21 | | 21 | | |
| 22 | 521 S. Third Street | 22 | | |
| 23 | Las Vegas, Nevada | 23 | | |
| 24 | | 24 | | |
| 25 | Carol O'Malley, CCR 178, RMR | 25 | | |
| | Page 2 | | | Page |
| 1 | APPEARANCES OF COUNSEL | 1 | INDEX OF EXAMINATION | i ugo |
| 2 | For Plaintiff: | 2 | | |
| 3 | MURDOCK & ASSOCIATES, CHTD. | 1 | | |
| 4 | ROBERT E. MURDOCK, ESQ. 520 S. Fourth Street | 3 | WITNESS: Renato Sumera | |
| 4 | Second Floor | 4 | | |
| 5 | Las Vegas, Nevada 89101 | 5 | | |
| | 702.384.5563 | | | |
| 6 | 702.384.4570 Fax lasvegasjustice@aol.com | 6 | | |
| 7 | Idbregabjabaloodaalioom | 7 | EXAMINATION | PAG |
| 8 | | 8 | | |
| • | For Defendant Valley Health System LLC, d/b/a Centennial Hills Hospital Medical Center: | 9 | By Mr. Murdock | 5, 12 |
| 9 10 | HALL PRANGLE & SCHOONVELD, LLC | | • | |
| | JOHN F. BEMIS, ESQ. | 10 | By Mr. Silvestri | 89, 14 |
| 11 | Suite 200 | 11 | | |
| 10 | 1160 N. Town Center Drive Las Vegas, Nevada 89144 | 12 | | |
| 12 | 702.889.6400 | | | |
| 13 | 702.384.6025 Fax | 13 | | |
| | jbemis@hpslaw.com | 14 | INDEX TO EXHIBITS | |
| 14 15 | | 15 | | |
| | For Defendant American Nursing Services, Inc.: | | EXHIBITS | MARKE |
| 16 | | | | |
| 17 | LEWIS BRISBOIS BISGAARD & SMITH LLP AMANDA J. BROOKHYSER, ESQ. | 16 | | |
| 17 | 6385 S. Rainbow Boulevard | 17 | 1 Voluntary Statement of Margaret Wolfe | 75 |
| | Suite 600 | 18 | 2 Caliper Measurements | 151 |
| τ0 | Las Vegas, Nevada 89118 | | - | 151 |
| | | 19 | 3 Centennial Hills Hospital ECG Report | |
| | 702.693.4320 | | | |
| 19 | 702.693.4320 702.893.3383 702.893.3789 Fax | 20 | 4 Centennial Hills Hospital ECG Report | 152 |
| 19 20 | 702.693.4320 702.893.3383 | 20 | 4 Centennial Hills Hospital ECG Report | 152 |
| 19 20 21 | 702.693.4320 702.893.3383 702.893.3789 Fax amanda.brookhyser@lewisbrisbois.com | 21 | 4 Centennial Hills Hospital ECG Report | 152 |
| 19 20 21 | 702.693.4320 702.893.3383 702.893.3789 Fax amanda.brookhyser@lewisbrisbois.com PYATT & SILVESTRI | 21 22 | 4 Centennial Hills Hospital ECG Report | 152 |
| 19 20 21 22 | 702.693.4320 702.893.3383 702.893.3789 Fax amanda.brookhyser@lewisbrisbois.com PYATT & SILVESTRI JAMES P.C. SILVESTRI, ESQ. 701 Bridger Avenue | 21 | 4 Centennial Hills Hospital ECG Report | 152 |
| 19 20 21 22 23 | 702.693.4320 702.893.3383 702.893.3789 Fax amanda.brookhyser@lewisbrisbois.com PYATT & SILVESTRI JAMES P.C. SILVESTRI, ESQ. 701 Bridger Avenue Las Vegas, Nevada 89101 | 21 22 | 4 Centennial Hills Hospital ECG Report | 152 |
| 18 19 20 21 22 23 24 | 702.693.4320 702.893.3383 702.893.3789 Fax amanda.brookhyser@lewisbrisbois.com PYATT & SILVESTRI JAMES P.C. SILVESTRI, ESQ. 701 Bridger Avenue | 21 22 23 | 4 Centennial Hills Hospital ECG Report | 152 |





25

÷.,

| JAI | NE DUE VS. VALLET HEALTH STSTEIVILL | | | |
|-----|---|-----|----------|--|
| 1 | Page 5 Deposition of Renata Sumera, RN | 1 | Δ | Page 7 2004 until 2008. |
| 2 | May 1, 2015 | 2 | | And where were you before Summerlin? |
| 3 | (Prior to the commencement of the deposition, | 3 | | Chicago, Illinois. |
| | all of the parties present agreed to waive | 4 | | Did you work there? |
| 4 | | 5 | Q. A. | |
| 5 | statements by the court reporter, pursuant to | 1 - | | |
| 6 | Rule 30(b)(4) of NRCP.) | 6 | | Where did you work? |
| 7 | | 7 | | A hospital called Palos Community Hospital. |
| 8 | RENATO SUMERA, RN, | 8 | | I'm sorry, could you spell that for me? |
| 9 | having been first duly sworn, testified as follows: | 9 | | Yeah. Palos is spelled P-a-i-o-s, and then |
| 10 | | 10 | | unity Hospital. |
| 11 | | 11 | | Where is Palos Community Hospital? |
| 12 | | 12 | | Palos Heights, Illinois. |
| 13 | | 13 | | What did you do there? |
| 14 | | 14 | | RN in the ER. |
| 15 | A. My full name is Renato Sumera. | 15 | | Who owns Palos Heights Community Hospital? |
| 16 | Q. Mr. Sumera, have you ever had your | 16 | | Then it was St. George. I don't know now. |
| 17 | deposition taken before? | 17 | Q. | How long did you work there? |
| 18 | A. No. | 18 | | I don't remember now. |
| 19 | Q. Are you represented at this deposition? | 19 | Q. | Approximately. |
| 20 | A. As far as the hospital lawyer, yes. | 20 | Α. | More than ten years. |
| 21 | Q. No, do you have a personal lawyer? | 21 | Q. | Okay. You're a nurse? |
| 22 | A. No, I don't. | 22 | Α. | Yes. |
| 23 | Q. So you do not have a lawyer here, is that | 23 | Q. | You're licensed in the State of Nevada? |
| 24 | correct? | 24 | Α. | Yes, I am. |
| 25 | A. Correct, sir. | 25 | Q. | How long have you been licensed in the |
| | Page 6 | | | Page 8 |
| 1 | MR. BEMIS: I object to form. | 1 | State o | f Nevada? |
| 2 | BY MR. MURDOCK: | 2 | | Since I moved, 2004. |
| 3 | Q. Thank you. | 3 | | Why did you move here? |
| 4 | A. Before we get started I need to know who | 4 | | Pretty much the weather. I got tired of |
| | you are. I missed the introduction. | 5 | the win | |
| 6 | Q. I didn't introduce myself. That's why. My | 6 | | I can't blame you. So you moved to Las |
| 7 | name is Rob Murdock. | 7 | Vegas. | - + |
| 8 | A. Mr. Murdock. | 8 | vegas. | When you moved to Las Vegas I |
| _ | Q. I represent the plaintiff in this matter. | 9 | accume | e you had to do something with your license, |
| 9 | • • | 10 | right? | s you had to do someaning wan your license, |
| 10 | I apologize. | | - | As far as getting a license here, correct. |
| 11 | A. Good morning. | 11 | | |
| 12 | Q. My understanding is that you are employed | 12 | | How did that work? |
| 13 | at Centennial Hills, is that correct? | 13 | | Application. |
| 14 | A. It still is, yes. | 14 | | To the State of Nevada? |
| 15 | Q. Okay. And how long have you been so | 15 | | To the State of Nevada, correct. |
| 16 | employed? | 16 | Q. | So you applied? |
| 17 | A. As far as at Centennial Hospital? | 17 | | Yes. |
| 18 | Q. Yes. | 18 | | Were there any issues with that? |
| 19 | A. January of 2008. Since we opened. | 19 | | No. |
| 20 | Q. And before then where did you work? | 20 | | And once you got your license first of |
| 21 | A. Summerlin Hospital, in the emergency room | 21 | | v long did that take, that process? |
| 22 | also. | 22 | Α. | Probably a few months. Maybe two months. |
| 23 | Q. What did you do at Summerlin? | 23 | Q. | Did you do that while you were in Chicago |
| 24 | A. RN, ER. | 24 | and | |
| | | | | |

25

A. In Illinois, yes. You apply for it, yeah.

800.211.DEPO (3376) EsquireSolutions.com

24 A. RN, ER. Q. How long were you at Summerlin? 25



May 01, 2015 5-8

57

:-: ۱

| IAN | NE DOE vs. VALLEY HEALTH SYSTEM LLC |) | 9–12 |
|--|--|----------------------------------|--|
| | Page 9 | | Page 11 |
| 1 | Q. No, no. Let me finish my question. | 1 | Q. What did that badge say? |
| 2 | Did you apply to Nevada while you | 2 | A. My first name, RN, and then I believe over |
| 3 | were in Illinois? | 3 | at Centennial we have an RN orange tag a big one. |
| 4 | A. Yes. | 4 | I'm not sure about Summerlin then. |
| 5 | Q. When you came to Las Vegas did you actually | 5 | Q. Okay. Well, at some point you moved from |
| 6 | have a job already? | 6 | Summerlin to Centennial, right? |
| 7 | A. Yes. | 7 | A. Correct. |
| 8 | Q. And that would be at Summerlin? | 8 | Q. And why did you do that? |
| 9 | A. Summerlin Hospital. | 9 | A. Closer to my house. |
| 10 | Q. Okay. When you applied at Summerlin | 10 | Q. Because your house is right next to |
| 11 | Hospital, how did you apply? | 11 | Centennial Hills Hospital, right? |
| 12 | A. I just walked into the human resource and | 12 | A. Yes. |
| 13 | asked for any openings in the ER. | 13 | Q. And by the way, what's your address? |
| 14 | Q. Now, you mentioned ER a couple of times, so | 14 | A. 9461 Canyon Hollow Avenue. |
| 15 | | 15 | Q. Are you married? |
| 10 | A. Yes, I am. | 16 | A. Yes, I am. |
| | | 17 | Q. What's your wife's name? |
| 17 | A. No. | 18 | A. First name is Loida, spelled L-o-i-d-a. |
| 18 | Q. You don't work med-surg or anything like | 19 | Q. What does she do for a living? |
| 19 | | 20 | A. She's also an RN. |
| | that? A. No. | 21 | Q. Where at? |
| 21 | | 22 | A. She's per diem at Centennial Hospital. |
| 22 | | 23 | Q. What does that mean, "per diem?" |
| 23 | A. ER, yes. | 24 | A. She's only required to work I believe two |
| 24 | Q. Now, your work at Summerlin Hospital | 25 | days a month. Two or three days a month. |
| 25 | _ | 20 | |
| | Page 10 | 1 | Q. How long has she worked there? |
| 1 | A. Yes. | 2 | A. She actually opened also in Centennial. |
| 2 | Q. Did you have to fill out an application? | 3 | Q. What does she do? |
| 3 | A. At any hospital you go to, yes, you have to | 4 | A. She's an RN. |
| 4 | fill out an application. | 5 | Q. Also in the ER? |
| 5 | Q. And did the application say who you were | | A. Staff, correct. |
| 6 | applying to work for? | 6 | |
| 7 | A. I'm pretty sure, yes. | 7 | |
| 8 | Q. Who did it say? | 8 | that? |
| 9 | A. Summerlin Hospital, and then the Valley | 9 | A. No. |
| 10 | Health System. | 10 | Q. Do you have any children? |
| 11 | | 11 | A. One. |
| 12 | | 12 | Q. How old is your child? |
| 13 | A. I don't remember that far. | 13 | A. 22. |
| | | 14 | Q. What does he do? |
| 14 | | 15 | A. Just graduated college. Q. Where from? |
| | or runs or manages or is something with Summerlin, | 1 | () Whore trendy |
| 15 | right? | 16 | |
| 15 16 | right? MR. BEMIS: 1 object to form. | 17 | A. University of Nevada Reno. |
| 15 16 17 | right? MR. BEMIS: 1 object to form. THE WITNESS: Yes. | 17 18 | A. University of Nevada Reno.Q. What's he going to do? |
| 15 16 17 18 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: | 17 18 19 | A. University of Nevada Reno.Q. What's he going to do?A. He wants to take medicine, so he's still |
| 15 16 17 18 19 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: Q. How do you know that? | 17 18 19 20 | A. University of Nevada Reno.Q. What's he going to do?A. He wants to take medicine, so he's still working on that. |
| 15 16 17 18 19 20 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: Q. How do you know that? | 17 18 19 20 21 | A. University of Nevada Reno. Q. What's he going to do? A. He wants to take medicine, so he's still working on that. Q. Has he ever worked at any hospitals? |
| 15 16 17 18 19 20 21 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: Q. How do you know that? A. In the website, every time I turn my computer on there is Universal Health System. | 17 18 19 20 | A. University of Nevada Reno. Q. What's he going to do? A. He wants to take medicine, so he's still working on that. Q. Has he ever worked at any hospitals? |
| 15 16 17 18 19 20 21 22 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: Q. How do you know that? A. In the website, every time I turn my computer on there is Universal Health System. | 17 18 19 20 21 | A. University of Nevada Reno. Q. What's he going to do? A. He wants to take medicine, so he's still working on that. Q. Has he ever worked at any hospitals? A. No. He's still kind of a student. |
| 15 16 17 18 19 20 21 | right? MR. BEMIS: I object to form. THE WITNESS: Yes. BY MR. MURDOCK: Q. How do you know that? A. In the website, every time I turn my computer on there is Universal Health System. Q. Now, at Summerlin Hospital you had a badge, | 17 18 19 20 21 22 | A. University of Nevada Reno. Q. What's he going to do? A. He wants to take medicine, so he's still working on that. Q. Has he ever worked at any hospitals? A. No. He's still kind of a student. Q. I'm sorry? |

ESQUIRE

. Sin de

| | | E vs. VALLEY HEALTH SYSTEM LL(| ر | 13–1 |
|---|--|--|--|--|
| | | Page 13 | | Page 1 |
| 1 | | wish he did, but no. | 1 | A. As far as I know, yes. |
| 2 | | You never tried to get him a job at | 2 | Q. Are they different colors for different |
| 3 | | nial or anything like that? | 3 | staff? |
| 4 | A. 1 | No. I told him just go full-time. Just | 4 | A. I've seen orange, and then I'm not sure |
| 5 | worry al | pout your studies. | 5 | about the other staff. I really don't notice other |
| 6 | Q. (| Okay. Now, you said that Centennial had a | 6 | staff, as far as what department they're from. |
| 7 | system | of badges, right? | 7 | Q. So for instance, CNAs, do they have |
| 8 | A. \ | /es. | 8 | something that says "CNA?" |
| 9 | Q. 1 | What was the color of the badges? | 9 | A. I don't know for sure. |
| 10 | Α. | It's white, with your picture on it. | 10 | Q. Okay. |
| 11 | Q. | Was it always that way? | 11 | A. But their white card will have a CNA. The |
| 12 | | As far as I remember, yes. | 12 | very front will have a CNA tag on there. Not a big |
| 13 | | I thought you said something about orange. | 13 | colorful thing. I'm not sure about the colorful |
| 14 | | That's just a second badge behind the | 14 | ÷ |
| 15 | | badge, and it has an orange at least mine | 15 | Q. Okay. I'm not sure I understand you. Wha |
| 16 | | ig orange "RN" on it, so everybody will know | 16 | |
| 17 | | an RN. It kinds of jumps out at you. | 17 | A. Okay. Myself, the front will have your |
| 18 | - | And that's the way it's always been there, | 18 | first name, and then your classification RN, CNA |
| 19 | right? | | 19 | radiology. |
| 20 | A. | Yes | 20 | Q. Oh, okay. So that's what you're talking |
| 21 | | So in other words, you would have a front | 21 | about? |
| 22 | | with your picture on it? | 22 | A. Yeah. |
| 23 | - | Correct. | 23 | Q. And then the colored one behind, you just |
| 24 | | And it's also got your first name, right? | | don't know what color it is? |
| 25 | A. 1 | | 25 | A. Yeah, I just don't notice, as far as other |
| 20 | А. | | 20 | • |
| 1 | 0 | Page 14 Does it have your last name? | 1 | Page 10 Page 10 |
| 2 | | This one, we don't. | 2 | Q. But certainly they'll say "CNA," right? |
| 3 | | What about back in 2008? | 3 | |
| 0 | | | | MR. BEMIS: Lobiect to form. |
| Λ | | believe not I don't remember really | | MR. BEMIS: I object to form. BY MR. MURDOCK: |
| 4 5 | A. I | believe not. I don't remember really. | 4 | BY MR. MURDOCK: |
| 5 | A. I Q. I | Do you have it with you? | 4 5 | BY MR. MURDOCK: Q. You can answer. |
| 5 6 | A. I Q. I A. N | Do you have it with you? No, I didn't bring it. | 4 5 6 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. |
| 5 6 7 | A. I Q. I A. M Q. V | Do you have it with you? No, I didn't bring it. What does it say on it? | 4 5 6 7 | BY MR. MURDOCK:Q. You can answer.A. I don't remember. I don't really notice.Q. Okay. So in other words, since you've been |
| 5 6 7 8 | A. I Q. I A. N Q. \ A. " | Do you have it with you? Io, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. | 4 5 6 7 8 | BY MR. MURDOCK:Q. You can answer.A. I don't remember. I don't really notice.Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what |
| 5 6 7 8 9 | A. I Q. I A. N Q. V A. " Q. (| Do you have it with you? Io, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. | 4 5 7 8 9 | BY MR. MURDOCK:Q. You can answer.A. I don't remember. I don't really notice.Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? |
| 5 6 7 8 9 | A. I Q. I A. N Q. V A. " Q. 0 A. " | Do you have it with you? Io, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. | 4 5 7 8 9 10 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at |
| 5 6 7 8 9 10 | A. I Q. I A. N Q. V A. " Q. O A. sign. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN | 4 5 7 8 9 10 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. |
| 5 6 7 9 10 11 | A. I Q. I A. N Q. V A. " Q. O sign. Q. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge | 4 5 7 8 9 10 11 12 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven |
| 5 6 7 9 10 11 12 | A. I Q. I A. N Q. V A. " Q. 0 A. sign. Q. someho | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? | 4 5 7 8 9 10 11 12 13 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you |
| 5 6 7 8 9 10 11 12 13 14 | A. I Q. 1 A. N Q. V A. " Q. 0 A. sign. Someho A. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. | 4 5 7 8 9 10 11 12 13 14 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge |
| 5 6 7 8 9 10 11 12 13 14 15 | A. I Q. 1 A. N Q. V A. " Q. 0 A. sign. Someho A. Q. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said | 4 5 7 8 9 10 11 12 13 14 15 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just |
| 5 6 7 8 9 10 11 12 13 14 15 16 | A. I Q. 1 A. N Q. V A. " Q. 0 A. 3 sign. Q. someho A. 1 Q. "Center | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said unial Hills Hospital?" | 4 5 7 8 9 10 11 12 13 14 15 16 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. |
| 5 6 7 8 9 10 11 12 13 14 15 16 17 | A. I Q. I A. N Q. V A. " Q. 0 A. 3 sign. Q. someho A. Q. "Center A. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said unial Hills Hospital?" Yes. | 4 5 7 8 9 10 11 12 13 14 15 16 17 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking |
| 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | A. I Q. I A. N Q. V A. " Q. 0 A. d sign. Q. someho A. Q. "Center A. Q. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said mial Hills Hospital?" Yes. And does it say Valley Health Systems? | 4 5 7 8 9 10 11 12 13 14 15 16 17 18 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. |
| 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | A. I Q. I A. N Q. V A. " Q. 0 A. 1 Someho A. 1 Q. "Center A. Q. Q. A. 1 | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said mial Hills Hospital?" Yes. And does it say Valley Health Systems? don't know for sure. | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, |
| 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | A. I Q. I A. N Q. V A. " Q. 0 A. Sign. Q. Someho A. 1 Q. "Center A. Q. Q. Center A. Q. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said anial Hills Hospital?" Yes. And does it say Valley Health Systems? I don't know for sure. Does it say "Universal Health Services," | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, because that can come off also. |
| 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 | A. I Q. I A. N Q. V A. " Q. 0 A. 3 sign. Q. someho A. 1 Q. "Center A. Q. Q. "UHS?" | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said anial Hills Hospital?" Yes. And does it say Valley Health Systems? I don't know for sure. Does it say "Universal Health Services," | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, because that can come off also. Q. Well, how do you know who's a CNA and |
| 5 6 7 8 9 10 11 12 13 14 15 16 7 18 9 20 12 22 12 1 | A. I Q. 1 A. N Q. V A. " Q. 0 A. 5 sign. Q. someho A. 1 Q. "Center A. Q. Q. "UHS?" A. | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said anial Hills Hospital?" Yes. And does it say Valley Health Systems? I don't know for sure. Does it say "Universal Health Services," | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, because that can come off also. Q. Well, how do you know who's a CNA and A. I just look at the name tag. |
| 5 6 7 8 9 10 11 2 13 14 15 16 17 18 9 22 1 22 23 | A. I Q. 1 A. N Q. V A. " Q. 0 A. Sign. Q. Someho A. 1 Q. "Center A. 1 Q. "Center A. 1 Q. Q. Someho A. 1 Q. Center A. 1 Q. Q. Someho Q. Someho Q. Q. Someho Someho Q. Someho Some | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said unial Hills Hospital?" Yes. And does it say Valley Health Systems? don't know for sure. Does it say "Universal Health Services," don't think so. The RN orange thing, does everybody who | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, because that can come off also. Q. Well, how do you know who's a CNA and A. I just look at the name tag. Q. So that's what you'd have to do? |
| 5 6 7 | A. I Q. I A. N Q. V A. " Q. 0 A. 1 Someho A. 1 Q. "Center A. 1 Q. "UHS?" A. 1 Q. Works t | Do you have it with you? No, I didn't bring it. What does it say on it? Renato, RN." "RN Class 3," I believe. Dkay. And then behind that there's the orange RN Now, is that actually attached to the badge ow, that orange RN thing? No. It's a separate card. Okay. Since 2008 has your badge said anial Hills Hospital?" Yes. And does it say Valley Health Systems? I don't know for sure. Does it say "Universal Health Services," | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 | BY MR. MURDOCK: Q. You can answer. A. I don't remember. I don't really notice. Q. Okay. So in other words, since you've been there since 2008, you haven't really noticed what CNAs wear? A. I will look at the tag. I always look at the name tag. Q. I understand that. So for the last seven years, since you've worked there for seven years, you can't tell me what a CNA badge A. I know what a CNA badge looks like. I just look at the white card the very front. Q. But that's the front card. I'm talking about the second card behind it. A. I don't really care about the second card, because that can come off also. Q. Well, how do you know who's a CNA and A. I just look at the name tag. |



·• .

- . }

1

| JA | NE DOE VS. VALLEY HEALTH SYSTEM LL | C | 17 | -2(|
|----------|---|----------|---|----------|
| | Page 17 | | Page | 19 |
| 1 | at least at some point in time there have been agency | | | |
| 2 | staff who have worked at the hospital? | 2 | A. Yes. | |
| 3 | A. Yes. | 3 | Q. Okay. So when you get this report, then | |
| 4 | Q. Do the agency badges tell me about | 4 | you'll know whether the person is an agency nurse or | ſ |
| 5 | those. How do you know who is an agency staff and | 5 | a CNA or not, is that correct? | |
| 6 | who isn't? | 6 | A. Correct. | |
| 7 | A. We will get a report that we're going to | 7 | Q. Do the patients get that report? | |
| 8 | get another person being pulled somewhere. | 8 | A. No. | |
| 9 | Q. That was a bad question of mine. | 9 | Q. So it's just staff members? | |
| 10 | | 10 | A. Staff members, yeah. | |
| 11 | | 11 | Q. Does all the staff get it, or just the | |
| 12 | • • | 12 | 5 | |
| 13 | • | 13 | A. Pretty much the first one would be the | |
| 14 | | 14 | 5 | |
| 15 | | 15 | Q. Does everybody else get it then? | |
| 16 | you will have the person's name, what they're there | 16 | A. They'll know once we're in the huddle. | |
| 17 | | 17 | They'll know who's going to be working that night. | |
| 18 | BY MR. MURDOCK: | 18 | They'll meet up, introduce themselves. | |
| 19 | Q. But will it say the agency name? What does | 19 | Q. Okay. When agency staff is there, does the | |
| 20 | it say? | 20 | agency manager come on shift to tell them what to do | о? |
| 21 | A. I'm not sure about the agency name. | 21 | A. I've never seen an agency manager. | |
| 22 | Q. Does it have their picture on it? | 22 | Q. Oh, okay. So you, as the charge nurse from | |
| 23 | A. Oh, God. I don't remember, as far as the | 23 | Centennial Hills Hospital you'll tell that person | |
| 24 | beginning. | 24 | what to do, right? | |
| 25 | Q. Well, in other words, if I'm working at the | 25 | A. Yes, the rules. | |
| | Page 18 | | Page 2 | 20 |
| 1 | hospital, how do I know you're an agency person or | 1 | Q. And you'll tell them, as a matter of fact, | 20 |
| 2 | just another employee? | 2 | to go into whatever, room 1 or room 2, right? | |
| 3 | A. I always ask them. | 3 | A. Yeah. Assignments, we call it. | |
| 4 | Q. So you have to ask? | 4 | Q. Right. You'll direct them to that, right? | |
| 5 | A. You have to ask. | 5 | A. Yeah. | |
| 6 | Q. So you couldn't do it just by looking at | 6 | Q. Not the agency itself, correct? | |
| 7 | their badge, right? | 7 | A. Correct. | |
| 8 | MR. BEMIS: I object to form. | 8 | Q. You'll tell them to go empty a bedpan, | |
| 9 | BY MR. MURDOCK: | 9 | correct? | |
| 10 | Q. Go ahead. You can answer. | 10 | MR. BEMIS: I object to form. Go | |
| 11 | A. I would look at the badge, and if I don't | 11 | ahead. | |
| 12 | know their face, I would ask them, "Where are you | 12 | THE WITNESS: I can't say that. | |
| 13 | coming from?" Which I always do. | 13 | Usually the nurse that needs help will ask. | |
| 14 | Q. Okay. And you said you get some documents | 14 | BY MR. MURDOCK: | |
| 15 | saying that some staff members are there, or | 15 | Q. Okay. What I'm getting at is, the agency | |
| 16 | something like that? | 16 | manager doesn't come in and tell them to go empl | tv |
| 17 | A. Yeah. If you're the charge nurse or the | 17 | bedpans, right? | -, |
| 18 | relief charge nurse, before the shift starts you will | 18 | A. No. | |
| 19 | know who's coming down to your department, as far as | 19 | Q. The agency manager doesn't come in to ge | 0 |
| 20 | someone being pulled. They'll let you know whether | 20 | tell them to change leads or help fix leads on the | <u> </u> |
| 21 | that's an agency nurse or agency CNA, yeah. | 21 | EKG, right? | |
| 22 | Q. And is that a document that you get? | 22 | A. No. | |
| 23 | A. It's a report that we get from the house | 23 | Q. The agency staff doesn't come in and tell | |
| 23 24 | supervisor. The staffing actually. | 23 24 | them to go clean up vomit that's on the floor, right? | 2 |
| 6-T | · · · · | | | • |
| 25 | Q. And is that the way it's always been at the | 25 | A. No. | |



 \mathbb{R}^{j}

۰. ۲۰

| Page 21 | | |
|--|--|--|
| | | Page 23 |
| Q. That would be the charge nurse, or whoever | 1 | nurse that night. |
| is directing that person from Centennial Hills | 2 | Q. Okay. If you witness a staff member doing |
| Hospital, right? | 3 | something to a patient that you believe is harmful to |
| A. Correct. | 4 | the patient, who does that get reported to? |
| Q. Okay. Now, do you know a nurse by the name | 5 | A. That would be reported to the house |
| of Christine Murray? | 6 | supervisor. |
| A. I don't recall that person's name. | 7 | Q. Who was the house supervisor back in 2008? |
| Q. Back in 2008 who was your director of | 8 | A. I just remember his first name. This is |
| nursing? | 9 | for the nightshift. It's Dodgey. I don't know his |
| A. Oh, God. I know her first name is Amy. | 10 | last name. |
| Bochenek I believe is the last name. You're testing | 11 | Q. Is the house supervisor a nurse? |
| • | 12 | A. Yes. |
| • • • | 13 | Q. Dodgey? |
| - | 1 | A. Yeah. |
| | 1 | Q. In your seven years of working at |
| - | 1 | Centennial Hills Hospital have you ever reported |
| · · · | | · · · |
| | | anything to the house supervisor? |
| | 1 | A. Well, the incidents where I got hurt by a |
| · · · · · · | 1 | patient. |
| • | | Q. Sure. But anything else? |
| • | | A. Let's see. I mean to me they're all minor |
| | | reports. |
| | | Q. Well, did you ever report another staff |
| Q. You can answer the question. | 1 | member? |
| A. Which nursing regulations? | 25 | A. No. |
| Page 22 | | Page 24 |
| Q. The Nevada Administrative Code. | 1 | Q. So all of your reports to the house |
| A. A long time ago. | 2 | supervisor would have been when patients did |
| Q. Okay. | 3 | something? |
| A. Yes. | 4 | A. Patient-related. |
| Q. Are you required to report certain things | 5 | Q. Have you ever reported a staff member, |
| | 6 | whether it's an agency staff or someone actually |
| | 7 | working for the hospital have you ever reported |
| - | | them to the State Board of Nursing? |
| - | | A. No. |
| | | Q. Have you ever seen a staff member do |
| | | something harmful to a patient? |
| - | | A. No. |
| | | Q. Have you ever seen a staff member do |
| • • • | | • |
| • | | something suspicious? |
| • • | | MR. BEMIS: I object to form. |
| patient or harm to the staff members. | | THE WITNESS: No. |
| Q. And does that mean, in other words, if you | 17 | BY MR. MURDOCK: |
| witness a staff member doing something to a patient, | 18 | Q. Nothing at all? |
| you should report it? | 19 | A. No. |
| | 20 | Q. You've never seen any staff member, agency |
| A. Absolutely. | | |
| A. Absolutely. Q. If you witness a patient doing something to | 21 | staff, or anybody at the hospital who works for |
| | 21 22 | staff, or anybody at the hospital who works for the hospital, or an agency staff, do anything |
| Q. If you witness a patient doing something to | | |
| Q. If you witness a patient doing something to a staff member, does that have to get reported? | 22 | the hospital, or an agency staff, do anything |
| | of Christine Murray? A. I don't recall that person's name. Q. Back in 2008 who was your director of nursing? A. Oh, God. I know her first name is Amy. Bochenek I believe is the last name. You're testing my memory again. Q. That's what this is all about. So Amy Bochenek? A. Bochenek, but we pronounce it Bohenek. Q. And what about a Ms. Wescott? Do you know a Ms. Wescott? A. I don't recall that name. Q. Okay. Have you ever reviewed the nursing regulations at all? MR. BEMIS: I object to form. Which nursing regulations? BY MR. MURDOCK: Q. You can answer the question. A. Which nursing regulations? Page 22 Q. The Nevada Administrative Code. A. A long time ago. Q. Okay. A. Yes. Q. Are you required to report certain things you witness, to the Board? MR. BEMIS: Join. THE WITNESS: It depends on what I'm witnessing. BY MR. MURDOCK: Q. What do you believe you're required to report? A. Anything that would cause harm to the | of Christine Murray?6A. I don't recall that person's name.7Q. Back in 2008 who was your director of8nursing?9A. Oh, God. I know her first name is Amy.10Bochenek I believe is the last name. You're testing11my memory again.12Q. That's what this is all about. So Amy13Bochenek?14A. Bochenek, but we pronounce it Bohenek.15Q. And what about a Ms. Wescott? Do you know16a Ms. Wescott?17A. I don't recall that name.18Q. Okay. Have you ever reviewed the nursing19regulations at all?20MR. BEMIS: I object to form. Which21nursing regulations?22BY MR. MURDOCK:23Q. The Nevada Administrative Code.1A. Yes.2Q. Okay.3A. Yes.4Q. Are you required to report certain things5you witness, to the Board?6MR. BEMIS: Join.7Iegal conclusion.8MR. BEMIS: Join.7Iegal conclusion.8MR. MURDOCK:12Q. What do you believe you're required to13report?14A. Anything that would cause harm to the15 |



· 演記

. er .

| JA | NE DOE vs. VALLEY HEALTH SYSTEM LL | С | 25-28 |
|----|---|----------|--|
| | Page 25 | | Page 27 |
| 1 | "suspicious?" | 1 | priority is patient safety. |
| 2 | BY MR. MURDOCK: | 2 | Q. And when you say the room is run safely, |
| 3 | Q. Odd. | 3 | you mean the ER itself? |
| 4 | MR. BEMIS: I object to form. | 4 | A. Yes. |
| 5 | THE WITNESS: What's odd? | 5 | Q. Are there any differences in duties between |
| 6 | BY MR. MURDOCK: | 6 | a relief charge nurse and a charge nurse? |
| 7 | Q. Well, for instance, seeing a CNA in a | 7 | MR. BEMIS: I object to form. Go ahead |
| 8 | patient's room when they weren't called. Have you | 8 | and answer, if you know. |
| 9 | ever seen that? | 9 | THE WITNESS: The charges can do more, |
| 10 | A. Sometimes a CNA will stock the room. | 10 | as far as paychecks. I don't know payroll. There |
| 11 | MR. SILVESTRI: Will what? | 11 | are some things I cannot do. |
| 12 | THE WITNESS: Stock the room. | 12 | BY MR. MURDOCK: |
| 13 | MR. SILVESTRI: With what? | 13 | Q. Prior to coming to this deposition today, |
| 14 | THE WITNESS: With urinals, gauze | 14 | have you spoken to anybody about the deposition? |
| 15 | MR. SILVESTRI: Supplies? | 15 | A. Yesterday I was debriefed. |
| 16 | THE WITNESS: Supplies. Exactly. | 16 | Q. Who were you debriefed by? |
| 17 | BY MR. MURDOCK: | 17 | A. John. Just to make sure I come here on |
| 18 | Q. But that would be appropriate. | 18 | time, where is the place at. |
| 19 | A. Yeah. | 19 | MR. BEMIS: Don't talk about anything |
| 20 | Q. I'm talking where a patient is in a room | 20 | that we talked about. |
| 21 | and a CNA just walks in the room. Is that odd? | 21 | BY MR. MURDOCK: |
| 22 | MR. BEMIS: I object to form. | 22 | Q. Well, actually I want you to start talking |
| 23 | THE WITNESS: No. | 23 | about it, because he's not your lawyer. You've |
| 24 | BY MR. MURDOCK: | 24 | already said that. I'd like to know the exact |
| 25 | Q. Have you ever seen a CNA touch a woman in | 25 | conversation you had with Mr. Bemis. |
| | Page 26 | <u> </u> | Page 28 |
| 1 | an inappropriate or just odd way? | 1 | MR. BEMIS: I object to form and I |
| 2 | MR. BEMIS: I object to form. | | instruct him not to answer, because he is represented |
| 3 | THE WITNESS: No. | | by counsel. |
| 4 | BY MR. MURDOCK: | 4 | MR. MURDOCK: No, you've told him he's |
| 5 | Q. Since 2008 by the way, were you hired as | 5 | represented. He told us at the beginning of the |
| 6 | a charge nurse? | | deposition you're not his lawyer. |
| 7 | A. No. Staff nurse. | 7 | If you're not his lawyer, there is |
| 8 | Q. Staff nurse. Have you ever been a charge | | no privilege, and John, you know that. |
| | nurse? | 9 | MR. BEMIS: There is a privilege, |
| 10 | A. Not officially a charge nurse. Always a | | because he is being represented by counsel for |
| 11 | relief or staff. | 11 | |
| 12 | Q. You've never been a charge nurse? | 12 | MR. MURDOCK: No, you're telling him |
| 13 | A. No. I'm too old for that. I'm kidding. | | that he's represented. That's inappropriate. |
| 14 | Q. So you've never been a charge nurse? | 14 | BY MR. MURDOCK: |
| 15 | A. No, not in a charge nurse role. Just a | 15 | Q. Have you ever retained Mr. Bemis to |
| 16 | relief charge. | 16 | represent you? |
| 17 | Q. What is a relief charge? | 17 | A. As far as he's with the hospital? |
| 18 | A. If a charge nurse wants to take a day off, | 18 | Q. No, you personally. Have you ever retained |
| 19 | I will be a relief charge. They do need days off. | 19 | Mr. Bemis to represent you at all? |
| 20 | Q. Okay. So at times you would actually go in | 20 | A. No. |
| 21 | and be that charge nurse, right? | 21 | Q. I'm sorry? The answer was "no," correct? |
| 22 | A. A relief charge. | 22 | A. What do you mean by that? |
| 23 | Q. What are the duties of a charge nurse or | 23 | MR. BEMIS: Have you accepted my |
| 24 | relief charge nurse? | 24 | representation as counsel? |
| 25 | A. Make sure the room is run efficiently, and | 25 | |
| | · · · · · · · · · · · · · · · · · · · | | |



: /

| 1 | | | |
|---|---|--|--|
| 1 | Page 29 | 1 . | Page 3 |
| | BY MR. MURDOCK: | 1 | Q. Prior to yesterday had you ever heard Mr. |
| 2 | Q. Go ahead. Answer that question, please. | 2 | Bemis' name? |
| 3 | A. Yes. | 3 | A. A while back. I don't know exactly when. |
| 4 | Q. Okay. Good. So did Mr. Bemis ask you | 4 | Q. Would it have been right when this incident |
| 5 | whether or not you wanted to be represented? Please | 5 | occurred? |
| 6 | tell me, has Mr. Bemis ever asked you if you wanted | 6 | A. I think so, yes. |
| 7 | to be represented at this deposition? | 7 | Q. Okay. Can you tell me the circumstances |
| 8 | MR. BEMIS: I'm going to instruct him | 8 | under which you met Mr. Bemis? |
| 9 | not to answer. | 9 | A. The conversation I don't remember. |
| 10 | MR. MURDOCK: Why? That's not | 10 | Q. Hold on. I'm not asking about the |
| 11 | privileged. | 11 | conversation itself. I'm asking you, was it at the |
| 12 | MR. BEMIS: It's privileged | 12 | hospital? |
| 13 | communication. | 13 | A. At the hospital. |
| 14 | MR. MURDOCK: No, it's not. | 14 | Q. Was it in a room at the hospital? |
| 15 | MR. BEMIS: We can call the Discovery | 15 | A. Yes. In a room at the hospital, yes. |
| 16 | Commissioner if you want. | 16 | Q. And you said it would have been right |
| 17 | MR. MURDOCK: I'm not going to call the | 17 | around the time of the incident, is that correct? |
| 18 | Discovery Commissioner. I'm going to file a motion. | 18 | A. Possibly after the incident, yes. After |
| 19 | You're instructing him not to | 19 | the incident. |
| 20 | answer a question before you even represented him. | 20 | Q. And the incident we're talking about is |
| 21 | MR. BEMIS: No, I'm instructing him not | 21 | with Mr. Farmer, is that correct? |
| 22 | to talk about a communication I've had with him. | 22 | A. Yes. |
| 23 | MR. MURDOCK: Before you even | 23 | Q. And who was in the room with you beside: |
| 24 | represented him. | 24 | Mr. Bemis? |
| 25 | MR. BEMIS: No. | 25 | A. I don't remember. I really don't remember. |
| | Page 30 | | Page 32 |
| 1 | BY MR. MURDOCK: | 1 | Q. Was there anybody in there? |
| 2 | Q. Before Mr. Bemis allegedly represented you, | 2 | A. Two more people, but I don't remember who |
| 3 | how did you come to know Mr. Bemis? | 3 | they are. |
| 4 | A. In the past. | 4 | Q. Were they lawyers? |
| 5 | Q. Tell me about it. | 5 | A. I don't remember. |
| 6 | A. When this first occurred. | 6 | Q. Was it Ms. Bochenek? |
| 7 | Q. Tell me about it. | 7 | A. No, she wasn't there. |
| 8 | A. As far as exact date, I cannot tell you. | 8 | Q. How do you know that? |
| | | | |
| | Q. Okay, Tell me about the communications. | 9 | A. I would know her. I know what she looks |
| 9 | Q. Okay. Tell me about the communications, conversations, whatever. | 9 10 | A. I would know her. I know what she looks like. |
| 9 10 | conversations, whatever. | 10 | like. |
| 9 10 11 | conversations, whatever. A. I don't recall. | 10 11 | like. Q. So it's two people there who you just |
| 9 10 11 12 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? | 10 11 12 | like. |
| 9 10 11 12 13 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. | 10 11 12 13 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. |
| 9 10 11 12 13 14 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury | 10 11 12 13 14 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? |
| 9 10 11 12 13 14 15 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? | 10 11 12 13 14 15 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. |
| 9 10 11 12 13 14 15 16 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. | 10 11 12 13 14 15 16 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was |
| 9 10 11 12 13 14 15 16 17 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you | 10 11 12 13 14 15 16 17 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. |
| 9 10 11 12 13 14 15 16 17 18 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that | 10 11 12 13 14 15 16 17 18 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. |
| 9 10 11 12 13 14 15 16 17 18 19 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? | 10 11 12 13 14 15 16 17 18 19 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? |
| 9 10 11 12 13 14 15 16 17 18 19 20 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? A. Absolutely. | 10 11 12 13 14 15 16 17 18 19 20 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? A. Timewise I don't remember. |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? A. Absolutely. Q. Okay. Knowing that, when did you first | 10 11 12 13 14 15 16 17 18 19 20 21 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? A. Timewise I don't remember. Q. Can you estimate it for me? |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? A. Absolutely. Q. Okay. Knowing that, when did you first come into contact with Mr. Bemis? | 10 11 12 13 14 15 16 17 18 19 20 21 22 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? A. Timewise I don't remember. Q. Can you estimate it for me? A. Ten minutes. |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? A. Absolutely. Q. Okay. Knowing that, when did you first come into contact with Mr. Bemis? A. The one I remember for sure was yesterday. | 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? A. Timewise I don't remember. Q. Can you estimate it for me? A. Ten minutes. Q. Do you believe that the conversation took |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | conversations, whatever. A. I don't recall. Q. You understand that you're under oath, sir? A. I sure am. Q. Do you understand what the law of perjury is? A. Yes. Q. You understand that when you state you don't remember something, but you actually do, that that could be called perjury? A. Absolutely. Q. Okay. Knowing that, when did you first come into contact with Mr. Bemis? A. The one I remember for sure was yesterday. Q. Well, that was yesterday. | 10 11 12 13 14 15 16 17 18 19 20 21 22 | like. Q. So it's two people there who you just didn't know who they were? A. Yeah. Q. Is that a yes? A. That's a yes. Q. And tell me about the discussion that was had. A. I don't remember the conversation. Q. How long was the conversation? A. Timewise I don't remember. Q. Can you estimate it for me? A. Ten minutes. |



روبر بالج روبر مالی روبر

××.

| JANE DOE vs. VALLEY HEALTH SYSTEM LLC | ; 33–3 |
|--|--|
| Page 33 | Page 3 |
| 1 MR. BEMIS: I object to form. | 1 conversation? |
| 2 THE WITNESS: I don't remember the | 2 A. That's too long ago. |
| 3 time, as far as time span. | 3 Q. Did they ask you your name? |
| 4 BY MR. MURDOCK: | 4 MR. BEMIS: I object to form. I'm |
| 5 Q. Is it more likely than not that it occurred | 5 going to instruct him not to answer any communicatio |
| 6 within days after the arrest? | 6 he had after now. |
| 7 A. I don't know exactly, but maybe. | 7 MR. MURDOCK: You weren't his lawyer. |
| 8 Q. Well, was it more likely than not that | 8 MR. BEMIS: I'm going to object to form |
| 9 that's when it occurred? | 9 and instruct him not to answer. |
| 10 MR. BEMIS: I object to form. | 10 THE WITNESS: I don't remember the |
| 11 THE WITNESS: Yes, sir. | 11 conversation. |
| 12 BY MR. MURDOCK: | 12 MR. MURDOCK: John, you keep |
| | 13 instructing him not to answer. You weren't his |
| | 14 lawyer. |
| 14 the hospital? | 15 MR. BEMIS: I absolutely was. |
| 15 A. Oh, gosh. It might be one of the | 16 MR. MURDOCK: No, you were the |
| 16 conference rooms. | - |
| 17 Q. Were you seated? | 17 hospital's lawyer. |
| 18 A. Yes, I was. | 18 BY MR. MURDOCK: |
| 19 Q. And do you recall being shown any | 19 Q. Do you understand he's the hospital's |
| 20 documents? | 20 lawyer? Do you understand that? |
| 21 A. No. | 21 A. Yes. |
| 22 Q. Do you recall who spoke? | 22 Q. Do you understand that this man also helped |
| 23 A. John. John was there. | 23 Mr. Farmer? Do you understand that? |
| Q. Right, I know John was there, but you said | 24 MR. BEMIS: I object to form. |
| 25 there were two other people as well. | 25 |
| | Page 3 |
| Page 34 1 A. Yeah, but I don't know who they are. I | 1 BY MR. MURDOCK: |
| | 2 Q. Do you understand that? |
| | 3 A. He's the hospital lawyer. |
| a a a b b b a second ad | 4 Q. Do you understand he helped Mr. Farmer a |
| | 5 well? |
| 5 statement of you? | 6 MS. HUETH: 1 object to form. |
| 6 A. I don't think so. | |
| 7 Q. Was there a video camera there? | 7 Argumentative. Harassing. |
| A. I don't remember a video camera. | 8 THE WITNESS: What's your point? |
| 9 Q. Were people taking notes? | 9 BY MR. MURDOCK: |
| 10 A. I don't recall. | 10 Q. Well, my point is, are you going to listen |
| 11 Q. Can you describe the other people in the | 11 to him? Do you want him to represent you? |
| 12 room? | 12 MR. BEMIS: I object to form. |
| 13 A. No, I can't. | 13 MS. HUETH: Objection. Argumentative. |
| 14 Q. Were they men or women? | 14 BY MR. MURDOCK: |
| 15 A. I don't recall. I want to say one is a | 15 Q. Or do you want your own lawyer? |
| | 16 MR. BEMIS: I'm going to object to |
| 16 fomale | |
| | 17 form. He is represented by counsel. |
| 17 Q. How were they dressed? | 17 form. He is represented by counsel. 18 MR_MURDOCK: Do you know what |
| 17 Q. How were they dressed?18 A. I don't recall. | 18 MR. MURDOCK: Do you know what |
| 17 Q. How were they dressed?18 A. I don't recall.19 Q. Did they give you a card? | 18 MR. MURDOCK: Do you know what19 champerty is, John? |
| 17 Q. How were they dressed? 18 A. I don't recall. 19 Q. Did they give you a card? 20 A. No. | 18MR. MURDOCK: Do you know what19champerty is, John?20MR. BEMIS: I'm not here to answer |
| 17 Q. How were they dressed? 18 A. I don't recall. 19 Q. Did they give you a card? 20 A. No. | MR. MURDOCK: Do you know what champerty is, John? MR. BEMIS: I'm not here to answer questions, Rob. |
| 17 Q. How were they dressed? 18 A. I don't recall. 19 Q. Did they give you a card? 20 A. No. 21 Q. Did they have you sign anything? 22 A. No. | MR. MURDOCK: Do you know what champerty is, John? MR. BEMIS: I'm not here to answer questions, Rob. MR. MURDOCK: Yeah, I know that. |
| Q. How were they dressed? A. I don't recall. Q. Did they give you a card? A. No. Q. Did they have you sign anything? A. No. | 18 MR. MURDOCK: Do you know what 19 champerty is, John? 20 MR. BEMIS: I'm not here to answer 21 questions, Rob. 22 MR. MURDOCK: Yeah, I know that. 23 BY MR. MURDOCK: |
| Q. How were they dressed? A. I don't recall. Q. Did they give you a card? A. No. Q. Did they have you sign anything? A. No. | MR. MURDOCK: Do you know what champerty is, John? MR. BEMIS: I'm not here to answer questions, Rob. MR. MURDOCK: Yeah, I know that. |



م مردولية

| JAI | NE DOE vs. VALLEY HEALTH SYSTEM LLO | 5 | 3740 |
|----------|--|----------|---|
| <u> </u> | Page 37 | | Page 39 |
| 1 | Q. First you said to me you didn't remember | 1 | Q. Okay. Good. So you don't need John, |
| 2 | the conversation. Then your lawyer jumped in | 2 | right? |
| 3 | afterwards and said, "No, I don't want you to talk | 3 | MR. BEMIS: I'm going to object to |
| 4 | about it." | 4 | form. |
| 5 | So what's it going to be? Are you | 5 | THE WITNESS: I'd like John to be here. |
| 6 | going to tell me about the conversations, or are you | 6 | BY MR. MURDOCK: |
| 7 | going to listen to the hospital's lawyer? | 7 | Q. I understand. He is here. He's sitting |
| 8 | MR. BEMIS: I object to form. | 8 | next to you. He's not going anywhere. |
| 9 | Argumentative. | 9 | MR. SILVESTRI: I'm just going to |
| 10 | MS. HUETH: Objection. Argumentative. | 10 | object. |
| 11 | Harassing. Asked and answered. | 11 | You're asking this guy, who has no |
| 12 | BY MR. MURDOCK: | 12 | legal understanding if he needs a lawyer he's |
| 13 | Q. You can answer the question. | 13 | saying he doesn't know. I'm getting a little |
| 14 | A. Again, I do not remember the conversation. | 14 | concerned now about where we're going with this. I'm |
| 15 | I do not remember the other people in the room. | 15 | just going to put that on the record. |
| 16 | Q. I didn't ask you that, sir. | 16 | MR. MURDOCK: I understand. |
| 17 | A. Okay. | 17 | MR. BEMIS: I join in the objection. |
| 18 | Q. All I asked you was, are you going to | 18 | MR. SILVESTRI: And I understand the |
| 10 | listen to your lawyer, or are you going to tell me | 19 | disagreement you have with Mr. Bemis, but now the |
| | about the conversation? Whatever you remember. If | 20 | witness he doesn't understand if he's represented |
| 20 | you don't remember, you don't remember. | 21 | or not. And he's asking, "Do I need a lawyer?" And |
| 21 | A. You can ask me. | 22 | · · · · · · · · · · · · · · · · · · · |
| 22 | | 22 | THE WITNESS: I'm very uncomfortable. |
| 23 | Q. Okay. Thank you. | 23 | |
| 24 | MR. BEMIS: No, no, no. I'm going to | 24 25 | Q. Okay. Well, I don't know whether you need |
| 25 | instruct him not to answer. | 20 | |
| <u> </u> | Page 38 | | Page 40 |
| 1 | MR. MURDOCK: No, he's already said | 1 | a lawyer or not. That's none of my business. You |
| 2 | John, he doesn't have to listen to you. You're not | | certainly have a right to have your own personal |
| 3 | his lawyer. You're the hospital lawyer. It doesn't | 3 | lawyer here. That's up to you. |
| 4 | matter. He doesn't have to listen to you, so stop | 4 | If you'd like to get your own |
| 5 | telling him not to answer. | 5 | personal lawyer, I have no problem stopping this |
| 6 | MR. BEMIS: I understand your position. | 6 | deposition right now so you can go ahead and get your |
| 7 | MR. MURDOCK: You're coaching him not | 7 | own personal lawyer. I don't know whether you need |
| 8 | to answer the question. | 8 | one or not. I can't give you that opinion. |
| 9 | MR. BEMIS: As his attorney, yes. | 9 | I am the plaintiff's lawyer. Mr. |
| 10 | MR. MURDOCK: You're not his attorney. | | Bemis is the hospital's lawyer. So it's up to you |
| 11 | He already said that at the beginning of the | | what you want to do. |
| 12 | deposition. You didn't jump in then. | 12 | MR. BEMIS: Can I take a break real |
| 13 | MR. BEMIS: He's represented by | 13 | quick and speak to the witness? |
| 14 | counsel. He's already told you that he's accepted | 14 | MR. MURDOCK: I'm not taking a break. |
| 15 | the representation. | 15 | MR. BEMIS: There's not a question |
| 16 | MR. MURDOCK: No, he didn't actually. | 16 | pending. |
| 17 | BY MR. MURDOCK: | 17 | MR. MURDOCK: I'm not taking a break, |
| 18 | Q. Have you accepted Mr. Bemis' | 18 | so it's up to you what you want to do. |
| 19 | representation? | 19 | MS. HUETH: Let's take a break. |
| 20 | A. I want him to be here, yes. | 20 | THE WITNESS: I need to go to the |
| 20 | Q. I understand that. Do you want him to be | 21 | bathroom. |
| 21 | your lawyer? | 22 | MR. MURDOCK: If you're going to take a |
| | A. Do I need a lawyer? That's my question. | 23 | break, that's fine. But I will tell you something. |
| 23 | - | 24 | If you speak with anybody, I'm going to ask you about |
| 24 | | 25 | |
| 25 | A. TUUHUMINKTHEEU A lawyet. | | |
| | | | |



و پيوندې پيوندې

*`)

| | NE DOE vs. VALLEY HEALTH SYSTEM LL | <u> </u> | 41-4 |
|---|--|--|---|
| 4 | Page 41 | | Page 43 |
| 1 | So go ahead. Take your break. | 1 | 2 |
| 2 | (Recess.) | 2 | • |
| 3 | MR. MURDOCK: Okay. We can go back on. | 3 | · · · · · · · · · · · · · · · · · · · |
| 4 | BY MR. MURDOCK: | 4 | |
| 5 | Q. Sir, during your break did you have any | 5 | |
| 6 | conversations with anybody? | 6 | |
| 7 | A. I just told John I feel uncomfortable. | | 7 people want to meet you, so I went to that conference |
| 8 | Q. And what did John say to you? | 8 | |
| 9 | A. I'm doing okay. | 9 | |
| 10 | Q. Okay. You're doing great. | 10 | , |
| 11 | So getting back to where we were, | 11 | |
| 12 | tell me about the conference that was had at the | 12 | - |
| 13 | hospital that you believe was more likely than not | 13 | |
| 14 | just a few days after the arrest of Mr. Farmer, | 14 | 5 |
| 15 | between you, Mr. Bemis, and two other individuals. | 15 | • |
| 16 | MR. BEMIS: I'm going object that it | 16 | 5 |
| 17 | calls for attorney-client privilege and instruct him | 17 | |
| 18 | not to answer. | 18 | |
| 19 | BY MR. MURDOCK: | 19 | • • |
| 20 | Q. Are you going to follow Mr. Bemis' | 20 | |
| 21 | instruction? | 21 | |
| 22 | A. Yes, I am. | 22 | 0 |
| 23 | Q. Okay. Very good. And I represent to you | 23 | |
| 24 | that you may be coming back here, and I'm not paying | 24 | ÷. |
| 25 | for it. So that being said, we can go that route. | 25 | 5 A. During my usual shift, yes. |
| | Page 42 | | Page 44 |
| 1 | Now, sir, you said the meeting was | 1 | · · · · · · · · · · · · · · · · · · · |
| 2 | about ten minutes, is that correct? | 2 | • |
| 3 | A. I don't know exactly what time, but | | • |
| 4 | approximately ten minutes. | 4 | |
| 5 | Q. And were any documents shown to you at all? | 5 | |
| 6 | • | | |
| | A. I don't recall any documents. | 6 | A. I believe so. Again, I don't know what |
| 7 | A. I don't recall any documents.Q. Did you show any documents to them? | 6 7 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. |
| 8 | A. I don't recall any documents.Q. Did you show any documents to them?A. I did not show any documents to them. | 6 7 8 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. |
| 8 9 | A. I don't recall any documents.Q. Did you show any documents to them?A. I did not show any documents to them.Q. Were you asked anything about Mr. Farmer? | 6 7 8 9 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have |
| 8 9 10 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That | 6 7 8 9 10 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? |
| 8 9 10 11 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct | 6 7 8 9 10 11 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. |
| 8 9 10 11 12 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. | 6 7 8 9 10 11 12 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to |
| 8 9 10 11 12 13 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: | 6 7 8 9 10 11 12 13 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? |
| 8 9 10 11 12 13 14 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? | 6 7 9 10 11 12 13 14 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. |
| 8 9 10 11 12 13 14 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. | 6 7 9 10 11 12 13 14 15 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? |
| 8 9 10 11 12 13 14 15 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the | 6 7 8 9 10 11 12 13 14 15 16 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. |
| 8 9 10 11 12 13 14 15 16 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? | 6 7 9 10 11 12 13 14 15 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? |
| 8 9 10 11 12 13 14 15 16 17 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same | 6 7 8 9 10 11 12 13 14 15 16 17 18 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. |
| 8 9 10 11 12 13 14 15 16 17 18 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. |
| 8 9 10 11 12 13 14 15 16 17 18 19 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same | 6 7 8 9 10 11 12 13 14 15 16 17 18 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same objection and instruct him not to answer. | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. A. He's a good worker. |
| 8 9 10 11 12 13 14 15 16 17 18 20 21 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same objection and instruct him not to answer. BY MR. MURDOCK: | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. A. He's a good worker. Q. A good CNA, right? |
| 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same objection and instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. A. He's a good worker. Q. A good CNA, right? |
| 8 | A. I don't recall any documents. Q. Did you show any documents to them? A. I did not show any documents to them. Q. Were you asked anything about Mr. Farmer? MR. BEMIS: I'm going to object. That calls for attorney-client privilege and I instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? A. Yes, I am. Q. Did you ask why you were called into the meeting? MR. BEMIS: I'm going to make the same objection and instruct him not to answer. BY MR. MURDOCK: Q. Are you going to listen to Mr. Bemis? | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | A. I believe so. Again, I don't know what time, but it was when I was working, yes. Q. Okay. And since you work between 7:00 p.m. and 7:00 a.m., which is the nightshift, it would have been during that time, correct? A. Yes, sir. Q. And did you know about the meeting prior to coming on shift that night? A. No. Q. Do you know who Mr. Farmer was? A. Yes. Q. Or is. Do you know who Steven Farmer is? A. I've worked with him a few nights, yeah. Q. Tell me about Steven. A. He's a good worker. Q. A good CNA, right? A. Yeah. Q. Always follows instructions? |



ч 7.8. . . Л

| | NE DOE vs. VALLEY HEALTH SYSTEM LL | C | 45-4 |
|----------------------|--|----------|--|
| | Page 45 | 1 | Page 4 |
| 1 | is that correct? | 1 | scrubs. |
| 2 | MR. BEMIS: I object to form. | 2 | Q. Oh, okay. So you just wear the same scrubs |
| 3 | Misstates testimony. | 3 | throughout the entire day? |
| 4 | BY MR. MURDOCK: | 4 | A. Yeah. |
| 5 | Q. Go ahead. | 5 | Q. And then you bring them home and they get |
| 6 | A. What was the question again? | 6 | washed, right? |
| 7 | Q. Were those instructions always given by | 7 | A. Correct. |
| 8 | you? | 8 | Q. Or whatever you want to do with them, |
| 9 | A. He can be asked by different nurses. | 9 | right? |
| | | 10 | - |
| 10 | Q. It was a bad question on my part. | 1 | |
| 11 | Did you ever instruct Steven to do | 11 | - |
| 12 | • | 12 | |
| 13 | A. The main thing is to stock the rooms. | 13 | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| 14 | Q. He was good at that, right? | 14 | |
| 15 | A. Yeah. | 15 | MR. BEMIS: I object to form. |
| 16 | Q. You told him to stock the rooms, and he | 16 | BY MR. MURDOCK: |
| 17 | stocked the rooms, right? | 17 | Q. Well, let me explain to you. I've seen |
| 18 | A. Yeah. | 18 | scrubs with cartoon characters on them, some of the |
| 19 | Q. Is that a yes? | 19 | pediatric people might wear that kind of stuff. |
| 20 | A. Yes. | 20 | Did Steven wear that, or were they |
| 21 | Q. Did you ever tell him to anything with any | | just kind of one-colored? |
| 22 | | 22 | A. I don't remember what he was wearing. I'm |
| 23 | A. When I needed a patient transported to a | 23 | pretty sure it's nothing like cartoons on it. I |
| | • • | 24 | |
| 24 | room upstairs, I usually asked him also. | 24 | |
| 25 | Q. And he did that, right? | 20 | Q. Okay. And did you ever instruct Steven to |
| | Page 46 | | |
| 1 | A. Yes. | 1 | do anything at all with EKG leads? |
| 2 | Q. He didn't say, "Oh, I want the agency | 2 | A. Usually the nurse who has that patient will |
| | manager to be here and tell me what to do," right? | 3 | ask the CNA to help. |
| 4 | MR. BEMIS: I object to form. | 4 | Q. To help, or actually to do them? |
| 5 | THE WITNESS: No. | 5 | A. To help her. |
| 6 | BY MR. MURDOCK: | 6 | Q. Or him? |
| 7 | Q. So you told him what to do and he did it, | 7 | A. If he was instructed to do an EKG, he'll do |
| 8 | right? | 8 | it. |
| 9 | A. Yes. | 9 | Q. Okay. Had you ever instructed Steven to do |
| 10 | Q. Can you describe Steven Farmer? | 10 | an EKG? |
| 11 | A. He showed up to work and does his job. | 11 | A. I don't remember. I'm pretty sure I |
| 12 | Q. What did his badge look like? | 12 | |
| 13 | A. It's got a face on it, his first name, and | 13 | Q. Is that something that CNAs do always at |
| | "CNA," and I believe that there was an agency badge, | 14 | Centennial Hills? They do EKGs if they're instructed |
| 14 | | | • • |
| 15 | if I recall correctly. | 15 | to do so? |
| 16 | Q. Are those different colors? | 16 | MR. BEMIS: I object to form. Go |
| 17 | A. Still a white one. | 17 | ahead. |
| 18 | Q. Oh, okay. What would he wear to work? | 18 | MR. SILVESTRI: Objection. Lacks |
| 19 | A. What would he wear to work? Scrubs. I | 19 | foundation. |
| | don't remember what he was wearing. | 20 | THE WITNESS: As far as doing what |
| 20 | | 21 | again? |
| | Q. Okay. Well, at Centennial Hills when it | <u> </u> | |
| 21 | Q. Okay. Well, at Centennial Hills when it opened, did you all get scrubs that were given to you | 22 | BY MR. MURDOCK: |
| 20 21 22 23 | - | | BY MR. MURDOCK: Q. EKGs. |
| 21 22 | opened, did you all get scrubs that were given to you | 22 | |



1.84

12

| JAI | NE DUE VS. VALLEY HEALTH SYSTEM LL | ب | 49-5. |
|----------------------------|---|----------------------|--|
| | Page 49 | | Page 51 |
| 1 | Q. So why would you then instruct him to do an | 1 | understand what a heart monitor is. |
| 2 | EKG? | 2 | MR. MURDOCK: Oh, okay. |
| 3 | A. I didn't tell him to do an EKG. | 3 | MR. SILVESTRI: Can we distinguish that |
| 4 | Q. I thought you said you did. | { | from the 12-lead EKG? |
| 5 | A. You're talking about the heart monitors. | 5 | MR. MURDOCK: Okay. I thought we did, |
| 6 | Q. Oh, okay. So there is a difference between | 6 | but I'll go back. No problem. |
| 7 | the heart monitors and an EKG? | 7 | BY MR. MURDOCK: |
| 8 | A. A 12-lead EKG, yeah, and then there's the | 8 | Q. Go back for a second and help me out a |
| 9 | heart monitors. | 9 | little bit, because I don't understand something. |
| 10 | Q. Oh, okay. The heart monitors, are those | 10 | Could you explain the difference |
| 11 | put on by CNAs generally? | 11 | between what an EKG is and what the heart leads are? |
| 12 | A. They can help the nurse put a heart | 12 | A. There's a 12-lead EKG. That's a test that |
| 13 | monitor, if the patient needs the treatment. | 13 | we perform if a patient shows symptoms of any chest |
| 14 | Q. Well, of course. You're not going to put | 14 | pain anything cardiac related. Or sometimes just |
| 15 | them on a patient who doesn't need it, right? | 15 | a basic workup. |
| 16 | A. Exactly. | 16 | Sometimes ER doctors will order a |
| 17 | Q. Does the nurse have to be there while the | 17 | |
| 18 | CNA is doing something with those leads? | 18 | chest, and then they'll run the quick 12 EKG and |
| 19 | MR. BEMIS: I object to form. Go ahead | 19 | that's done on paper. |
| 20 | and answer. | 20 | Versus the heart monitor, the |
| | MR. SILVESTRI: Form. | 21 | patient will lay on the gurney, put a gown on, and we |
| 21 | | 22 | will put 3 leads. At least in the ER it's 3 leads |
| 22 | THE WITNESS: The nurse should be there | 22 | the chest, and the rib area here. And then the heart |
| 23 | to receive the patient in the room. | | |
| 24 | BY MR. MURDOCK: | 24 | |
| 25 | Q. But as the CNA is doing something with the | 25 | Q. Let me see if I understand something you |
| | Page 50 | 4 | Page 52 |
| 1 | heart leads, should the nurse stay in the room? | | just said. |
| 2 | A. No, not necessarily stay in the room. | 2 | So the heart leads, where do they |
| 3 | Q. So in other words, the CNA is allowed to do | 3 | go on a chest? And specifically, if you could |
| 4 | that, right? | 4 | describe for me with a woman where would the leads |
| 5 | A. Yes. | 5 | go on a woman? |
| 6 | Q. So that's one job that the CNA is allowed | 6 | MR. SILVESTRI: For the heart monitor? |
| 7 | to do at Centennial Hills Hospital. They're allowed | 7 | MR. MURDOCK: Yeah. |
| 8 | to put on the heart leads, is that correct? | 8 | MR. SILVESTRI: Thank you. |
| 9 | MR. SILVESTRI: Objection. It lacks | 9 | THE WITNESS: Over the right chest. |
| 10 | foundation. | 10 | BY MR. MURDOCK: |
| 11 | THE WITNESS: What was the question | 11 | Q. You're pointing to approximately |
| 12 | again? | 12 | A. The clavicle region. |
| 13 | BY MR. MURDOCK: | 13 | Q. The clavicle region. Okay. |
| 14 | Q. The CNAs at Centennial Hills Hospital are | 14 | A. Right clavicle, left clavicle, and then the |
| 15 | allowed to put on the heart leads, is that correct? | 15 | left lateral rib area right here. (Indicating.) |
| 16 | MR. SILVESTRI: Same objection. | 16 | Q. Now, if a woman has breast tissue, does the |
| 17 | THE WITNESS: In the ER, yes. | 17 | breast need to be moved in order to place that lead? |
| | BY MR. MURDOCK: | 18 | MR. BEMIS: I object to form. |
| 10 | | 19 | Incomplete hypothetical. |
| 18 19 | Q. Have you ever been told that's what they're | | |
| 19 | Q. Have you ever been told that's what they're allowed to do, or is that something they just do? | | MR. SILVESTRI: For the heart monitor? |
| 19 20 | allowed to do, or is that something they just do? | 20 | MR. SILVESTRI: For the heart monitor? MR. MURDOCK: Yeah. All these |
| 19 20 21 | allowed to do, or is that something they just do? A. We usually show that person how to do it, | 20 21 | MR. MURDOCK: Yeah. All these |
| 19 20 21 22 | allowed to do, or is that something they just do? A. We usually show that person how to do it, as far as putting heart monitors and putting a gown | 20 21 22 | MR. MURDOCK: Yeah. All these questions are for the heart monitor, Jim. |
| 19 20 21 22 23 | allowed to do, or is that something they just do? A. We usually show that person how to do it, as far as putting heart monitors and putting a gown on. | 20 21 22 23 | MR. MURDOCK: Yeah. All these questions are for the heart monitor, Jim. THE WITNESS: I go lateral. I go here. |
| 19 20 21 22 | allowed to do, or is that something they just do? A. We usually show that person how to do it, as far as putting heart monitors and putting a gown | 20 21 22 | MR. MURDOCK: Yeah. All these questions are for the heart monitor, Jim. |

ESQUIRE

م موجع نا بار المراجع موجع المراجع المراجع

-

₹% }

| JAI | NE DOE vs. VALLEY HEALTH SYSTEM LL(| ز | 53-51 |
|----------|--|----|---|
| | Page 53 | | Page 55 |
| 1 | BY MR. MURDOCK: | 1 | leads. |
| 2 | Q. Okay. Does the patient have to undo their | 2 | BY MR. MURDOCK: |
| 3 | gown in order to get that lead on? | 3 | Q. Was Margaret Wolfe fired? |
| 4 | MR. BEMIS: I object to form. | 4 | MR. BEMIS: I object to form. |
| 5 | BY MR. MURDOCK: | 5 | THE WITNESS: I don't know officially, |
| 6 | Q. Or do you do that lead with the gown | 6 | but she did leave the hospital. |
| 7 | closed? | 7 | BY MR. MURDOCK: |
| 8 | MR. BEMIS: Incomplete hypothetical. | 8 | Q. I understand that. Was she fired? |
| 9 | THE WITNESS: It can go either way. | 9 | A. I don't know officially. |
| 10 | BY MR. MURDOCK: | 10 | Q. I don't care about officially. Do you |
| 11 | Q. How would you put the lead on the rib area | 11 | believe she was fired? |
| | • | 12 | |
| 12 | with the gown closed? | | MR. BEMIS: I object to form. Asked |
| 13 | A. The opening on the gown is typically in the | 13 | and answered. |
| 14 | back, so we just pull the gown up and go underneath. | 14 | THE WITNESS: She left the hospital. |
| 15 | Q. So that would be one way to do it, right? | 15 | BY MR. MURDOCK: |
| 16 | A. Yeah. | 16 | Q. How did she leave the hospital? |
| 17 | Q. And are male CNAs do they put heart | 17 | A. People didn't know until she left. I'm |
| 18 | leads onto female patients at Centennial Hills | 18 | still wondering what's going on. |
| 19 | Hospital? | 19 | Q. You know who Margaret Wolfe is, right? |
| 20 | A. If they're instructed by the nurse. | 20 | A. Yes. |
| 21 | Q. Do leads need to be checked from time to | 21 | Q. Margaret Wolfe was a nurse at Centennial |
| 22 | time? | 22 | Hills Hospital, right? |
| 23 | A. That's ultimately the responsibility of the | 23 | A. Correct. |
| 24 | nurse, to make sure the lead placements are correct. | 24 | Q. You worked with her for a couple of years, |
| 25 | Q. But do they need to be checked from time to | 25 | is that correct? |
| | Page 54 | | Page 56 |
| 1 | time? | 1 | MR. BEMIS: I object to form. |
| 2 | A. Yes. | 2 | THE WITNESS: Yes. |
| 3 | Q. And CNAs are allowed to do that, right? | | BY MR. MURDOCK: |
| 4 | MR. BEMIS: I object to form. | 4 | Q. In your time working with Margaret Wolfe at |
| 5 | MR. SILVESTRI: Objection. Lacks | - | the hospital, did you know her to be a liar? |
| | foundation. | 6 | MR. BEMIS: I object to form. |
| | | | Argumentative. |
| 7 | MR. MURDOCK: Well, strike that. | 8 | THE WITNESS: I don't know how to |
| | BY MR. MURDOCK: | | |
| 9 | Q. CNAs do that at Centennial Hills Hospital, | | answer that. |
| 10 | correct? | 10 | BY MR. MURDOCK: |
| 11 | MR. SILVESTRI: Same objection. | 11 | Q. Well, did she ever lie to you? |
| 12 | THE WITNESS: As far as what? | 12 | A. How would I know if she's lying to me? |
| 13 | BY MR. MURDOCK: | 13 | Q. Did you ever catch her in a lie? |
| 14 | Q. Checking heart leads. | 14 | A. No. |
| 15 | A. Why would they be checking the heart leads? | 15 | Q. Did you ever believe her to make up |
| 16 | Q. I don't know. If the patient moves. I | 16 | stories? |
| 17 | | 17 | A. I don't know how to answer that. |
| 18 | A. I cannot answer that. I don't know. | 18 | Q. Well, it's answered "yes" or "no." |
| 19 | don't know the answer to that. | 19 | A. I don't think she would make up stories. |
| 20 | Q. So heart leads, at least in your view, | 20 | Q. Did you know her to be an honest |
| 21 | never need to be checked, is that right? | 21 | individual? |
| 22 | MR. BEMIS: I object to form. | 22 | MR. BEMIS: I object to form. |
| | Misstates testimony. | 23 | MR. MURDOCK: Strike that. |
| 23 | | | |
| 23 24 | THE WITNESS: Again, it's the nurse's | 24 | BY MR. MURDOCK: |
| 24 | - | | BY MR. MURDOCK: Q. Did you believe her to be an honest |

ESQUIRE

in the second

-

. بر مر

| | NE DOE vs. VALLEY HEALTH SYSTEM LL | | 57-6 |
|---|---|---|--|
| | Page 57 | | Page |
| 1 | individual? | 1 | A. I always look at the news every day |
| 2 | A. I just worked with her. | 2 | , , |
| 3 | Q. I understand. But in your working with | 3 | Q. And what did you hear about Mr. Farmer in |
| 4 | her, did she ever do anything that would lead you to | 4 | Yahoo news? |
| 5 | believe that she was not an honest individual? | 5 | A. There's problems with Farmer and the |
| 6 | A. No. | 6 | hospital and patients. |
| 7 | Q. You testified before that you didn't know | 7 | Q. So what you're telling me is you didn't |
| 8 | why Margaret left the hospital, right? | 8 | know that before the conference? |
| 9 | A. Yeah, not officially. Everything is | 9 | A. I didn't know that. |
| 10 | rumors. I don't like to listen to rumors. | 10 | Q. You didn't know that after the conference? |
| 11 | Q. Tell me about some of the rumors. | 11 | A. After the conference? |
| | | 12 | Q. Yeah. |
| 12 | |) · - | |
| 13 | Q. You don't recall any? | 13 | A. After the conference, yes, because I've |
| 14 | A. The rumors? There were rumors she got | 14 | |
| 15 | fired, but nobody will tell you. It's always very | 15 | Q. Well, wait a minute. You said you saw the |
| 16 | private. It's very personal, so I don't want to | | news let me restate the question. |
| 17 | Q. Well, what have you heard? | 17 | You saw the news after the |
| 18 | A. She's gone. She left. | 18 | conference, correct? |
| 19 | Q. I understand. Did you hear any rumors | 19 | A. Maybe before the conference. |
| 20 | about why? | 20 | Q. Okay. So if you saw the news before the |
| 21 | A. I didn't listen to rumors. | 21 | conference, you knew there was a problem with |
| 22 | Q. I understand you didn't listen, but did you | 22 | Mr. Farmer, right? |
| 23 | hear them? | 23 | A. Correct. |
| 24 | A. I didn't listen to them. | 24 | Q. And when you saw the news with Mr. Farme |
| 25 | Q. But did you hear them? | 25 | |
| | Page 58 | | Page 6 |
| 1 | A. No. | 1 | MR. BEMIS: I object to form. |
| 2 | Q. So you have no idea. You never heard any | 2 | THE WITNESS: Can you say what's the |
| 3 | scuttlebutt around the hospital about why she left at | 3 | question again? |
| 4 | all? | 4 | BY MR. MURDOCK: |
| 5 | A. No. | 5 | Q. When you saw the news about Mr. Farmer or |
| 6 | Q. Nothing at all? | | Yahoo, what did you do about it, if anything? |
| 7 | A. No. | 7 | A. First of all, I can't believe it. I was |
| | Q. It's just an absolute mystery, right? | | |
| 8 | | | surprised |
| | | | surprised. |
| 9 | A. Correct. | 9 | Q. Okay. And what did you hear on the news, |
| 9 10 | A. Correct.Q. Okay. Outside of speaking with Mr. Bemis | 9 10 | Q. Okay. And what did you hear on the news, or read, whatever it was? |
| 9 10 11 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, | 9 10 11 | Q. Okay. And what did you hear on the news, or read, whatever it was?A. Again, something happened with the patients |
| 9 0 1 2 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days | 9 10 11 12 | Q. Okay. And what did you hear on the news, or read, whatever it was?A. Again, something happened with the patients in the hospital with Farmer. |
| 9 10 11 12 13 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken | 9 10 11 12 13 | Q. Okay. And what did you hear on the news, or read, whatever it was?A. Again, something happened with the patients in the hospital with Farmer.Q. Something like what? |
| 9 10 11 12 13 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else | 9 10 11 12 13 14 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. |
| 9 10 11 12 13 14 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. | 9 10 11 12 13 14 15 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we |
| 9 10 11 12 13 14 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody | 9 10 11 12 13 14 15 16 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong |
| 9 10 11 12 13 14 15 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. | 9 10 11 12 13 14 15 16 17 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong lead? |
| 9 10 11 12 13 14 15 16 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody | 9 10 11 12 13 14 15 16 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong |
| 9 10 11 12 13 14 15 16 17 18 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? | 9 10 11 12 13 14 15 16 17 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong lead? |
| 9 10 11 12 13 14 15 16 17 18 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in | 9 10 11 12 13 14 15 16 17 18 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong lead? A. I believe it was still early on. Something |
| 9 10 11 12 13 14 15 16 17 18 19 20 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in May well, that was more likely than not around the | 9 10 11 12 13 14 15 16 17 18 19 20 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong lead? A. I believe it was still early on. Something inappropriate with patients. Q. Inappropriate sexually? |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in May well, that was more likely than not around the time of the arrest, can you tell me, when was the | 9 10 11 12 13 14 15 16 17 18 19 20 21 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wrong lead? A. I believe it was still early on. Something inappropriate with patients. Q. Inappropriate sexually? A. I'm not sure about the sexual part, but |
| 10 11 12 13 14 15 16 17 18 19 20 21 22 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in May well, that was more likely than not around the time of the arrest, can you tell me, when was the next time you heard anything at all about Mr. Farmer? | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wron lead? A. I believe it was still early on. Something inappropriate with patients. Q. Inappropriate sexually? A. I'm not sure about the sexual part, but it's inappropriate, yeah. |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in May well, that was more likely than not around the time of the arrest, can you tell me, when was the next time you heard anything at all about Mr. Farmer? A. In Yahoo news. | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wron lead? A. I believe it was still early on. Something inappropriate with patients. Q. Inappropriate sexually? A. I'm not sure about the sexual part, but it's inappropriate, yeah. Q. Okay. And you believe that was before the |
| | A. Correct. Q. Okay. Outside of speaking with Mr. Bemis and these two people at that conference that you had, that you believe was more likely than not a few days after the arrest of Mr. Farmer, had you ever spoken to anybody else A. No. Q. Hold on had you ever spoken to anybody else regarding this matter? A. No. Q. Outside of that one conference that was in May well, that was more likely than not around the time of the arrest, can you tell me, when was the next time you heard anything at all about Mr. Farmer? A. In Yahoo news. Q. Is that something you looked up or | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. Okay. And what did you hear on the news, or read, whatever it was? A. Again, something happened with the patients in the hospital with Farmer. Q. Something like what? A. Something not right. Q. Something not right sexually, or are we talking he gave the wrong medicine, he put the wron lead? A. I believe it was still early on. Something inappropriate with patients. Q. Inappropriate sexually? A. I'm not sure about the sexual part, but it's inappropriate, yeah. |



9

| JAr | NE DOE VS. VALLEY HEALTH SYSTEM LLC | , | +0.10 |
|-----|--|------------|--|
| | Page 61 Q. And after the conference did you come to | 1 | Page 63 Q. Okay. |
| 1 | know what the exact problem was with Mr. Farmer? | 2 | |
| 2 | MR. BEMIS: 1 object to form. I'm | 3 | |
| 3 | going to instruct him not to answer anything that he | 4 | |
| 4 | learned from discussion with counsel. | 5 | - |
| 5 | BY MR. MURDOCK: | 6 | |
| 6 | Q. After the conference were you aware that it | - | that? |
| 7 | | 8 | |
| 1 | was alleged that Mr. Farmer had sexually assaulted | 9 | |
| 9 | several women? | 10 | and the second sec |
| 10 | MR. BEMIS: Again, I'm going to | 11 | |
| 11 | instruct him not to answer anything that he learned | 12 | - |
| 12 | in the confidence of a conversation he held with this | 13 | |
| 13 | attorney. | 14 | |
| 14 | BY MR. MURDOCK: | | |
| 15 | Q. Outside of the conference itself. | 15 16 | · · · · · · · · · |
| 16 | A. What was the question again? | l | |
| 17 | Q. After the conference so in other words, | 17 | |
| 18 | let's talk about time. Let's set this up a little | 18 | - |
| 19 | bit. | 19 | |
| 20 | You've got, you believe and | 20 | 0 |
| 21 | tell me if I'm wrong, this is what I thought I heard | 21 | |
| 22 | you say before the conference you knew there was | 22 | |
| 23 | an issue with Mr. Farmer being inappropriate with | 23 | |
| 24 | patients, and you knew that from looking at Yahoo | 24 | |
| 25 | news. | 25 | 5 A. No, I don't. I don't recall. |
| | Page 62 | <u> </u> | Page 64 |
| 1 | A. In the news, Yahoo, yes. | 1 | |
| 2 | Q. That was before the conference? | 2 | |
| 3 | A. Yes. | 3 | |
| 4 | Q. Okay. | 4 | |
| 5 | A. I'm not a hundred percent, but yeah. | 5 | - |
| 6 | Q. Okay. And after you found out about this | 6 | |
| 7 | issue with Mr. Farmer from Yahoo news before the | 7 | |
| 8 | conference, did you talk to anybody about it? | 8 | • |
| 9 | A. No. Before the conference, no. | 9 | |
| 10 | Q. Did you talk to any of the staff at the ER | 10 | 0 conference and yesterday, had you ever discussed |
| 11 | about it? | 11 | |
| 12 | A. Again, rumors, but I don't listen to | 12 | |
| 13 | rumors. | 13 | |
| 14 | a state of the sta | 14 | |
| 15 | A. No. I don't recall. | 15 | |
| 16 | Q. So in other words, after you read this on | 16 | - |
| 17 | ومريم مثله فاسله السيبيان فالمناب | 17 | |
| 18 | anything at all with anybody? | 18 | |
| 19 | | 19 | 9 Centennial Hills? |
| 20 | | 20 | 0 A. What's the last name? |
| 21 | | 21 | |
| 22 | | 22 | |
| 23 | | 23 | |
| 24 | | 24 | 4 MR. MURDOCK: First. |
| 25 | | 25 | 5 THE WITNESS: You've got to give me |
| 20 | , ,, ,, ,,, ,,,,,,,,,,,,,,,,,,,,,,,,,, | | |



- **-**

433

1

100

| | NE DUE VS. VALLEY HEALTH SYSTEM LL | - | 65-68 |
|---|--|--|---|
| 4 | Page 65 | 1 . | Page 67 |
| 1 | what the last name is. | 1 | A. I don't know. |
| 2 | BY MR. MURDOCK: | 2 | Q. Did anybody tell you they did? |
| 3 | Q. Well, let's put it this way, because | 3 | A. I don't know. |
| 4 | actually that's a good question. Was there anybody | 4 | Q. From the time Ms. Wolfe left the employ of |
| 5 | by the last name of Kim? | 5 | Centennial Hills until now, have you ever spoken to |
| 6 | A. No. I do not recall. | 6 | her? |
| 7 | Q. Have you ever heard of Kim Moon? Did she | 7 | A. No. |
| 8 | work in the ER? | 8 | Q. How did you know to come here today? |
| 9 | A. No. I believe she might be a med-surg | 9 | A. I'm sorry? |
| 10 | nurse upstairs, I think. Yeah. | 10 | Q. How did you know to come here today? |
| 11 | Q. Has anybody ever told you what Ms. Wolfe | 11 | A. This piece of paper. |
| 12 | has stated in this matter? | 12 | Q. Who gave you that? |
| 13 | A. No. | 13 | A. Somebody named Amanda in the hospital. |
| 14 | Q. Do you know what Ms. Wolfe has stated? | 14 | Q. What's Amanda's last name? |
| 15 | A. No. | 15 | A. I don't know. Not that Amanda. |
| 16 | Q. Do you know what Ms. Wolfe told the police? | 16 | Q. Not that Amanda. |
| 17 | A. No. | 17 | MS. BROOKHYSER: Just for the record. |
| 18 | Q. Did you tell the police anything? | 18 | BY MR. MURDOCK: |
| 19 | A. I don't remember talking to the police. | 19 | Q. So you got a piece of paper? |
| 20 | Q. Did you ever speak with anybody from | 20 | A. Yeah. |
| 20 | American Nursing Services? | | |
| | A. No. | 21 | Q. When did you get that paper? |
| 22 | | 22 | A. Before the week of April 22nd. |
| 23 | Q. Did you ever speak with any lawyers from | 23 | Q. And before the week of April 22nd did you |
| 24 | American Nursing Services? | 24 | get any other papers about having your deposition |
| 25 | A. I don't think so, no. | 25 | taken? |
| | Page 66 | | Page 68 |
| 1 | Q. Did you ever speak with any lawyers | 1 | A. No. This is the only paper. |
| 2 | representing another plaintiff by the name of | 2 | Q. Did you receive any phone calls about |
| 3 | Ms. Cagnina? | | having your deposition taken? |
| 4 | A. No. I don't know Cagnina. | 4 | A. No, just this here – this one. |
| 5 | Q. Did you treat the patient who was allegedly | 5 | |
| 6 | | | Q. And yesterday you said you met with Mr. |
| 0 | sexually assaulted in the ER? | | |
| 7 | | | Q. And yesterday you said you met with Mr. |
| | sexually assaulted in the ER? | 6 | Q. And yesterday you said you met with Mr. Bemis, right? |
| 7 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were | 6 7 8 | Q. And yesterday you said you met with Mr.Bemis, right?A. John, yes. |
| 7 8 9 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? | 6 7 8 | Q. And yesterday you said you met with Mr.Bemis, right?A. John, yes.Q. And how did you know to go meet with Mr.Bemis yesterday? |
| 7 8 9 10 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. | 6 7 8 9 | Q. And yesterday you said you met with Mr.Bemis, right?A. John, yes.Q. And how did you know to go meet with Mr. |
| 7 8 9 10 11 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? | 6 7 8 9 10 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. |
| 7 8 9 10 11 12 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. | 6 7 8 9 10 11 12 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time |
| 7 8 9 10 11 12 13 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? | 6 7 8 9 10 11 12 13 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? |
| 7 9 10 11 12 13 14 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. | 6 7 8 9 10 11 12 13 14 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. |
| 7 9 10 11 12 13 14 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge | 6 7 9 10 11 12 13 14 15 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? |
| 7 8 9 10 11 12 13 14 15 16 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? | 6 7 8 9 10 11 12 13 14 15 16 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for |
| 7 8 9 10 11 12 13 14 15 16 17 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. | 6 7 8 9 10 11 12 13 14 15 16 17 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? |
| 7 8 9 10 11 12 13 14 15 16 17 18 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? | 6 7 8 9 10 11 12 13 14 15 16 17 18 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. Q. Did you ever make a complaint to the State | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to be meeting with Mr. Bemis? |
| 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. Q. Did you ever make a complaint to the State Board of Nursing about Ms. Wolfe? | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to be meeting with Mr. Bemis? A. I got a call in my department yesterday. |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. Q. Did you ever make a complaint to the State Board of Nursing about Ms. Wolfe? A. No. | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to be meeting with Mr. Bemis? A. I got a call in my department yesterday. Q. Okay. And who did you get the phone call |
| 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. Q. Did you ever make a complaint to the State Board of Nursing about Ms. Wolfe? | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to be meeting with Mr. Bemis? A. I got a call in my department yesterday. Q. Okay. And who did you get the phone call from? |
| 7 8 | sexually assaulted in the ER? A. No. Q. Did you ever treat any patients who were allegedly sexually assaulted in the ER? A. No. Q. Are you known as Ray? A. My nickname. Q. Is Ray on your badge, or is it Renato? A. Renato. Q. Renato. Okay. Was Ms. Wolfe a charge nurse? A. No. Staff. Q. Was she a charge relief? A. No. Staff RN only. Q. Did you ever make a complaint to the State Board of Nursing about Ms. Wolfe? A. No. | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. And yesterday you said you met with Mr. Bemis, right? A. John, yes. Q. And how did you know to go meet with Mr. Bemis yesterday? A. I just wanted to make sure that the time and date is correct. Q. I understand. How did you know who Mr. Bemis was? A. Again, from the last time previously. Q. Did you have his card? A. As far as card for Q. Yesterday you met with Mr. Bemis, right? A. Right. Q. And how did you know that you were going to be meeting with Mr. Bemis? A. I got a call in my department yesterday. Q. Okay. And who did you get the phone call |



تر مطلق ف

Y

| JA | NE DOE vs. VALLEY HEALTH SYSTEM LL | С | 69–72 |
|----|--|----|---|
| | Page 69 | | Page 71 |
| 1 | yesterday? | 1 | BY MR. MURDOCK: |
| 2 | A. Before the week of April 22nd. | 2 | Q. Had you ever spoken with any lawyers at all |
| 1. | Q. Okay. So yesterday was the first time you heard about going to meet with Mr. Bemis, is that | 3 | from the hospital? |
| 4 | correct? | 4 | MR. BEMIS: Same objection. THE WITNESS: No. |
| 6 | MR. BEMIS: I object to form. | 6 | BY MR. MURDOCK: |
| 7 | THE WITNESS: Yesterday, yeah. | 7 | Q. Have you ever spoken to anybody from risk |
| 8 | BY MR. MURDOCK: | 8 | management at the hospital regarding this matter? |
| 9 | Q. As far as this deposition? | 9 | A. As far as what time span again? |
| 10 | A. Yeah. | 10 | |
| 11 | Q. So you didn't know anything about meeting | 11 | you had, and yesterday. |
| 12 | with Mr. Bemis until yesterday, is that correct? | 12 | |
| 13 | A. Correct. | | the week before April 22nd. |
| 14 | Q. And you said Amanda told you you were going | | |
| 15 | to have a meeting with Mr. Bemis, is that correct? | 15 | - |
| 16 | A. Correct. | 16 | conference that you said occurred more likely than |
| 17 | Q. And who is this Amanda? | 17 | |
| 18 | A. Again, I believe she works in the risk | 18 | you received the documents from Amanda around April |
| 19 | management. | 19 | 22nd, or the week before April 22nd, had you ever |
| 20 | Q. And did she tell you to call Mr. Bemis? | 20 | spoken to anybody else |
| 21 | A. No. | 21 | A. No. |
| 22 | Q. What did she tell you? | 22 | Q. Hold on anybody else at all? Mr. |
| 23 | A. To meet him in the office. | 23 | Bemis, any lawyers, any risk management people |
| 24 | Q. What office? | 24 | anybody at all regarding Mr. Farmer? |
| 25 | A. Where Amanda is located. | 25 | A. No. |
| | Page 70 | | Page 72 |
| 1 | Q. In the risk management office? | 1 | Q. Okay. Are you on any medication? |
| 2 | A. I believe so, yeah. It just says "Office" on the door. | 2 | A. High blood pressure pills. |
| 3 | Q. But you believe that's the risk management | 4 | Q. Anything else besides that?A. Fish oil. |
| | office? | 5 | Q. Anything else besides that? |
| 6 | A. It's risk management. | 6 | A. Vitamin D. Why are you asking? |
| 7 | Q. And who was at that meeting? | 7 | Q. Let me ask it this way. I'm not trying to |
| 8 | A. John and I. | 8 | get personal. I don't really care about what you |
| 9 | Q. Nobody else? | 9 | take. All I want to make sure is that you're not |
| 10 | A. Nobody else. | 10 | taking any medication that may affect your memory. |
| 11 | Q. And you said that meeting lasted about how | 11 | A. No. |
| 12 | • • | 12 | Q. So you're not taking anything that may |
| 13 | A. Quick. Maybe five or ten minutes at the | 13 | affect your memory? |
| 14 | most. | 14 | A. No. Whatever is affecting me is old age. |
| 15 | Q. So in between the time of the first | 15 | Q. Well, we all have that issue. |
| 16 | conference that you said occurred more than likely | 16 | A. Right. |
| 17 | around the time of the arrest of Mr. Farmer, until | 17 | Q. I'm just talking, for instance, if you were |
| 18 | yesterday, had you ever spoken with Mr. Bemis again? | 18 | taking I don't know, Valium, that may affect your |
| 19 | A. No. | 19 | memory. |
| 20 | Q. Had you ever spoken to anybody from Mr. | 20 | A. No narcotics at all. |
| 21 | Bemis' law firm? | 21 | Q. Okay. If you regularly smoke marijuana, |
| 22 | MR. BEMIS: I object to form. Calls | 22 | does that affect your memory? |
| 23 | for speculation. | 23 | A. I don't smoke marijuana. |
| 24 | THE WITNESS: I don't think so. | 24 | Q. These are questions we've got to ask now. |
| 25 | | 25 | So there's no issues with your |
| L | | L | |



فالمترتبية

,

35. |

| JA | NE DOE vs. VALLEY HEALTH SYSTEM LL(| 2 | 73-7 |
|----------|---|----|---|
| <u> </u> | Page 73 | | Page 75 |
| 1 | memory, right? | 1 | Q. Do you recall telling Ms. Wolfe that you |
| 2 | A. No. | 2 | were concerned about Mr. Farmer because he was very |
| 3 | Q. Just age like everybody else, correct? | 3 | anxious to connect and disconnect them from heart |
| 4 | A. Yes, and I hope it's normal for me. | 4 | monitors, which would require him to reach into their |
| 5 | Q. But you can't remember when the meeting | 5 | clothing? |
| 6 | was, right? | 6 | A. I don't remember any conversation. |
| 7 | A. Which meeting? | 7 | Q. Okay. You're not saying it didn't happen, |
| 8 | Q. Well, strike that. We'll go back. | 8 | you're saying you just don't remember, right? |
| 9 | Do you recall having a | 9 | A. I don't remember. |
| 10 | conversation with Ms. Wolfe about Mr. Farmer? | 10 | Q. If Ms. Wolfe told the police that you said |
| 11 | A. The only thing I can remember, as far as | 11 | that, do you have any reason to disagree with what |
| 12 | whatever, when she told me and I believe I was the | 12 | Ms. Wolfe said? |
| 13 | relief charge nurse that night, because she came up | 13 | MR. BEMIS: I object to form. |
| 14 | to me to let Steve know that we don't needlessly need | 14 | - |
| 15 | to put heart monitors on all patients. She said for | | answer that. |
| 16 | me to let him know that. | 16 | |
| 17 | So I pulled him aside and I told | 17 | |
| | him, "Knock before you enter a room. You ask the | 18 | |
| 18 | | 19 | MR. MURDOCK: Let's mark this. |
| 19 | nurse who has that patient, 'Do you need a heart | 20 | (Plaintiff's Exhibit 1 marked.) |
| 20 | monitor or not?" | | • |
| 21 | As far as that conversation, I | 21 | |
| 22 | think that's what I told him, and that's what we | 22 | · • • • • |
| 23 | talked about with Margaret, as far as her wanting me | 23 | · • |
| 24 | | 24 | |
| 25 | Q. So she wanted you to tell Steve that every | 25 | A. No. |
| | Page 74 | | Page 76 |
| 1 | patient didn't need a heart monitor? | 1 | Q. Have you ever been told it existed before? |
| 2 | A. Correct. | 2 | A. No. |
| 3 | Q. Did she tell you anything else? | 3 | Q. Do you see on the top it says, "Name of |
| 4 | A. No. | 4 | Person Giving Statement?" |
| 5 | Q. No, or you just don't remember? | 5 | A. Yes. |
| 6 | A. I don't remember, as far as the exact | 6 | Q. Who is that? |
| 7 | conversation. | 7 | A. Margaret Wolfe. |
| 8 | Q. Do you remember telling Ms. Wolfe to watch | 8 | Q. And as you go down to the first line |
| 9 | Steven around female patients? | 9 | well, in the first paragraph after the "Q." you'll |
| 10 | MR. BEMIS: I object to form. | 10 | |
| 11 | THE WITNESS: I don't recall that, no. | 11 | the 30th of May, 2008." Do you see that? |
| | | 12 | |
| 12 | Q. Do you remember telling Ms. Wolfe that you | 13 | Q. Now, if you go to page 2, do you see where |
| 13 | | | |
| 14 | | 14 | |
| 15 | overly attentive with female patients? | 15 | • |
| 16 | MR. BEMIS: I object to form. | 16 | Centennial Hills Hospital?" Do you see that? |
| 17 | THE WITNESS: I don't recall that | 17 | A. Yes. |
| 18 | | 18 | Q. Ms. Wolfe said, "I'm an ER nurse." Do you |
| 19 | BY MR. MURDOCK: | 19 | see that? |
| 20 | | 20 | A. Yes. |
| 21 | | 21 | Q. Is that true? |
| 22 | with female patients and very anxious to connect them | 22 | A. Margaret Wolfe is an ER nurse. |
| 23 | to the monitors and disconnect them from the | 23 | Q. And at least at the time she was an ER |
| 24 | | 24 | nurse at Centennial Hills Hospital, correct? |
| 25 | | 25 | |
| | | | · · · · · · · · · · · · · · · · · · · |

ESQUIRE

| JAI | NE DOE vs. VALLEY HEALTH SYSTEM LL(| 0 | 7780 |
|----------|--|----------|--|
| | Page 77 | | Page 79 |
| 1 | Q. So that was true, right? | 1 | Q. If she states she told you about what |
| 2 | A. Yes. | 2 | Mr. Farmer did, would you have any reason to |
| 3 | Q. Let's go down, and if you go down sort of | 3 | disbelieve it? |
| 4 | towards the bottom it says, "Q. Okay. And what was | 4 | MR. BEMIS: I object to form. |
| 5 | Steven Farmer's job?" Do you see that? | 5 | THE WITNESS: I just need to listen to |
| 6 | A. Yes. | 6 | what she's saying. I mean as far as believing or |
| 7 | Q. And her answer was, "He was a CNA. | 7 | not, it depends on |
| 8 | Contracted out through an agency." Do you see that? | 8 | BY MR. MURDOCK: |
| 9 | A. Yes. | 9 | Q. Would you have any reason to disagree with |
| 10 | Q. Was that true? | 10 | the fact that she told you about this, or do you just |
| 11 | A. Yes. | 11 | not remember? |
| 12 | Q. And still on page 2 at the bottom, the | 12 | A. Told me what? As far as |
| 13 | question was asked, "And what would you say his job | 13 | Q. What I just said, what Mr. Farmer was doing |
| 14 | duties were?" | | • |
| 15 | And if you turn to the next page | 15 | A. I don't remember. |
| 16 | she states, "Um, he was to assist the nurses with | 16 | Q. Okay. And then she tells the police, "And |
| 17 | patient care, taking them to the bathroom, possibly | 17 | I asked him" meaning you "if you would talk to |
| 18 | changing their clothing, cleaning any messes that | 18 | him about it, which he told me he did." And you did, |
| 19 | patient, you know, may have. Just general assistance | | • |
| 20 | in patient care. Transporting patients to and from | 20 | A. I talked to Steve Farmer, yes. |
| 21 | different units." Isn't that true? | 21 | Q. And you told Margaret that you had talked |
| 22 | A. Yes. | | to him, right? |
| 23 | Q. So she answered that truthfully? | 23 | A. For a follow-up, I probably did tell |
| 24 | A. Yeah. | 24 | Margaret that I talked to him. |
| 25 | Q. Where is the nurses' station in the ER at | 25 | Q. You just don't have any memory of it? |
| | Page 78 | | Page 80 |
| 1 | Centennial Hills? In other words, is it in the | 1 | A. I don't have any memory. |
| 2 | middle? | 2 | Q. But you have no reason to disagree with |
| 3 | A. I call it the middle, yes. | 3 | what she says here, is that correct? |
| 4 | Q. And all the rooms would be around it, is | 4 | A. Correct. |
| 5 | that correct? | 5 | MR. BEMIS: I object to form. |
| 6 | A. Yeah, it surrounds the nursing station. | 6 | BY MR. MURDOCK: |
| 7 | Q. Do you recall Ms. Wolfe telling you about | 7 | Q. You just can't remember? |
| 8 | an incident where Mr. Farmer had exposed a female | 8 | A. I can't remember. |
| 9 | patient's breasts where he was allegedly checking | 9 | Q. And then she states, "Okay. Did Ray say |
| 10 | monitor placements? | 10 | did Mr. Sumera say anything about what Mr. Farmer's |
| 11 | A. I don't recall any conversation like that. | 11 | response was to him?" Her answer was, "No, he did |
| 12 | Q. So in other words, you just don't remember | 12 | not." |
| | it? | 13 | Do you have any reason to disagree |
| 14 | A. I don't remember. | 14 | with what she says there? |
| 15 | Q. But it's possible it did happen, right? | 15 | A. I don't recall. |
| 16 | A. I don't remember. | 16 | Q. You just don't remember, right? |
| 17 | Q. So it's possible it happened, you just | 17 | A. Yeah. |
| 18 | don't remember? | 18 | Q. Okay. Then she's asked the question, if |
| 19 | A. I don't remember, yeah. | 19 | you go in the middle of the page it says, "Did uh |
| 20 | Q. Okay. If you turn to page 8 the pages | 20 | excuse me. Has anybody else in the ER room that |
| 21 | are on the top do you see where it says, "Q. Did | 21 | you've worked with ever come to you, or have you ever |
| 22 | anybody, um, did you talk to anybody about this?" | 22 | talked to anybody that shared similar concerns that |
| 23 | And she says, "I did. I told another male. His name | 23 | you do about Mr. Farmer?" |
| | | 24 | And her answer was, "Um, the same |
| | • | 1 | |
| 24 25 | is Ray Sumera." Do you see that? A. Yeah. | 24 25 | And her answer was, "Um, the same nurse had told me another time that he to watch |



: المر

ميزيويني

(22)

| | NE DOE vs. VALLEY HEALTH SYSTEM LLC | , | 81-04 |
|---|---|--|--|
| | Page 81 | | Page 83 |
| | him around my female patients, that he was concerned | 1 | A. I cannot say. I don't know. |
| | because he was very overly attentive with female | 2 | Q. Well, she's either lying or you're lying. |
| | patients, and very anxious to connect them to the | 3 | So which is it? |
| | monitors and disconnect them from the monitors, which | 4 | MR. BEMIS: I object to the form of the |
| 5 | would require him to reach into their clothing." | 5 | question. |
| 6 | Do you not remember that? | 6 | THE WITNESS: I don't remember the |
| 7 | A. No, I don't remember saying that. | 7 | conversation. |
| 8 | Q. But you don't have any reason to disagree | 8 | BY MR. MURDOCK: |
| 9 | with what she said, you just don't remember? | 9 | Q. So you don't remember the conversation? |
| 10 | A. I don't remember that, yeah. | 10 | A. No, as far as that. |
| 11 | Q. Okay. Was there a nurse by the name of | 11 | Q. Do you believe that Ms. Wolfe made it up? |
| 12 | Julie who worked in the ER at the time? | 12 | A. I don't know that. |
| 13 | A. Julie what? | 13 | Q. Ms. Wolfe told the police this. Do you |
| 14 | Q. I don't know. Julie who worked the | 14 | believe she was lying to the police when she said |
| 15 | dayshift. | 15 | that? |
| 16 | A. It's seven years. I don't remember. | 16 | A. I wouldn't know. |
| 17 | Q. Do you remember outside the one | 17 | MR. BEMIS: I object to form. |
| 18 | conversation you talked about with us between you and | 18 | BY MR. MURDOCK: |
| 19 | Ms. Wolfe, do you remember any other conversations | 19 | Q. Well, you would know, because you were par |
| 20 | between you and Ms. Wolfe specifically? | 20 | of the conversation. |
| 21 | A. No. | 21 | A. Yeah. |
| 22 | Q. If Ms. Wolfe said that you were suspicious | 22 | Q. So if you don't remember it, it's one |
| 23 | of Mr. Farmer, would you have any reason to disagree | 23 | thing. If you're saying it didn't happen, that's |
| 24 | with that statement? | 24 | quite another. |
| 25 | MR. BEMIS: I object to form. | 25 | A. Let's put it this way. I don't remember. |
| | Page 82 | | Page 84 |
| 1 | BY MR. MURDOCK: | 1 | Q. Okay. We can live with that. |
| 2 | Q. Or do you just not remember it? | 2 | Now, if you turn to page 13, |
| 3 | A. As far as suspicions for | 3 | towards the bottom there's a question that says, |
| | | 0 | towards the bottom thore a question that says, |
| | | 4 | |
| 4 | Q. Like what we were talking about before. | | "Was and is Ray a nurse also, or is he" and she |
| 4 5 | Q. Like what we were talking about before.A. I would do something else, if it warrants | 4 5 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she |
| 4 5 6 | Q. Like what we were talking about before.A. I would do something else, if it warrants something be done. | 4 5 6 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a |
| 4 5 6 7 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with | 4 5 6 7 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. |
| 4 5 6 7 8 | Q. Like what we were talking about before.A. I would do something else, if it warrants something be done.Q. Do you remember having a conversation with her? | 4 5 6 7 8 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? |
| 4 5 7 8 9 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. | 4 5 6 7 8 9 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. |
| 4 5 7 8 9 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you | 4 5 7 8 9 10 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? |
| 4 5 7 8 9 10 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly | 4 5 7 8 9 10 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. |
| 4 5 6 7 8 9 10 11 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to | 4 5 7 8 9 10 11 12 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your |
| 4 5 6 7 8 9 10 11 12 13 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from | 4 5 7 8 9 10 11 12 13 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reasonable. |
| 4 5 7 8 9 10 11 12 13 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into | 4 5 7 8 9 10 11 12 13 14 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reaso to disagree with any of the statements that Ms. Wolfe |
| 4 5 6 7 8 9 10 11 12 13 14 15 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't | 4 5 7 8 9 10 11 12 13 14 15 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? |
| 4 5 6 7 8 9 10 11 12 13 14 15 16 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? | 4 5 7 8 9 10 11 12 13 14 15 16 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead |
| 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. |
| 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. Okay. It's possible you did, you just | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. |
| 4 5 6 7 8 9 10 11 12 3 14 15 16 17 18 19 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. Okay. It's possible you did, you just don't remember it, right? | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. |
| 4 5 6 7 8 9 10 11 12 3 14 15 16 17 18 19 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. Okay. It's possible you did, you just don't remember it, right? A. I don't remember making that statement. | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reason to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. I mean it's what she said. We'll look at it as that. BY MR. MURDOCK: |
| 4 5 6 7 8 9 10 11 2 3 4 15 16 17 18 19 20 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. But it's possible you did, right? | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reasor to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: 1 object to form. Go ahead and answer. THE WITNESS: 1 don't see any reason. I mean it's what she said. We'll look at it as that. BY MR. MURDOCK: Q. And again, you just don't remember the |
| 4 5 6 7 8 9 10 11 2 13 14 15 16 17 18 9 20 21 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. But it's possible you did, right? A. Possible. I don't think so. | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reasor to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. I mean it's what she said. We'll look at it as that. BY MR. MURDOCK: Q. And again, you just don't remember the conversation? |
| $\begin{array}{c} 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22$ | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. But it's possible you did, right? A. Possible. I don't think so. Q. You don't think so? | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reasor to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. I mean it's what she said. We'll look at it as that. BY MR. MURDOCK: Q. And again, you just don't remember the conversation? A. Yes, I don't remember the conversation. |
| 4 5 6 7 8 | Q. Like what we were talking about before. A. I would do something else, if it warrants something be done. Q. Do you remember having a conversation with her? A. No. Q. So when Ms. Wolfe told the police that you were very concerned because Farmer was overly attentive with female patients and very anxious to connect them to the monitors and disconnect them from the monitors, which would require him to reach into their clothing, you said before you just didn't remember making that statement, is that correct? A. I don't remember making that statement. Q. But it's possible you did, right? A. Possible. I don't think so. | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | "Was and is Ray a nurse also, or is he" and she answers, "Yes." The question, "Okay." And then she states, "He's a nurse, and occasionally works as a charge nurse." Speaking about you. Is that true? A. Yes. Q. She was truthful there, right? A. Yes. Q. Okay. Outside of not remembering your conversations with Ms. Wolfe, do you have any reasor to disagree with any of the statements that Ms. Wolfe has stated, that I've already told you about? MR. BEMIS: I object to form. Go ahead and answer. THE WITNESS: I don't see any reason. I mean it's what she said. We'll look at it as that. BY MR. MURDOCK: Q. And again, you just don't remember the conversation? A. Yes, I don't remember the conversation. Q. You're not saying it didn't occur? |



iterar (

| | Page 8 | |
|---|--|--|
| 1 | Q. Okay. Renato, in between the time of May | 1 Q. Okay. And do you recall what you started |
| 2 | 2008 and now, have you gotten any raises? | 2 at at Centennial Hills back in 2008? |
| 3 | A. No. Yeah, I'm pretty sure; but lately, no. | 3 A. No. |
| 4 | Q. You said, "Yeah, I'm pretty sure; but | 4 Q. Can you give me an estimate of what you |
| 5 | lately, no." Tell me about that. | 5 started at? In other words, was it below 40? |
| 6 | A. I'm at the top scale already, I believe. | 6 A. Probably below 40, yeah. |
| 7 | Q. Oh, okay. When did you get to the top | 7 Q. Was it below 30? |
| 8 | scale? Before 2008? | 8 A. I don't know. Maybe between 30 and 40. |
| 9 | A. After. Way after. | 9 Q. Okay. Maybe 35? |
| 10 | Q. How long after? | 10 A. Maybe. |
| 11 | A. Maybe the past two years. | 11 Q. That's a number in between 30 and 40, |
| 12 | Q. And in the past two years, that's when you | 12 right? |
| 13 | got to the top scale, right? | 13 A. Yeah. |
| 14 | A. Yeah. | 14 Q. So would you agree with me that since 2008 |
| 15 | Q. Did you get any bonuses from the hospital | |
| | A. We're not that lucky, no. | 16 approximately \$13 an hour or so? |
| 16 | | 17 A. Yeah, okay. |
| 17 | Q. Do you get vacations? | 18 Q. And again, that raise is not guaranteed, |
| 18 | A. Yeah. PTO they call it. | |
| 19 | Q. And that's per your agreement with them | 19 right? |
| 20 | from the beginning, right? | 20 A. No. |
| 21 | A. With the hospital, yes. | Q. Ray, why don't you do me a favor. I want |
| 22 | · - | 22 you to look at Exhibit 1. I want you to take your |
| 23 | | 23 time and I want you to read it. |
| 24 | Q. Are you a member of a union? | 24 A. Exhibit 1? |
| 25 | A. No. | 25 Q. Yeah, the whole document. I want you to |
| | Page 8 | |
| 1 | Q. And do you know what percentage your raise | a 1 read it alray? |
| | | |
| 2 | are? | 2 MR. SILVESTRI: To himself? |
| 2 3 | | |
| | are? | 2 MR. SILVESTRI: To himself? |
| 3 | are? A. No. | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. |
| 3 4 | are? A. No. Q. From the time you started working at | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little |
| 3 4 5 6 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little break? |
| 3 4 5 6 7 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little break? MR. MURDOCK: We can take a break. I |
| 3 4 5 6 7 8 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little break? MR. MURDOCK: We can take a break. I just don't want to go off the record necessarily. |
| 3 4 5 6 7 8 9 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. 1 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. 1 just don't |
| 3 4 5 7 8 9 10 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. |
| 3 4 5 6 7 8 9 10 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) |
| 3 4 5 6 7 8 9 10 11 12 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: |
| 3 4 5 6 7 8 9 10 11 12 13 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 |
| 3 4 5 6 7 8 9 10 11 12 13 14 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is |
| 3 4 5 6 7 8 9 10 11 12 13 14 15 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. 1 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. 1 just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? |
| 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. 1 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. 1 just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. |
| 3 4 5 6 7 8 9 10 11 2 3 14 15 16 17 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the |
| 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17 18 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. 1 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. 1 just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the 18 conversations between you and Ms. Wolfe, do you have |
| 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17 18 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little break? MR. MURDOCK: We can take a break. I just don't want to go off the record necessarily. I'm not going to be asking any questions until he finishes reading it. I just don't want him to be coached by his non-lawyer. (Pause in the proceedings.) BY MR. MURDOCK: Q. Sir, I've shown you Plaintiff's Exhibit 1 and you've had a chance to read it completely, is that correct? A. Yes. Q. Outside of not remembering the conversations between you and Ms. Wolfe, do you have any reason to disagree with any of the other |
| 3 4 5 6 7 8 9 10 11 2 13 14 5 16 17 18 19 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the 18 conversations between you and Ms. Wolfe, do you have 19 any reason to disagree with any of the other 20 statements that she makes in that statement? |
| 3 4 5 6 7 8 9 10 11 2 13 4 15 16 7 18 9 10 11 2 13 14 15 16 17 18 19 20 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the 18 conversations between you and Ms. Wolfe, do you have 19 any reason to disagree with any of the other 20 statements that she makes in that statement? 21 MR. BEMIS: I object to form. Calls |
| 3 4 5 6 7 8 9 10 11 2 13 14 5 16 7 8 9 10 11 2 13 14 5 16 17 18 19 20 1 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. Q. What's the top? A. I guess where I'm at. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. I 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. I just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the 18 conversations between you and Ms. Wolfe, do you have 19 any reason to disagree with any of the other 20 statements that she makes in that statement? |
| 3 4 5 6 7 8 9 101 12 13 4 15 6 7 8 9 101 12 13 14 15 16 17 18 19 201 221 22 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. Q. What's the top? A. I guess where I'm at. Q. What is it? | MR. SILVESTRI: To himself? MR. MURDOCK: Yes. MR. SILVESTRI: Can we take a little break? MR. MURDOCK: We can take a break. I just don't want to go off the record necessarily. I'm not going to be asking any questions until he finishes reading it. I just don't want him to be coached by his non-lawyer. (Pause in the proceedings.) BY MR. MURDOCK: Q. Sir, I've shown you Plaintiff's Exhibit 1 and you've had a chance to read it completely, is that correct? A. Yes. Q. Outside of not remembering the conversations between you and Ms. Wolfe, do you have any reason to disagree with any of the other statements that she makes in that statement? MR. BEMIS: I object to form. Calls |
| 3 4 5 6 7 8 | are? A. No. Q. From the time you started working at Centennial Hills in 2008 until now, how much of an increase are we talking about? A. I don't remember. Q. Well, are we talking a few bucks, or are we talking several thousand dollars? A. Only a few bucks. Q. A few bucks per hour? A. Yeah, per hour. Q. But that can grow to A. Yeah, but I don't remember the last raise I had. It's been awhile. Q. Because you're at the top? A. Yeah. Q. What's the bottom and what's the top? A. I don't know that. Q. What's the top? A. I guess where I'm at. Q. What is it? A. Maybe 49. | 2 MR. SILVESTRI: To himself? 3 MR. MURDOCK: Yes. 4 MR. SILVESTRI: Can we take a little 5 break? 6 MR. MURDOCK: We can take a break. 1 7 just don't want to go off the record necessarily. 8 I'm not going to be asking any 9 questions until he finishes reading it. 1 just don't 10 want him to be coached by his non-lawyer. 11 (Pause in the proceedings.) 12 BY MR. MURDOCK: 13 Q. Sir, I've shown you Plaintiff's Exhibit 1 14 and you've had a chance to read it completely, is 15 that correct? 16 A. Yes. 17 Q. Outside of not remembering the 18 conversations between you and Ms. Wolfe, do you have 19 any reason to disagree with any of the other 20 statements that she makes in that statement? 21 MR. BEMIS: I object to form. Calls 22 for speculation. To the extent you know, you can |

ESQUIRE

) .

| 07 | INE DUE VS. VALLEY HEALTH SYSTEM LL | | 89–9 |
|----------|---|-----|--|
| 1 | Page 89 BY MR. MURDOCK: | | A. Why? Page 9 |
| 2 | Q. I know. You've already said you don't | 1 2 | A. Why? Q. Yeah. |
| 3 | remember. | 3 | |
| 4 | A. Right. | 4 | A. Because there might be a procedure going on, for one thing. |
| 5 | Q. But aside from not remembering the | 5 | Q. Okay. |
| 6 | conversations, do you have any reason to disagree | 6 | |
| 7 | with anything else she says in that statement? | 7 | A. They could be undressing the patient. Those are some things. |
| 8 | MR. BEMIS: Same objection. | 8 | Q. All right. Is it important for CNAs, as |
| 9 | THE WITNESS: That's hard to answer. | 9 | well as RNs like yourself, to be somewhat modest with |
| 10 | | 10 | |
| 11 | Q. Tell me why it's hard to answer. | 11 | A. Yes. |
| 12 | | 12 | |
| 13 | | 13 | |
| 14 | | 14 | , , , |
| 15 | | 15 | |
| 16 | | 16 | Q. And help me out. The ER at Centennial, at |
| 17 | - | 17 | |
| 18 | Q. Thank you. | 18 | Ms. Wolfe, were there actual doors on the particular |
| 19 | MR. MURDOCK: I'll pass the witness. | 19 | rooms where a patient would be, or were they just |
| 20 | Mit. Morebook. The pass the wittess. | 20 | curtains? |
| 21 | EXAMINATION | 21 | A. Some has doors, some has curtains. |
| 22 | | 22 | Q. So it was both? |
| 23 | Q. I'm just going to follow up on this | 23 | A. Yeah. |
| 24 | statement, Mr. Sumera, since you've got it in front | 24 | Q. And would you expect a CNA to knock on a |
| 25 | of you. | 25 | patient's room that just had a curtain? |
| | | | - |
| 1 | Page 90 Correct me if I'm wrong, but I | 1 | A. It's easy. Just knock on the side. |
| | believe you testified that Ms. Wolfe came to you and | 2 | Q. But to knock nonetheless? |
| | asked you to speak to Mr. Farmer about how he dealt | 3 | A. Knock, yeah. |
| | with female patients generally, correct? | 4 | Q. For the same purposes that you just cited? |
| 5 | A. Yes. | 5 | A. Correct. |
| 6 | Q. And more specifically, this is where I'm | 6 | Q. And the second thing that she asked you to |
| | not clear. | | instruct him was to ask the nurse – I take it the |
| 8 | Did she ask you to address with | | registered nurse – if a patient needed a heart |
| | him how he dealt with female patients in attaching or | | monitor, before just going in and attaching one? |
| | not attaching, affixing, whatever, adjusting heart | 10 | A. That's what I told Steve, yeah. |
| 11 | monitor leads? | 11 | Q. That's what you told him? |
| 12 | A. What I recall as far as talking to Mr. | 12 | A. Yeah. |
| 13 | Farmer is make sure to knock before entering the room | 13 | Q. Did Ms. Wolfe ask you to tell him that? |
| 14 | of the patient. To ask the nurse whether the patient | 14 | A. If I recall I don't remember exactly, |
| 15 | needs the heart monitor on, or whether they need to | 15 | but she told me to make sure that Steve knocks first, |
| 16 | be in a gown. | 16 | Like I said, to knock first and ask the nurse first. |
| 17 | So that's what I remember telling | 17 | Q. And that was to ask the nurse first about |
| 18 | him. | 18 | what? What was he supposed to ask the nurse about? |
| 19 | Q. So I want to just break it down. | 19 | A. Whether the patient needs a heart monitor |
| 20 | The first thing she asked you to | 20 | and/or put a gown on. |
| 21 | address with him was to knock on the patient's door | 21 | Q. And/or put a gown on. Okay. |
| 22 | before entering. | 22 | Was Ms. Wolfe's request of you |
| 23 | A. Yeah. | 23 | abnormal? Did that seem to fit the policy and |
| | Q. Why would a CNA knock on a patient's door | 24 | procedures of Centennial Hills Hospital, to your |
| 24 | | | |
| 24 25 | before entering? | 25 | knowledge? |



| | INE DOE VS. VALLEY HEALTH SYSTEM LL | | |
|--|--|--|---|
| 1 | Page 93 A. I mean I get asked questions all the time. | | Page 9 |
| 2 | | 1 | Q. Do you recall if you asked anybody superior |
| | To me it's normal. Sometimes you forget to knock, so | | to yourself to document what you had done that day? |
| 3 | maybe at that time I reminded him to knock. | 3 | A. No. |
| 4 | Q. But to ask him to knock was not an abnormal | 4 | Q. Would you normally do that? |
| 5 | request, was it? | 5 | A. As far as? |
| 6 | A. No. | 6 | Q. Would you go to your charge nurse or your |
| 7 | Q. That was something that you might ask any | 7 | superior and say, "I instructed or trained Mr. Farmer |
| 8 | CNA to do, correct? | 8 | in these procedures today? |
| 9 | A. Correct. | 9 | A. No, I wouldn't. |
| 10 | | 10 | Q. Okay. And I'm looking to find out if there |
| 11 | | 11 | would be anything in writing that maybe you could |
| 12 | attached or adjusted, that would be a normal request? | 12 | look at that would refresh your recollection. |
| 13 | A. Yes. | 13 | Do you think there would be? |
| 14 | Q. And to ask a CNA to go to the nurse first | 14 | A. No. |
| 15 | to find out if a patient needed to be gowned, that | 15 | Q. Okay. Now, dealing with the heart monitor, |
| 16 | would be a normal request? | 16 | |
| 17 | A. Yes. | 17 | I believe a 3-lead heart monitor. |
| 18 | Q. Were you uncomfortable in making those | 18 | A. Okay. I'm getting confused. In the ER |
| 19 | requests of Mr. Farmer? | 19 | there are 5 leads. In the recovery room where I work |
| 20 | A. No. It's my job to instruct people. | 20 | now, there are 3 leads. |
| 21 | Q. And I might have missed this. | 21 | Q. Okay. For the heart monitors? |
| 22 | Why do you think Ms. Wolfe came to | 22 | A. Exactly, for the heart monitors. |
| 23 | you to ask Mr. Farmer or to instruct Mr. Farmer in | 23 | Q. Okay. Do you know what type of heart |
| 24 | such a way? | 24 | monitor, whether it's a 3-lead or 5-lead, would be |
| 25 | A. Again, to respect the privacy of the | 25 | used on one of the floors where patients if they |
| 20 | A. Again, to respect the privacy of the | | ased on one of the noors where patients If they |
| 1 | Page 94 patient. | 4 | Page 96 |
| 1 2 | Q. Why didn't she, as opposed to coming to | 1 | needed it, where patients are eventually taken from |
| | | 2 | the ER? |
| 3 | you | 3 | MR. BEMIS: Objection. Foundation. |
| 4 | A. I don't know what her reason was at that | 4 | THE WITNESS: The only hardwired |
| 5 | time. | 5 | |
| | O Manual and a star share are a that shall be | | monitor will be in the ICU, and everybody else that |
| 6 | Q. You weren't acting charge nurse that night? | 6 | needs a telemetry monitor will be on a wireless |
| 7 | A. I don't know specifically if that night I | 6 7 | needs a telemetry monitor will be on a wireless telemetry box. |
| 7 8 | A. I don't know specifically if that night I was in charge or not. | 6 7 8 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: |
| 7 8 9 | A. I don't know specifically if that night Iwas in charge or not.Q. And would this have been on an evening | 6 7 8 9 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just |
| 7 8 9 10 | A. I don't know specifically if that night I was in charge or not.Q. And would this have been on an evening shift? | 6 7 8 9 10 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. |
| 7 8 9 10 11 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's | 6 7 8 9 10 11 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? |
| 7 8 9 10 11 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. | 6 7 8 9 10 11 12 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. |
| 7 8 9 10 11 12 13 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment | 6 7 8 9 10 11 12 13 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be |
| 7 9 10 11 12 13 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain | 6 7 8 9 10 11 12 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. |
| 7 9 10 11 12 13 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment | 6 7 8 9 10 11 12 13 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be |
| 7 8 9 10 11 12 13 14 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain | 6 7 8 9 10 11 12 13 14 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a |
| 7 8 9 10 11 12 13 14 15 16 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? | 6 7 8 9 10 11 12 13 14 15 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. A. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. |
| 7 8 9 10 11 12 13 14 15 16 17 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? | 6 7 8 9 10 11 12 13 14 15 16 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a |
| 7 8 9 10 11 12 13 14 15 16 17 18 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment | 6 7 8 9 10 11 12 13 14 15 16 17 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? |
| 7 8 9 10 11 12 13 14 15 16 17 18 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm just a staff nurse to begin with, and a relief | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. Q. And the leads come out of the wall, or out |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm just a staff nurse to begin with, and a relief charge. | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. Q. And the leads come out of the wall, or out of the monitor? |
| 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm just a staff nurse to begin with, and a relief charge. Q. And you have to understand I don't know the | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. Q. And the leads come out of the wall, or out of the monitor? A. The leads come out of the wall and into the |
| 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm just a staff nurse to begin with, and a relief charge. Q. And you have to understand I don't know the policies and procedures at the hospital, so | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. Q. And the leads come out of the wall, or out of the monitor? A. The leads come out of the wall and into the chest leads on a patient. |
| 7 8 | A. I don't know specifically if that night I was in charge or not. Q. And would this have been on an evening shift? A. It should be on the evening shift. That's what he worked. Q. Would you document that in an employment file, that you instructed a CNA on certain procedures? Would that be documented anywhere? A. As far as? Q. Would you have put it in his employment file or agency file? A. I don't think I have that capacity. I'm just a staff nurse to begin with, and a relief charge. Q. And you have to understand I don't know the | 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | needs a telemetry monitor will be on a wireless telemetry box. BY MR. SILVESTRI: Q. You'll have to help me out. Let me just break it down. Where was the ICU back in 2008? A. 5th floor. Q. 5th floor. And in the ICU, what would be present there? A what? A. The heart monitor. Q. And you mentioned something about a hardwired heart monitor. What does that mean? A. That means the monitor is attached to a wall. Q. And the leads come out of the wall, or out of the monitor? A. The leads come out of the wall and into the |



م موجع بر و م

 $\sum_{i=1}^{n}$

| JAN | NE DOE vs. VALLEY HEALTH SYSTEM LL(| С | 97–100 |
|--|---|--|---|
| | Page 97 | <u> </u> | Page 99 |
| 1 | A. It would be a 5-lead. | 1 | Q. Do you fondle their nipples as you do that? |
| 2 | Q. And you told us that the 3-lead placement | 2 | A. No. |
| 3 | would be in the left clavicle area, the right | 3 | Q. Can you imagine any situation where you, as |
| 4 | clavicle area, and then the left | 4 | a registered nurse, would have to do that in |
| 5 | A. The left lateral. | 5 | attaching these leads or adjusting these leads? |
| 6 | Q the left lateral area? | 6 | A. No. |
| 7 | A. Yeah. | 7 | Q. And let's just take it to the 12-lead EKG |
| 8 | Q. And you're pointing and I know part of | 8 | monitors. Would you ever have to fondle a female |
| 9 | it is on video, but you pointed underneath the armpit | 9 | patient's breast to attach or adjust those leads? |
| 10 | underpart down about 6 inches? | 10 | A. It depends on the size of the woman's |
| 11 | A. Yeah. | 11 | breast. |
| 12 | Q. Where would the other two leads go, if it's | 12 | Q. Would you ever have to pinch her nipple to |
| 13 | a 5-lead? | 13 | do that? |
| 14 | A. If it's a 5-lead the other one would go in | 14 | A. No. |
| 15 | the middle of the chest, and the fifth th one would | 15 | Q. Now, let me ask you some questions about |
| 16 | go on the right lateral. | 16 | the 12-lead EKG. Back in 2008 were 12-lead EKGs used |
| 17 | Q. So you would have two up by the clavicle, | 17 | in the ER? |
| 18 | one in the middle of the chest, and then two on the | 18 | A. Yes. |
| 19 | lateral side of the ribs down below the armpit? | 19 | Q. And you have attached those to female and |
| 20 | A. Correct. | 20 | male patients? |
| 21 | Q. And then you started to say if not in the | 21 | A. Correct. |
| 22 | ICU, there would be a wireless. Help me out and tell | 22 | Q. Do CNAs attach 12-lead |
| 23 | me what that is. | 23 | A. They are not |
| 24 | A. The wireless would be for patients | 24 | Q. Let me finish, so we're not talking over |
| 25 | requiring heart monitoring who are being admitted to | 25 | one another. I apologize. |
| | • - | L | |
| 1 | Page 98 the hospital, and they can go anywhere on the floor | 1 | Page 100 A. Sorry. |
| | and they can still be monitored. | 2 | Q. Did CNAs attach or adjust 12-lead EKGs to |
| 3 | Q. So help me out. Just describe what it | 3 | male or female patients? |
| 4 | looks like. Are the leads in the same spots? | 4 | A. No. |
| 5 | A. The same spots, correct. | 5 | Q. That is something that's reserved to the |
| 6 | Q. And the wireless, would it be a 3-lead or a | | RNs? |
| 7 | 5-lead? | 7 | A. RNs and techs. |
| 8 | A. The wireless itself would require 5 leads. | 8 | Q. And techs. Okay. |
| 9 | Q. And then those leads go to a little box? | 9 | And I think you testified |
| 9 10 | A. A little box. | | earlier and if I say this wrong, correct me and |
| | Q. That is either attached to the patient or | | I think we were talking about heart monitors, you |
| 11 12 | at the patient's side? | 12 | |
| 12 13 | A. Yeah, correct. | 13 | heart monitors were attached correctly. |
| 15 | | 10 | - |
| | | 14 | A Yes |
| 14 | Q. Even if they're in bed? | 14 15 | A. Yes. Q is that a correct statement? |
| 14 15 | Q. Even if they're in bed?A. Typically they would be placed in a gown | 15 | Q. Is that a correct statement? |
| 14 15 16 | Q. Even if they're in bed?A. Typically they would be placed in a gown with a pocket. | 15 16 | Q. Is that a correct statement?A. Correct. |
| 14 15 16 17 | Q. Even if they're in bed?A. Typically they would be placed in a gown with a pocket.Q. I've seen those. Okay. | 15 16 17 | Q. Is that a correct statement?A. Correct.Q. Is that statement also true with respect to |
| 14 15 16 17 18 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean | 15 16 17 18 | Q. Is that a correct statement?A. Correct.Q. Is that statement also true with respect to the attachment of a 12-lead EKG? |
| 14 15 16 17 18 19 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not | 15 16 17 18 19 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. |
| 14 15 16 17 18 19 20 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not personal to you, but have you attached either 3 or | 15 16 17 18 19 20 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. Q. Is there any notification given to the |
| 14 15 16 17 18 19 20 21 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not personal to you, but have you attached either 3 or 5-lead heart monitors to female patients? | 15 16 17 18 19 20 21 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. Q. Is there any notification given to the staff at Centennial Hills back in 2008 of a heart |
| 14 15 16 17 18 19 20 21 22 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not personal to you, but have you attached either 3 or 5-lead heart monitors to female patients? A. Yes. | 15 16 17 18 19 20 21 22 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. Q. Is there any notification given to the staff at Centennial Hills back in 2008 of a heart monitor lead that becomes detached from the patient? |
| 14 15 16 17 18 19 20 21 22 23 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not personal to you, but have you attached either 3 or 5-lead heart monitors to female patients? A. Yes. Q. And in doing that, do you fondle their | 15 16 17 18 19 20 21 22 23 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. Q. Is there any notification given to the staff at Centennial Hills back in 2008 of a heart monitor lead that becomes detached from the patient? MR. BEMIS: I object to form. Calls |
| 14 15 16 17 18 19 20 21 22 | Q. Even if they're in bed? A. Typically they would be placed in a gown with a pocket. Q. I've seen those. Okay. Now, let me ask you, I don't mean to I'm going to get a little personal here not personal to you, but have you attached either 3 or 5-lead heart monitors to female patients? A. Yes. | 15 16 17 18 19 20 21 22 | Q. Is that a correct statement? A. Correct. Q. Is that statement also true with respect to the attachment of a 12-lead EKG? A. Correct. Q. Is there any notification given to the staff at Centennial Hills back in 2008 of a heart monitor lead that becomes detached from the patient? |

ESQUIRE

Page 101 Page 103 hardwired monitors in the ER? 1 assume they report back the heart monitor has become 1 2 BY MR. SILVESTRI: 2 detached in some way, shape or form. What happens Q. We'll start with the ER, because that's 3 then? 3 where you work. And I'll just give you a little 4 A. The RN will reattach it correctly. 4 background. 5 Q. And are these attachments done with the 5 6 little pads that sort of have a sticky substance on 6 I've got a family member that's them that glues onto the patient? 7 got a whole bunch of things attached to him, and 7 every once in awhile the machine would just "beep 8 A. Yes. 8 9 beep beep." So you know sort of what I'm 9 Q. Now, if a heart monitor lead is attached 10 talking about. 10 improperly, such that it's still sticking to the patient but is not monitoring the heart, would that A. Yes. 11 11 Q. If a 3 or 5-lead heart monitor -- one of 12 cause one of the alarms to go off? 12 A. It will show in the monitor itself, as far 13 those leads becomes detached from the patient, is 13 as lead placement. But again, ultimately the nurse 14 there any warning system? Do bells go off, whistles, 14 has to check the correct placement. 15 anything like that, that would notify the staff -- an 15 16 RN, CNA, whoever, a doctor -- somebody outside of the Q. And are any of the - let's deal with the 16 hardwired monitors. Do any of those report back to 17 room, that that monitor has become detached in some 17 the central nurse station? 18 18 way, shape or form? 19 A. I think when we first opened we didn't have A. Yes, there will be an alarm. 19 the central monitor. Don't quote me on this. We 20 20 Q. And is it in the patient's room, or is it only got the central monitor a few years later. 21 out in the central area where the nurses are? 21 22 A. In the patient's room. 22 Q. Okay. We just quoted you, but --23 A. That's fine. Q. So someone would hear that typically -- or 23 Q. No, I'm joking. All right. 24 the thought is somebody would hear that and would go 24 25 How about the portable monitors, in and fix that and stop the beeping from going on? 25 Page 104 Page 102 the ones that are not hardwired into the wall? If 1 1 A. Yes. 2 one of those becomes detached or is not operating 2 Q. And who is charged in the ER with doing 3 properly, is there some warning that goes off? 3 that? A. We help each other. The RNs. 4 A. Yes. 4 5 MR. BEMIS: Form. Foundation. Go Q. The RNs? 5 ahead and answer. 6 6 A. Yeah. Q. Would you send a CNA to go in and fix that 7 THE WITNESS: Yes. In the telemetry 7 room on the 5th floor, there's staff members that 8 8 problem? monitors those telemetry boxes. Wherever the patient A. They can help us. 9 9 is located, they will call that department. Q. Would you send them in by themselves to fix 10 10 BY MR. SILVESTRI: 11 11 that problem? Q. So if the patient was on the 6th floor 12 A. Yes. 12 where they don't have the hardwired, and something 13 13 Q. They would know where to attach it? A. No, they will make sure the patient is becomes detached or is not working properly, that 14 14 becomes reported to a telemetry room on the 5th 15 okay, first of all. 15 16 floor? Q. Okay. 16 A. Look at the monitor and let us know what's 17 A. Correct. 17 Q. And they would call and say, "Patient Smith 18 going on. 18 or Patient Silvestri in room 605 -- you've got to go Q. Okay. They would come typically, or are 19 19 20 check it?" asked to come back and report to the RN that's 20 21 A. Correct. 21 responsible for that room? 22 Q. Is there any other bell or warning system A. Yes. 22 23 that goes off on the 6th floor, where I'm located, Q. That's what goes on in the ER? 23 24 the patient, that tells somebody that something is A. In the ER. 24 going wrong? 25 Q. And then once they report back - and let's 25



.i.. }

÷,

| Page 1051A. As far as the heart monitor, no.1far as attaching and detail2Q. How about as far as a 12-lead EKG monitor?2involved in that?3MR. BEMIS: I object to form.3A. No.4THE WITNESS: That's a one-time event.3A. No.5As soon as you get the reading from the EKG, or5A. No.6printout, you just turn off the machine. You get the6Q. Okay. I appreciate7piece of paper where the 12-lead reading is, and show8Does Centening9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes.11you're educating me, and I appreciate that.11Q. Or something aking | ed in that? |
|--|-----------------------------|
| 2Q. How about as far as a 12-lead EKG monitor?2involved in that?3MR. BEMIS: I object to form.3A. No.4THE WITNESS: That's a one-time event.3A. No.5As soon as you get the reading from the EKG, or5A. No.6printout, you just turn off the machine. You get the6Q. Okay. I appreciate7piece of paper where the 12-lead reading is, and show8Does Centent8it to the physician.8Does Centent9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes. | ed in that? |
| 3MR. BEMIS: I object to form.3A. No.4THE WITNESS: That's a one-time event.4Q. Is the CNA involve5As soon as you get the reading from the EKG, or5A. No.6printout, you just turn off the machine. You get the6Q. Okay. I appreciate7piece of paper where the 12-lead reading is, and show7much for explaining that to8it to the physician.8Does Centent9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes. | |
| 4THE WITNESS: That's a one-time event.4Q. Is the CNA involve5As soon as you get the reading from the EKG, or5A. No.6printout, you just turn off the machine. You get the6Q. Okay. I appreciate7piece of paper where the 12-lead reading is, and show7much for explaining that to8it to the physician.9Does Centent9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes. | |
| 5 As soon as you get the reading from the EKG, or 6 printout, you just turn off the machine. You get the 7 piece of paper where the 12-lead reading is, and show 8 it to the physician. 9 BY MR. SILVESTRI: 10 Q. Help me out here for a second, because 5 A. No. 6 Q. Okay. I appreciate 7 much for explaining that to 8 Does Centerning 9 have a Patient's Bill of Right 10 A. Yes. | |
| 6 printout, you just turn off the machine. You get the 7 piece of paper where the 12-lead reading is, and show 8 it to the physician. 9 BY MR. SILVESTRI: 10 Q. Help me out here for a second, because 6 Q. Okay. I appreciate 7 much for explaining that to 8 Does Centenni 9 have a Patient's Bill of Rig 10 A. Yes. | |
| 7piece of paper where the 12-lead reading is, and show7much for explaining that to8it to the physician.8Does Centend9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes. | |
| 7piece of paper where the 12-lead reading is, and show7much for explaining that to8it to the physician.8Does Centent9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q.Help me out here for a second, because10A. | e that. Thank you very |
| 8it to the physician.8Does Centern9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q.Help me out here for a second, because10A.Yes. | |
| 9BY MR. SILVESTRI:9have a Patient's Bill of Rig10Q. Help me out here for a second, because10A. Yes. | |
| 10 Q. Help me out here for a second, because 10 A. Yes. | • |
| | gino. |
| | n to that? |
| | |
| 12 So if a patient needs a 12-lead 12 A. The patient has a | lot of rights in our |
| 13 EKG, is it typical that a tech brings that machine 13 hospital. | |
| 14 in? 14 Q. Are they posted? | |
| 15 A. Yes. 15 A. Are they posted? | |
| | s where they have the |
| 17 A. Yes. 17 Patient's Bill of Rights. T | - |
| | |
| | o postad |
| | |
| 20 Q. How long does it take that test to be done? 20 Q. Have you seen th | lentr |
| 21 A. Timewise, between it depends. If 21 A. In my readings. | |
| 22 there's movement, we have to wait until it's nice and 22 Q. In the ER, you've | |
| 23 clear. 23 if I'm wrong, and I'm goin | |
| 24 Q. Let's assume that all the leads get 24 was close to a quote C | NAs are always directed by |
| 25 attached, there's no movement and the test is being 25 the charge nurse or the r | egistered nurse assigned to |
| Page 106 | Page 108 |
| 1 conducted. How long? 1 the patient's room, as to the patient's room, as the patient's room, as to the patient's room, as the patien | ne tasks they're supposed |
| 2 A. Two to three minutes. 2 to perform. | |
| 3 Q. And the tech is there when this is 3 A. Yes. | |
| 4 happening? 4 Q. Is that an accurate | e statement? |
| 5 A. Yes. 5 A. Yes. | |
| | heir activities or findings |
| 7 is any of the shorte? | 5 |
| | piect to form |
| | ojeet to torm: |
| 9 and then show the hard copy form to the physician. 9 BY MR. SILVESTRI: | a a nationt bacques |
| 10 Q. Do they detach the leads from the patient? 10 Q. If they go in to see | |
| | o do that, do the CNAs char |
| 12 Q. And then they move on and go to the next 12 that? | |
| 13 patient where they've been asked to do that? 13 A. At that time, no. | |
| 14 A. Correct. 14 Q. And when you say | y "at that time," what's |
| 15 Q. So these techs sort of float around the 15 "that time?" | |
| 16 hospital, depending on where they're asked to go do a 16 A. We weren't compu | uterized then. |
| | |
| | at that you to taking |
| 10 A. Conton | |
| 19 Q. So typically if a tech comes down into the 19 A. Correct, yeah. | |
| 20 EX booduoo and physical and a | ve handwritten anything in |
| 21 test, the tech would go do that, give the results to 21 a chart? | |
| | piece of paper and given |
| zz uib douloi, and doudon no parions and you do no net in the restauration of a | |
| | |
| 23 probably wouldn't be involved in that. Is that fair? 23 to the nurse. | he nurse do with that? |
| 23 probably wouldn't be involved in that. Is that fair? 23 to the nurse. | |



. موقع م

- 12 A }

| ٢ | NE DOE vs. VALLEY HEALTH SYSTEM LL(| | 109–112 |
|---|--|---|--|
| | Page 109 | 1 | Page 111 |
| 1 | Q. So if a CNA did a task, the CNA would | 1 | for my protection also. |
| 2 | record that on a piece of paper. A big piece of | 2 | Q. Okay. What I want to know is I |
| 3 | paper, a little piece of paper? | 3 | understand that that's Mr. Sumera's practice. |
| 4 | A. Scratch paper. | 4 | Did you see that as the general |
| 5 | Q. Scratch paper. And then would hand that to | 5 | practice of your co-workers at Centennial Hills |
| 6 | somebody like yourself, the nurse, and what would you | 6 | Hospital in 2008? |
| 7 | do with it? | 7 | MR. BEMIS: Calls for speculation. |
| 8 | A. It depends on what he's recording. If it's | 8 | THE WITNESS: I don't really know |
| 9 | vital signs, I would put the vital signs in the | 9 | what's going on in the room at that time. The ER is |
| 10 | chart. | 10 | very busy. |
| 11 | Q. And what do you mean by "vital signs?" | 11 | BY MR. SILVESTRI: |
| 12 | A. The blood pressure, pulse, respiration, and | 12 | Q. Understood. Have you ever discussed this |
| 13 | temperature. | 13 | issue with any of your co-workers? |
| 14 | Q. Okay. Are you trained to catheterize a | 14 | A. No. Only if I need their help to do a |
| 15 | patient? | 15 | catheter on a female. |
| 16 | A. Yes. | 16 | Q. If the nurse needs help you will assist |
| 17 | Q. And I'm talking about specifically for | 17 | with a female patient? |
| 18 | urine discharge. I want to talk about that kind of a | 18 | A. Yes. |
| 19 | catheter. Is that what you're talking about? | 19 | Q. Where you've been told by a doctor to |
| | A. A urine discharge? What do you mean by | 20 | catheterize or have a female patient catheterized, |
| 20 | | 20 | have you ever instructed a CNA to do that? |
| 21 | that? | | - |
| 22 | Q. Catheterize a patient so that they can | 22 23 | A. That's not their job, so the answer is no. |
| 23 | discharge urine. | | Q. Thank you. And I prefaced that with |
| 24 | A. Oh, yeah, to empty a bladder. | 24 | respect to a female patient. |
| 25 | Q. Yeah, empty their bladder. Urine comes | 25 | Is that true with respect male |
| | Page 110 | | Page 112 |
| | from the bladder, right? | | patients? In other words, would you ask a CNA to |
| 2 | A. Yeah. | 1 | catheterize a male patient? |
| 3 | Q. And you're talking to a lawyer here, I'm | 3 | A. A CNA cannot catheterize a patient. |
| | not a doctor, so help me out. | 4 | Q. Any patient? |
| 5 | Do you do that to patients | 5 | A. Any patient. |
| | sometimes? | 6 | Q. Are CNAs asked to you know, the catheter |
| 7 | A. Only if ordered by a doctor. | | comes out of the person's body, and usually the urine |
| 8 | Q. And if you are ordered by a doctor that | | |
| | | - | drains into some kind of a vessel. Sometimes it's at |
| 9 | Patient Silvestri needs to have a catheter by the | 9 | the end of the bed, or wherever it might be located. |
| 9 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a | 9 10 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of |
| 9 | Patient Silvestri needs to have a catheter by the | 9 10 11 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? |
| 9 10 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. | 9 10 11 12 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. |
| 9 10 11 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. | 9 10 11 12 13 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of |
| 9 10 11 12 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do | 9 10 11 12 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? |
| 9 10 11 12 13 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. | 9 10 11 12 13 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. |
| 9 10 11 12 13 14 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do | 9 10 11 12 13 14 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? |
| 9 10 11 12 13 14 15 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody | 9 10 11 12 13 14 15 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. |
| 9 10 11 12 13 14 15 16 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? | 9 10 11 12 13 14 15 16 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? |
| 9 10 11 12 13 14 15 16 17 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, | 9 10 11 12 13 14 15 16 17 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. |
| 9 10 11 12 13 14 15 16 17 18 19 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. | 9 10 11 12 13 14 15 16 17 18 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. |
| 9 10 11 12 13 14 15 16 17 18 19 20 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. Q. What if it's a female? A. I ask another female nurse. | 9 10 11 12 13 14 15 16 17 18 19 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. THE WITNESS: It depends. |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. Q. What if it's a female? A. I ask another female nurse. Q. Is that standard, to your knowledge, in the | 9 10 11 12 13 14 15 16 17 18 19 20 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. THE WITNESS: It depends. BY MR. SILVESTRI: Q. Give me some examples of why you measure |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. Q. What if it's a female? A. I ask another female nurse. Q. Is that standard, to your knowledge, in the ER practice, of a female catheterizing a female | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. THE WITNESS: It depends. BY MR. SILVESTRI: Q. Give me some examples of why you measure output. I've seen that with family members in the |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. Q. What if it's a female? A. I ask another female nurse. Q. Is that standard, to your knowledge, in the ER practice, of a female catheterizing a female patient? Was that the standard practice in 2008 at | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. THE WITNESS: It depends. BY MR. SILVESTRI: Q. Give me some examples of why you measure output. I've seen that with family members in the hospital. They're always asking how much pee did |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Patient Silvestri needs to have a catheter by the way, does a bladder catheter sometimes have a specific name? Sometimes I see the name Foley catheter. A. Foley catheter is a popular name. Q. And if you are ordered by a doctor to do that, do you do it or do you assign it to somebody else? A. If it's a male, I will go ahead and do it, if it's my patient. Q. What if it's a female? A. I ask another female nurse. Q. Is that standard, to your knowledge, in the ER practice, of a female catheterizing a female | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | the end of the bed, or wherever it might be located. Is a CNA charged with disposing of that urine that's collected in the vessel? A. When instructed by the nurse, yes. Q. Are you supposed to measure the output of the patient? A. Yes. Q. Why do you do that? MR. BEMIS: I object to form. Incomplete hypothetical. THE WITNESS: It depends. BY MR. SILVESTRI: Q. Give me some examples of why you measure output. I've seen that with family members in the |

ESQUIRE

ı.,

tt -}

| | NE DOE vs. VALLEY HEALTH SYSTEM LL | C | 113–116 |
|--|---|--|--|
| | Page 113 | 1 | Page 115 |
| 1 | you're giving a patient a diuretic, meaning a | 1 | |
| 2 | medication to make them urinate, and the patient has | | movement or not? |
| 3 | a catheter, you need to measure and make sure the | 3 | A. It's part of their charting, yes. |
| 4 | medication is working properly and there is urine | 4 | Q. Do you know if that's true also once a |
| 5 | output. | 5 | patient is transferred to a room upstairs? |
| 6 | Q. Regardless of the reason, is it proper to | 6 | A. Yes. |
| 7 | always record the urine output? | 7 | Q. In fact, there's a form that indicates |
| 8 | A. Are we talking about at the ER or upstairs? | 8 | whether a patient has had a bowel movement, correct? |
| 9 | Q. Well, let's deal with the ER. | 9 | A. Yes. |
| 10 | • • | 10 | Q. And I'll be happy to show it to you, if you |
| 11 | | 11 | want. |
| 12 | | 12 | A. I believe you. |
| 13 | | 13 | Q. Who records that in the chart? |
| 14 | | 14 | A. The nurse will chart it. |
| 15 | | 15 | Q. Okay. And let me ask this. |
| 16 | | 16 | If a CNA is instructed by the |
| 17 | i , | 17 | nurse to empty the vessel that holds the urine from a |
| 18 | | 18 | catheter, that CNA will do that, and then provide you |
| 19 | | 19 | with the amount of urine that was in the vessel? |
| 20 | • · | 20 | A. Yes. |
| 21 | catheterized, "Have you used the bathroom," right? | 21 | Q. And then you will chart it? |
| 22 | A. Yes. | 22 | A. Correct. |
| 23 | Q. To your knowledge, is that true for a | 23 | Q. And likewise, if a patient soils him or |
| 24 | patient who has been placed in a room upstairs? Do | 24 | herself with a bowel movement, would you ask the CNA |
| 25 | they measure urine output? | 25 | to clean that up? |
| | Page 114 | | Page 116 |
| 1 | MR. BEMIS: I object to form. | 1 | A. I would ask the CNA to help me clean it up. |
| 2 | MR. MURDOCK: Objection. Speculation. | 2 | Q. What does that mean when you say "help me?" |
| 3 | THE WITNESS: Usually, to my | 3 | It might sound obvious, but tell me what it means |
| 4 | understanding, every shift, at the end of the shift | 4 | when you say you ask the CNA to help you clean it up. |
| 5 | you try to get an intake and output of a patient. | 5 | A. In the ER we work as a team, and usually |
| 6 | BY MR. SILVESTRI: | 6 | somebody that dirtied their gurney it takes two |
| 7 | Q. In fact there's a form that says, "Liquid | 7 | the people to take care of that. |
| 8 | intake, urine output," right? | 8 | Q. Why? |
| 9 | A. Yes. | 9 | A. Because we have to turn the patient from |
| 10 | Q. Something along those lines? | | side to side without hurting our backs. |
| 11 | A. Yes. | 11 | Q. Would that same concern be seen in a room |
| 12 | Q. Is that also true for bowel movements, that | 12 | upstairs? |
| 12 | | 40 | MD DEMIS: Lablact to fairs On about |
| 12 | you want to record whether a patient has had a bowel | 13 | MR. BEMIS: I object to form. Go ahead |
| 13 14 | movement? And let's start with the emergency room. | 14 | and answer, if you can. |
| 13 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. | 14 15 | and answer, if you can. THE WITNESS: Yes. If they're smart. |
| 13 14 15 16 | movement? And let's start with the emergency room.A. Bowel movements, yes, as far as I do that.Q. Well, do you believe that that's common | 14 15 16 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. |
| 13 14 15 16 17 | movement? And let's start with the emergency room.A. Bowel movements, yes, as far as I do that.Q. Well, do you believe that that's common practice amongst your trade with registered nurses? | 14 15 16 17 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: |
| 13 14 15 16 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other | 14 15 16 17 18 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? |
| 13 14 15 16 17 18 19 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. | 14 15 16 17 18 19 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. |
| 13 14 15 16 17 18 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. Q. Have you received any instruction from | 14 15 16 17 18 19 20 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. Q. And let me ask you this. Are there modesty |
| 13 14 15 16 17 18 19 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. Q. Have you received any instruction from Centennial Hills Hospital regarding the recording of | 14 15 16 17 18 19 20 21 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. Q. And let me ask you this. Are there modesty concerns? |
| 13 14 15 16 17 18 19 20 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. Q. Have you received any instruction from | 14 15 16 17 18 19 20 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. Q. And let me ask you this. Are there modesty concerns? For example, if you had a female |
| 13 14 15 16 17 18 19 20 21 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. Q. Have you received any instruction from Centennial Hills Hospital regarding the recording of | 14 15 16 17 18 19 20 21 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. Q. And let me ask you this. Are there modesty concerns? For example, if you had a female patient that had soiled herself with a bowel |
| 13 14 15 16 17 18 19 20 21 22 | movement? And let's start with the emergency room. A. Bowel movements, yes, as far as I do that. Q. Well, do you believe that that's common practice amongst your trade with registered nurses? A. I do that. I'm not sure what the other nurses do. Q. Have you received any instruction from Centennial Hills Hospital regarding the recording of whether a patient has a bowel movement? | 14 15 16 17 18 19 20 21 22 | and answer, if you can. THE WITNESS: Yes. If they're smart. You've got to protect your backs. BY MR. SILVESTRI: Q. What about protecting the patient? A. Yes, so the patient won't fall down. Q. And let me ask you this. Are there modesty concerns? For example, if you had a female |

ESQUIRE

e. -

•

\$~~~\ ______

| JA | NE DOE VS. VALLEY HEALTH SYSTEM LLO | | 11/-12 |
|--|---|--|---|
| | Page 117 | 1 | Page 11 |
| 1 | nurse to assist? | 1 | Q. So if the patient can't move, then you |
| 2 | A. Yes. | 2 | definitely need two people to help turn the patient? |
| 3 | Q. Would you ever go in with two male nurses | 3 | A. Yes. |
| 4 | or a male nurse and a male CNA to clean up a female | 4 | Q. Okay. Keep going. |
| 5 | patient who had soiled herself? | 5 | A. One staff member will help turn, while the |
| 6 | A. The question is, is there another female I | 6 | other staff member will help take the bedpan out and |
| 7 | can find? Or is that the last choice? | 7 | wipe and clean, and maybe change the sheets, if |
| 8 | Q. Let's deal with the first example, there's | 8 | necessary; and then we have to do it over again on |
| 9 | another female. | 9 | the other side. |
| 10 | A. I would ask the female first. | 10 | Q. Now, you mentioned the bedpan. That's |
| 11 | Q. And then otherwise, if there's only two | 11 | assuming the patient has asked you, "I have to go to |
| 12 | males, you would go ahead and do it, because it's | 12 | the bathroom, can you bring me a bedpan," correct |
| 13 | important to clean that patient up? | 13 | A. Yes. |
| 14 | A. Yes. | 14 | Q. What about in the circumstances where a |
| 15 | Q. Would you record that? | 15 | patient didn't give you the warning and soils him or |
| 16 | A. Yes. | 16 | herself in the bed? Tell me about that. |
| 17 | Q. In other words, it would be on the chart | 17 | MR. MURDOCK: Jim, I'm sorry, are we |
| | | 18 | still talking about the ER? |
| 18 | A. Yes. | 19 | MR. SILVESTRI: No, now we're talking |
| 19 | | 20 | about in the bed with one of these pads. |
| 20 | Q. Would you ever send a CNA in by himself to | 20 | MR. MURDOCK: Okay. |
| 21 | do that? | 21 | BY MR. SILVESTRI: |
| 22 | A. To do what? | 1 | |
| 23 | Q. Clean up a bowel movement of a female | 23 | Q. What would you do? |
| 24 | | 24 | MR. MURDOCK: Objection. Speculation. |
| 25 | A. It's going to be hard. I would rather | 25 | Go ahead. |
| | Page 118 | | Page 120 |
| 1 | help. We need help. We help each other, so | 1 | THE WITNESS: Again, I need another |
| 2 | Q. And I apologize for these questions. They | 2 | person to help me. The same thing, turning. |
| 3 | might seem a little mundane to you, but just bear | 3 | BY MR. SILVESTRI: |
| 4 | with me. | 4 | Q. And would you have to turn both sides? |
| 5 | In cleaning up a male or female | 5 | A. You have to adjust the bedpan. |
| 6 | patient that's had a bowel movement typically is | 6 | Q. No, there's no bedpan. |
| 7 | it fair to say that the bed has a pad on it? | 7 | A. Okay. |
| 8 | A. Yes. | 8 | Q. They solled themselves and there's just |
| 9 | Q. Is that true in the ER? | 9 | that bed pad. Tell me what you do then. |
| 10 | A. No. | 10 | A. Turn the patient to one side, and the other |
| 11 | Q. It's not? | 11 | staff member will help clean, replace the sheets, and |
| 12 | A. Not all the time. | 12 | put back another pad; and then will turn to the other |
| 13 | Q. Okay. You've seen though other beds in the | 13 | side and straighten out the sheets. |
| 14 | hospital where they have a pad that is sort of | 14 | Q. And that takes two people? |
| 15 | almost like a big diaper, right? | 15 | A. Yes. |
| 10 | | 16 | Q. And would that be charted? |
| | | | |
| 16 | A. Yes. | { | A. Bowel movements ves |
| 16 17 | Q. It's water-resistant on one side, and a | 17 | A. Bowel movements, yes. |
| 16 17 18 | Q. It's water-resistant on one side, and a little bit softer on the other side? | 17 18 | Q. And so in doing this you've got to bring in |
| 16 17 18 19 | Q. It's water-resistant on one side, and a little bit softer on the other side?A. Yes. | 17 18 19 | Q. And so in doing this you've got to bring in a new pad, correct? |
| 16 17 18 19 20 | Q. It's water-resistant on one side, and alittle bit softer on the other side?A. Yes.Q. And so in cleaning up a patient that has a | 17 18 19 20 | Q. And so in doing this you've got to bring in a new pad, correct?A. Yes. |
| 16 17 18 19 20 21 | Q. It's water-resistant on one side, and a little bit softer on the other side? A. Yes. Q. And so in cleaning up a patient that has a bowel movement, tell me what's required. | 17 18 19 20 21 | Q. And so in doing this you've got to bring in a new pad, correct?A. Yes.Q. Sometimes you've got to bring in new |
| 16 17 18 19 20 21 22 | Q. It's water-resistant on one side, and a little bit softer on the other side? A. Yes. Q. And so in cleaning up a patient that has a bowel movement, tell me what's required. A. First of all, can the patient move or not? | 17 18 19 20 21 22 | Q. And so in doing this you've got to bring in a new pad, correct?A. Yes.Q. Sometimes you've got to bring in new sheets? |
| 16 17 18 19 20 21 22 23 | Q. It's water-resistant on one side, and a little bit softer on the other side? A. Yes. Q. And so in cleaning up a patient that has a bowel movement, tell me what's required. A. First of all, can the patient move or not? If it's a nursing home patient, they will have a hard | 17 18 19 20 21 22 23 | Q. And so in doing this you've got to bring in a new pad, correct? A. Yes. Q. Sometimes you've got to bring in new sheets? A. Yes. Sometimes a new gown. |
| 16 17 18 19 20 21 22 | Q. It's water-resistant on one side, and a little bit softer on the other side? A. Yes. Q. And so in cleaning up a patient that has a bowel movement, tell me what's required. A. First of all, can the patient move or not? If it's a nursing home patient, they will have a hard time moving. So I need another person to help me | 17 18 19 20 21 22 | Q. And so in doing this you've got to bring in a new pad, correct?A. Yes.Q. Sometimes you've got to bring in new sheets? |



esea e

ي. بر سر

| 1 | NE DOE vs. VALLEY HEALTH SYSTEM LL | C | 121–124 |
|--|---|--|---|
| 1 4 | Page 121 | 1 | Page 123 |
| 1 | A. Yes. | 1 | time you've been there have you always been |
| 2 | Q. Like baby wipes? | 2 | instructed that patient safety is a priority? |
| 3 | A. Yes. | 3 | A. Number 1, yes. |
| 4 | Q. Would you glove up to do that? | 4 | Q. Do you know if agency nurses or agency CNAs |
| 5 | A. Absolutely. | 5 | are instructed by Centennial Hills Hospital that |
| 6 | Q. Would there be any charting or recording | 6 | patient safety is the number 1 priority? |
| 7 | anywhere that the patient has received new sheets or | 7 | MR. BEMIS: Lack of foundation. Calls |
| 8 | a new pad, or anything like that? | 8 | for speculation. Answer, if you know. |
| 9 | A. I would chart that in my charting, that the | 9 | THE WITNESS: I hope they would, yeah. |
| 10 | patient is incontinent of stool. | 10 | |
| 11 | Q. Would a CNA ever chart that? | 11 | Q. Perhaps it would be better if I asked |
| 12 | A. They don't chart, as far as in the ER. | 12 | · |
| 13 | Q. Do you know if CNAs chart upstairs? | 13 | |
| 14 | MR. BEMIS: I object to form. | 14 | |
| 15 | THE WITNESS: I don't know officially. | 15 | • |
| 16 | BY MR. SILVESTRI: | 16 | |
| 17 | Q. In your practice as a registered nurse, | 17 | |
| | | 18 | - |
| 18 | have you ever instructed a CNA to do something that | 19 | |
| 19 | is not within Nevada Code? | 1 | - |
| 20 | A. No. | 20 | |
| 21 | MR. MURDOCK: Objection. Assumes facts | 21 | A. I want to say Core Measure. It's always |
| 22 | not in evidence, and lacks foundation. | 22 | |
| 23 | BY MR. SILVESTRI: | 23 | |
| 24 | Q. You said that one of the things that a CNA | 24 | 5 |
| 25 | can do is stock the room with supplies. | 25 | hundred percent of. One of the Core Measures are |
| | Page 122 | | Page 124 |
| 1 | A. Yes. | 1 | preventing pneumonia, so we have to ask patients |
| 2 | Q. If a CNA is going to stock a room with | 2 | whether they've had pneumonia vaccines or not, during |
| 3 | supplies, would you expect the CNA to still knock | 3 | that season. |
| 4 | before entering? | 4 | THE WITNESS: Excuse me, I think I need |
| 5 | A. Yes. | 5 | a break, because I need to put more money on my |
| 6 | Q. Because of the reasons that we've stated | 6 | parking. |
| | before, modesty and privacy? | | |
| 7 | | 7 | MR. SILVESTRI: I have like one more |
| 7 8 | A. Privacy and modesty. | 8 | question. I'm happy to break now. I don't want you |
| | A. Privacy and modesty.Q. Would you expect a CNA who is stocking a | 8 9 | question. I'm happy to break now. I don't want you to get a ticket. |
| 8 | A. Privacy and modesty. | 8 9 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. |
| 8 9 | A. Privacy and modesty.Q. Would you expect a CNA who is stocking a | 8 9 10 11 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: |
| 8 9 10 | A. Privacy and modesty.Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or | 8 9 10 11 12 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, |
| 8 9 10 11 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before | 8 9 10 11 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? |
| 8 9 10 11 12 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? | 8 9 10 11 12 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. |
| 8 9 10 11 12 13 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: object to form. | 8 9 10 11 12 13 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about |
| 8 9 10 11 12 13 14 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. | 8 9 10 11 12 13 14 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. |
| 8 9 10 11 12 13 14 15 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we | 8 9 10 11 12 13 14 15 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit |
| 8 9 10 11 12 13 14 15 16 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or | 8 9 10 11 12 13 14 15 16 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them |
| 8 9 10 11 12 13 14 15 16 17 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. | 8 9 10 11 12 13 14 15 16 17 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit |
| 8 9 10 11 12 13 14 15 16 17 18 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. | 8 9 10 11 12 13 14 15 16 17 18 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. THE WITNESS: Again, they'll need help. | 8 9 10 11 12 13 14 15 16 17 18 19 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. Was it your impression that |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. THE WITNESS: Again, they'll need help. We work as a team. BY MR. SILVESTRI: | 8 9 10 11 12 13 14 15 16 17 18 19 20 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. Was it your impression that Mr. Farmer was overly attentive to female patients? |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. THE WITNESS: Again, they'll need help. We work as a team. BY MR. SILVESTRI: Q. So they would have to come and report to | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. Was it your impression that Mr. Farmer was overly attentive to female patients? A. No. I never got that impression during that time. |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. THE WITNESS: Again, they'll need help. We work as a team. BY MR. SILVESTRI: Q. So they would have to come and report to you? | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. Was it your impression that Mr. Farmer was overly attentive to female patients? A. No. I never got that impression during that time. Q. Okay. The fact that Ms. Wolfe asked you to |
| 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | A. Privacy and modesty. Q. Would you expect a CNA who is stocking a room and who sees that a patient has soiled him or herself, to take care of that problem before reporting it to the nurse? MR. BEMIS: I object to form. Speculation. MR. MURDOCK: Objection. Are we talking about in the ER or MR. SILVESTRI: Anywhere. MR. MURDOCK: Oh, okay. Speculation. THE WITNESS: Again, they'll need help. We work as a team. BY MR. SILVESTRI: Q. So they would have to come and report to | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | question. I'm happy to break now. I don't want you to get a ticket. THE WITNESS: Go ahead. BY MR. SILVESTRI: Q. Do you have the statement in front of you, Exhibit 1? A. Yeah. Q. Page 8. You were asked questions about specific conversations, and whether you recalled them or not. Let me ask this question a little bit differently. Was it your impression that Mr. Farmer was overly attentive to female patients? A. No. I never got that impression during that time. Q. Okay. The fact that Ms. Wolfe asked you to talk to him did you look at her like she was |

ESQUIRE

| 2 the patients. 3 that privacy is 4 remind. 5 Q. Do you 6 superiors at C 7 doing somethine 8 to female patienes 9 A. No. 10 Q. This patienes 11 "He was very 12 and very anxi 13 disconnect the 14 Interpretation | art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 1 2 3 | Page 127 Q. Was that the same for 2008? A. No, they're not allowed. Q. They were not allowed to do that in 2008, is that correct? A. They can help the nurse, again, with instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
|---|--|--|---|
| 2 the patients. 3 that privacy is 4 remind. 5 Q. Do you 6 superiors at C 7 doing somethine 8 to female patienes 9 A. No. 10 Q. This pathatic privacy is and very anxis 13 disconnect the second second | Sometimes we have to remind our staff important. Even nurses we have to a recall ever reporting to any of your entennial Hills that Mr. Farmer was ing inappropriate or was overly attentive ents? Part of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 2 3 4 5 6 7 8 9 10 | A. No, they're not allowed. Q. They were not allowed to do that in 2008, is that correct? A. They can help the nurse, again, with instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 3 that privacy is 4 remind. 5 Q. Do you 6 superiors at C 7 doing somethine 8 to female patienes 9 A. No. 10 Q. This patienes 11 "He was very 12 and very anxis 13 disconnect the 14 International patienes 15 If we're talking 16 have asked a | important. Even nurses we have to u recall ever reporting to any of your entennial Hills that Mr. Farmer was ing inappropriate or was overly attentive ents? wart of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 3 4 5 6 7 8 9 10 | Q. They were not allowed to do that in 2008, is that correct? A. They can help the nurse, again, with instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 4 remind. 5 Q. Do you 6 superiors at C 7 doing somethi 8 to female patie 9 A. No. 10 Q. This p 11 "He was very 12 and very anxi 13 disconnect th 14 In 15 If we're talking 16 have asked a | u recall ever reporting to any of your entennial Hills that Mr. Farmer was ing inappropriate or was overly attentive ents? art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 4 5 6 7 8 9 | is that correct? A. They can help the nurse, again, with instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 5 Q. Do you 6 superiors at C 7 doing somethi 8 to female patie 9 A. No. 10 Q. This p 11 "He was very 12 and very anxi 13 disconnect th 14 I 15 If we're talking 16 have asked a | entennial Hills that Mr. Farmer was ing inappropriate or was overly attentive ents? art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 5 6 7 8 9 10 | A. They can help the nurse, again, with instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 6 superiors at C 7 doing something 8 to female patient 9 A. No. 10 Q. This patient 11 "He was very 12 and very anxies 13 disconnect the 14 Int 15 If we're talking 16 have asked at | entennial Hills that Mr. Farmer was ing inappropriate or was overly attentive ents? art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 6 7 8 9 10 | instruction. Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 7 doing something 8 to female patient 9 A. No. 10 Q. This patient 11 "He was very 12 and very anxing 13 disconnect the 14 Indication 15 If we're talking 16 have asked and | ing inappropriate or was overly attentive ents? Part of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 7 8 9 10 | Q. That's not my question. I'm just being very particular here. In 2008 were CNAs allowed to, |
| 8 to female patie 9 A. No. 10 Q. This p 11 "He was very 12 and very anxi 13 disconnect th 14 I 15 If we're talking 16 have asked a | ents? art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 8 9 10 | very particular here. In 2008 were CNAs allowed to, |
| 9 A. No. 10 Q. This p 11 "He was very 12 and very anxi 13 disconnect th 14 I 15 If we're talking 16 have asked a | art of the statement says in part, overly attentive with female patients ous to connect them to monitors and | 9 10 | In 2008 were CNAs allowed to, |
| 10Q. This p11"He was very12and very anxi13disconnect th14115If we're talking16have asked a | overly attentive with female patients ous to connect them to monitors and | 10 | |
| 11 "He was very 12 and very anxi 13 disconnect th 14 I 15 If we're talking 16 have asked a | overly attentive with female patients ous to connect them to monitors and | | |
| 12and very anxi13disconnect th14115If we're talking16have asked a | ous to connect them to monitors and | 1 1 1 | under their own supervision and at their own direction, attach a heart monitor to a patient? |
| 13disconnect th14115If we're talking16have asked a | | | - |
| 14 I 15 If we're talking 16 have asked a | Construction of the second sec | 12 | A. No. |
| 15 If we're talkin 16 have asked a | | 13 | Q. Male or female, correct? |
| 16 have asked a | want to make sure I understand. | 14 | A. Correct. |
| | g about a heart monitor, would you | 15 | MR. SILVESTRI: Mr. Sumera, I |
| 1 / Temale nation | CNA to attach a heart monitor to a | 16 | appreciate your answers. Thank you. |
| - | | 17 18 | MS. HUETH: I don't have any questions. |
| - | s the patient there, first of all? | | (Recess.) |
| • | ent require a heart monitor or not? | 19 | FURTHER EXAMINATION |
| | assume that they do. | 20 21 | BY MR. MURDOCK: |
| | d just probably put that on myself. | 22 | Q. Mr. Sumera, I'm a little confused about |
| - | ou seen CNAs attach heart monitors to ts in the emergency room before? | 22 | something. Were you the charge nurse on May 15th? |
| | times we do. If we need that patient | 24 | A. I don't know whether I was in charge or |
| | | 25 | not on what specific day. I don't know. |
| 25 really fast, the | | 20 | |
| 1 O Wall 1 | Page 126 vhen you say "help us," does that | 1 | Page 128 Q. And just so I'm clear, Ms. Wolfe came to |
| | bdy else is present? | 1 | you and told you that Mr. Farmer had been putting |
| | s far as a staff nurse, CNA, tech. | 3 | heart monitor leads on all the female patients, |
| | they ever do it alone with the door | 4 | right? |
| 5 closed? | | 5 | MR. BEMIS: 1 object to form. |
| 6 A. No. | | 6 | Misstates testimony. |
| | they be allowed to do it alone with | 7 | THE WITNESS: I don't remember her |
| 8 the door close | | 8 | saying that to me. |
| 9 A. Probat | | 9 | BY MR. MURDOCK: |
| | t they be allowed to do it alone with | 10 | Q. Okay. So what did she say to you? |
| 11 the curtains c | - | 11 | A. The exact conversation I don't remember, |
| 12 A. Proba | | 12 | but I believe it's just to respect the privacy of the |
| | rould a CNA be allowed to attach a | 13 | patient. Again, to knock first. |
| | without receiving instruction to do so | 14 | Q. Well, she said that Mr. Farmer was not |
| | ge nurse or an RN? | 15 | respecting the privacy. Is that what she said? |
| 16 A. They'r | e not allowed. | 16 | A. Again, I don't know what exactly Margaret |
| | can't take that into their own hands | 17 | Wolfe told me, but I did tell Mr. Farmer again to |
| 18 and say, "He | y, I'm going to attach a heart monitor to | 18 | knock first, make sure to ask the nurse whether they |
| 19 you?" | | 19 | need a heart monitor, to ask the nurse whether they |
| | , that's needlessly doing something | 20 | need to be gowned up. |
| 21 that's not nee | ded, so | 21 | Q. Now, you said that he needed to ask the |
| 22 Q. Even | if it was needed, if they weren't | 22 | nurse if the patient needed a heart monitor, right? |
| 23 instructed to | do it, is a CNA authorized to do that | 23 | A. Correct. |
| | Hille Hospital? | 24 | Q. Well, why would he have to ask the nurse if |
| 24 at Centennial | nilis nospital? | 25 | - well, did CNAs put the heart monitors on? |



. معنانی

| | NE DOE vs. VALLEY HEALTH SYSTEM LLC | , | 129-132 |
|--|---|--|---|
| | Page 129 | | Page 131 |
| 1 | A. With the presence of the nurse and with | 1 | patients, and that's why you actually had to have |
| 2 | instructions. | 2 | this conversation with Steven afterwards? |
| 3 | Q. Well, if the nurse is there, why would he | 3 | MR. BEMIS: I object to form. |
| 4 | have to ask the nurse if the patient needed a heart | 4 | THE WITNESS: I don't think so. |
| 5 | monitor? | 5 | BY MR. MURDOCK: |
| | A. Sometimes the nurse is preoccupied with | 6 | Q. You just don't remember the conversation, |
| 6 | starting an IV, getting blood tests. Again, it's | 7 | right? |
| 7 | - | 8 | A. I don't remember the conversation. |
| 8 | like a team. | | Q. So it's possible you did have a |
| 9 | Q. Okay. | 9 | conversation with her about Steven being overly |
| 10 | A. The CNA has to be instructed by the RN. | 10 | |
| 11 | Q. So Ms. Wolfe came to you and told you that | 11 | attentive with female patients, right? |
| 12 | Steven wasn't respecting the privacy, right? | 12 | A. I don't know for sure. |
| 13 | A. That's my perception. | 13 | Q. But it's possible, right? |
| 14 | Q. Okay. So why all of a sudden did heart | 14 | MR. BEMIS: I object to form. |
| 15 | monitors come into this? | 15 | Misstates testimony. |
| 16 | A. I don't know. | 16 | THE WITNESS: I don't know. |
| | Q. Well, you said it though. You said you | 17 | BY MR. MURDOCK: |
| 17 | told Mr. Farmer to ask the nurse whether or not the | 18 | Q. What don't you know? |
| 18 | | 19 | A. As far as the conversation. |
| 19 | patient needed a heart monitor. | 20 | Q. What are you talking about? |
| 20 | So if she's only asking you about | | A. What are you asking me now? |
| 21 | privacy, or telling you that Steven needed to respect | 21 | |
| 22 | their privacy, why did you all of a sudden warn him | 22 | Q. What I'm asking you is, is it possible you |
| 23 | about heart monitors? | 23 | had a conversation with Ms. Wolfe before May 14 or |
| 24 | A. That's the standard thing. Heart monitors, | 24 | May 15 before then, about Steven being overly |
| 25 | gown, and knocking on the door. | 25 | attentive, and that's why she came to you with a |
| | Page 130 | | Page 132 |
| | | | problem with Steven. Wouldn't that make sense at |
| - 1 | O No no She fold Voll Steven was not | 1 | proplem with Steven. Wouldn't that make sense at |
| 1 | Q. No, no. She told you Steven was not | 1 | • |
| 2 | respecting the privacy, right? | 2 | least? |
| 2 3 | respecting the privacy, right? A. I don't remember exactly what she told me. | 2 3 | least? MR. BEMIS: I object to form. Calls |
| 2 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting | 2 3 4 | MR. BEMIS: I object to form. Calls for speculation. |
| 2 3 | respecting the privacy, right?A. I don't remember exactly what she told me.Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? | 2 3 4 5 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to |
| 2 3 4 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. | 2 3 4 5 6 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. |
| 2 3 4 5 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly | 2 3 4 5 6 7 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: |
| 2 3 4 5 6 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? | 2 3 4 5 6 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not |
| 2 3 4 5 6 7 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly | 2 3 4 5 6 7 8 9 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you |
| 2 3 4 5 6 7 8 9 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact | 2 3 4 5 6 7 8 9 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Steven |
| 2 3 4 5 6 7 8 9 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. | 2 3 4 5 6 7 8 9 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you |
| 2 3 4 5 6 7 8 9 10 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't | 2 3 4 5 6 7 8 9 10 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Steven being overly attentive. Am I correct? |
| 2 3 4 5 6 7 8 9 10 11 12 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? | 2 3 4 5 6 7 8 9 10 11 12 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. |
| 2 3 4 5 6 7 8 9 10 11 12 13 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the | 2 3 4 5 6 7 8 9 10 11 12 13 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the | 2 3 4 5 6 7 8 9 10 11 12 13 14 | Ieast? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 6 17 18 19 20 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: Q. Why wouldn't she just do this on her own? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | Ieast? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? MR. BEMIS: Same objection. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 6 17 18 19 20 21 22 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: Q. Why wouldn't she just do this on her own? A. I don't know. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Stever being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? MR. BEMIS: Same objection. THE WITNESS: I don't know how to |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: Q. Why wouldn't she just do this on her own? A. I don't know. Q. Wouldn't it make sense that she came to you | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Steven being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? MR. BEMIS: Same objection. THE WITNESS: I don't know how to answer that. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 6 17 18 19 20 21 22 23 24 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: Q. Why wouldn't she just do this on her own? A. I don't know. Q. Wouldn't it make sense that she came to you | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Steven being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? MR. BEMIS: Same objection. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 21 22 23 | respecting the privacy, right? A. I don't remember exactly what she told me. Q. Did she tell you that Steven was putting heart monitors on every female patient in the world? A. I don't remember that. Q. Was she telling you that Steven was overly attentive with female patients? A. I don't remember as far as the exact conversation. Q. Why would she come to you? Why wouldn't she just do this on her own? A. Again, to remind Steve to respect the privacy. Q. But why would she come to you? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know. I don't know why she came to me. BY MR. MURDOCK: Q. Why wouldn't she just do this on her own? A. I don't know. Q. Wouldn't it make sense that she came to you | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | least? MR. BEMIS: I object to form. Calls for speculation. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: Q. You just don't remember whether or not there was a conversation that took place between you and Ms. Wolfe prior to May 14, 2008 regarding Steven being overly attentive. Am I correct? MR. BEMIS: Same objection. THE WITNESS: I don't remember, again, the conversation between Margaret and myself concerning that. BY MR. MURDOCK: Q. You don't recall? A. I don't recall. Q. But it's possible that conversation did occur, correct? MR. BEMIS: Same objection. THE WITNESS: I don't know how to answer that. BY MR. MURDOCK: |

ESQUIRE

فبودي

(مربع

| 1 deposition today under cath and stating, "No, finat 1 A. I don't receall it. 2 conversation absolutely did not occur," correct? 3 O. Kay. So it didn't happen. It didn't 4. I don't recall it. 3 O. Ckay. So it didn't happen. It didn't 4. I don't recall it. 4. happen, or you just don't remember it? There's a 3 7 M. Silvestri's questions, that you never got the 6 A. I don't recall, again, the conversation. 6 M. Silvestri asked you whether or 0. Ckay. So it's possible you did have the 7 A. Youre asking my perception, correct? 9 A. It's possible, or it never happened. 9 M. Silvestri asked you whether or 10 A. Boy us don't remember way to avait asked you whether or 1 Mr. Silvestri asked you whether or 10 A. It's possible you understand why? 1 A. It's possible you understand why? 3 A. Yes. 2 M. Yes was any you said on't remember? 9 A. It's possible you understand why? 1 O. You dolf, In have no perception as far as 10 A. Boy and you said. 10 3 A. What did not occur? 4 A. Mon't remember it's member it's possible was unotell was themember 11 | JAr | NE DOE vs. VALLEY HEALTH SYSTEM LLC | <i>.</i> | 133–136 |
|---|-----|---|----------|--|
| 2 conversation absolutely did not occur, "correct? 2 that. 3 You're just saying, "I don't recall it?" 3 4 A I don't recail it?" 3 5 Q. Okay, Now, you stated, regarding one of thr. Silvestri squestions, that Steven was overly attentive to 5 females, right? 3 6 M. Silvestri's questions, that you never got the 1 fmr. Silvestri saked you whether or not you got the impression that Steven was overly attentive, and you said, "No, I never got that 5 impression." 7 7 w. Write is and you said, "No, I never got that 5 impression." 7 A. Go, New, So it spossible that you had the 15 conversation, you just don't remember it? 10. You just don't remember? 8 A. In 2008, no, I have no perception as far as 5 overly attentive. 7 A. Correct. 9 A. No, It's not my impression that the was 5 overly attentive. 7 A. Idon't fink so. 9 A. Un 2008, no, I have no perception as far as 5 overly attentive. 7 A. BEMIS: I object to form. 1 A. No, It's not my impression that that the spenend? 9 A. I don't fink so. 9 1 A. No, It's not my impression that that at say ou sit here today. 9 A. I don't fink so. 9 1 A. Un-thuk. A. Uh-huh. 1 A. I don't fink so. 9 1 A. No, It's not my impression that that a discussion. 2 WR MR. MURDOCK: 2 | | | , , | Page 135 |
| 3 You're just saying, "I don't recall it?" 3 Q. Okay. So it didn't happen. It didn't 4 A. I fon't recall it. 4 happen, or you just don't remember it? There's a 5 Mr. Silvestif's questions, that you never got the 6 A. I don't recall, again, the conversation. 6 Mr. Silvestif asked you whether or 7 A. I don't recall. 9 A. I don't recall. 1 Mr. Silvestif asked you whether or 7 A. I happen. It didn't happen. It didn't happen. 2 Mr. Silvestif asked you whether or 7 A. I don't recall. 10 Again, I don't recall. 1 Mr. Silvestif asked you whether or 7 A. I don't remember. 11 Q. Well, those are two completely different 1 Mr. Silvestif asked you whether or 7 A. Yes. 14 A. Orect. 3 A. Okoga, so I talking about today as you 7 A. A for the possible you told Ms. Wolfe that 18 Mr. Farmer was being overly attentive with female 3 A. What did not cocur? 2 A. If a possible you told Ms. Wolfe that 18 Mr. Farmer was being overly attentive with female 3 A. On't remember with thappened. 1 A. I don't tremember | | | | - |
| 4 A. 1 don't recall it. 4 happen, or you just don't remember it, right? 5 G. Okay, Now, you stated, regarding one of Mr. Silvestris questions, that you never got the firmerss in right? 5 difference. You understand that, right? 6 M. Vou're asking my perception, correct? 6 A. 1 don't recall. 7 7 A. You're asking my perception, correct? 9 A. 1's possible you did have the conversation? 9 A. Why it perception that Steven was overly attentive, and you got the impression that Steven was overly attentive, and you got the impression that Steven was overly attentive, and you got don't remember? 1 Q. Weil, it yoes are two completely different 1 Mr. Silvestri asked you whether or not you got the impression that Steven was overly attentive, and you got there be a different answer back in 2008, no, I have no perception as far as 0 1 Q. Okay. So it's possible that you had the 15 1 D. 2008, no, I have no perception as far as 0 1 Mr. Earmer was being overly attentive with female 2 A. In 2008, no, I have no perception as far as 0 1 Mr. BEMS: I object to form. 2 Currest. 1 Mr. BREMS: I object to form. 2 Currest. 1 Mr. BREMS: I object to form. 2 Q. That you had an impression that the was 2 | | - | | |
| G. Okay. Now, you stated, regarding one of Mr. Silvestri's questions, that you never got the Impression that Steven was overly attentive. A. You're asking my perception, correct? A. You're asking my perception as far as O. You just don't remember? A. No, it's not my impression that that A. You don't think so. So l guess Ms. Wolfe A. You don't think so so l guess Ms. Wolfe A. You don't think so so l guess Ms. Wolfe A. You don't member, we just had a discussion A. Which never happened at C. You don't member, we just had a discussion A. Wolfe, and you adiscused his being overly A. Wolfe, and you adiscused his being overly A. Wolfe and you adiscused his being overly A. Wolfe and you adiscused his being overly A. What I remember is Margaret told meto A. Wolfe? A. Wolfe? | 3 | | | |
| Mr. Silvestr's questions, that you never got the 7 impression that Steven was overly attentive to 8 females, right? 6 A. I don't recall, again, the conversation. Mr. Silvestri asked you whether or 9 A. You're asking my perception, correct? 9 A. If's possible, or it never happened. 1 Mr. Silvestri asked you whether or 9 not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 9 impression." 1 Q. Well, those are two completely different 10. You just don't recall. 2 more you taiking about today as you 7 sit here, or could there be a different answer back 1 in 2008, no, I have no perception as far as 9 suspicion or anything. 0. A lidn't recall. 1 Q. Okay. Soi I's possible toy uo tid Ms. Wolfe that 18 Mr. Farmer was being overly attentive with female 19 patients before May 14, 2008, you just don't remember 20 it. Is that correct? 1 A. No, it's not my impression that that 12 happened. 1 A. I don't think so. 20 conversation. 2 A. Uhch never happened? 2 A. I don't think so. 20 conversation. Page 138 20 conversation. 1 A. No, it's not my impression that that 2 happened. 1 A. I don't think so. 20 So it never happened? 1 3 A. What did not occur? 2 Q. You don't think so. 20 Out that's as you sit here today. 1 A. I don't know. 4 A. I don't never happened? 3. A. Uchn'think so. 3 conversation with M. Son's any ung mightidin't happen. 1 <t< td=""><td>4</td><td></td><td>4</td><td></td></t<> | 4 | | 4 | |
| 7 Q. Sol'ts possible you did have the 8 conversation? 9 A. You're asking my perception, correct? 0 Q. Well, I just emember what you answered to 1 Mr. Silvestri 2 Mr. Silvestri asked you whether or 3 A. You're asking my perception, correct? 1 Mr. Silvestri asked you whether or 3 A. You's asking my perception as far as 6 Are you talking about today as you 7 A. 10008, nou have no perception as far as 9 A. In 2008, no, I have no perception as far as 9 A. What did not occur? 3 A. What did not occur? 4 A. No, it's not my impression that thet 5 overly attentive. 7 A. What did not occur? 4 A. No, it's not my impression that that 1 Page 134 1 A. I don't know why she would say things. I 5 O. But that's as you sit here today. 6 A. Which never happened, right? 7 A. Which never happened, with? 9 Q. But that's as you sit here today. 9 | 5 | Q. Okay. Now, you stated, regarding one of | 5 | |
| a females, right? 8 conversation? 9 A. It's possible, or it never happened. 9 A. You're asking my perception, correct? 9 A. It's possible, or it never happened. 1 Mr. Silvestri asked you whether or 3 not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 1 impression." 10 Again, I don't recall. 1 Mr. Silvestri asked you whether or 3 not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 1 impression." 10 Q. Wall, those are two completely different 10 Q. Wall, those are two completely different 11 Q. Wall, those are two completely different 12 11 Q. Wall, those are two completely different 13 A. Yes. 1 A. In 2008, no, I have no perception as far as 5 suspicion or anything. 1 A. Correct. 10 A. Correct. 1 Q. You just don't remember, or that did not 2 occur? 21 MR. BEMIS: I object to form. 22 1 A. No, it's not my impression that that 2 happened. 1 A. I don't think so. 1 Page 138 1 A. I don't transember him being too attentive, 3 attentive. That did not occur? 4 1 A. I don't think so. 1 3 2 We | 6 | Mr. Silvestri's questions, that you never got the | 6 | |
| A. You're asking my perception, correct? Q. Well, ligust remember what you answered to Mr. Silvestri. asked you whether or a not you got the impression that Steven was overly attentive, and you said, "No, I never got that G. You understand why? A. Yas. Q. Okay. So it's possible that you had the conversation, you just don't remember it, correct? A. You's possible that you had the there, or could there be a different answer back. M. DOS, no, I have no perception as far as O. You just don't remember, or that did not occur? A. What id not occur? A. No, it's not my impression that that happened. Q. So it never happened, right? A. No, it's not my impression that that sa far as - Q. But that's as you sit here today. Q. But that's as you sit here today. Q. But that's as you sit here today. Q. But you remember, we just had a discussion tatitutive, and you said, "ton't remember.". Q. But you remember, we just had a discussion tatitutive, and you said, "ton't remember.". Q. But you remember, we just had a discussion tatitutive, and you said, a ton't remember.". Q. But you remember, we just had a discussion tatitutive, and you said, stort remember.". Q. But you remember, we just had a discussion tatitutive, and you said, a ton't remember.". Q. Well, before Mr. Silvestri asked you separing it didn't moding a good job. Q. U know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 14, 02008. Q. I know. f'm talking about before May 1 | 7 | impression that Steven was overly attentive to | 7 | |
| Q. Well, I just remember what you answered to 1 Mr. Silvestri. Mr. Silvestri asked you whether or 3 not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 1 Impression." A. Yes. Q. Okay. So it's possible that you had the 1 conversation, you just don't remember? A. In 2008, no, I have no perception as far as 0 suspicion or anything. A. In 2008, no, I have no perception as far as 0 suspicion or anything. A. Mhat did not occur? A. What did not cocur? A. No, it's not my impression that that 2 happened. A. Which never happened? G. That you believe that he was overly 3 ttentive. Page 136 A. I don't remember fim being too attentive, 3 as ar as - Q. But that's as you sith here today. Q. But that's as you sith have had with 3 Ms. Wolfe, and you discussed his being overly 4 attentive, and that would have been before May 14, 2008, and you said, "I don't remember." You don't timk so. So I guess Ms. Wolfe Is lying, and lied to the police, is that correct? A. I don't remember, we just had a discussion 4 bout a conversation you might have had with 3 Ms. Wolfe, and you discussed his being overly 4 attentive, and that would have been before May 14, 2008, and you said, "I don't remember." You do recall that, right? A. What I remember is Margaret told me to speak to Steve Farmer. Q. Nuch That Iremember is Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just A. He told you you were doing a good job. But he did tell you anything dise? A. Yes. A. Yes. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patentins, and didn't you just <l< td=""><td>8</td><td>females, right?</td><td>8</td><td></td></l<> | 8 | females, right? | 8 | |
| 1 Mr. Silvestri. 2 Mr. Silvestri asked you whether or not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 5 impression." 11 Q. Well, those are two completely different 12 things. Do you understand why? 3 A. Yes. Q. Okay. So it's possible had you had the 15 conversation, you just don't remember it, correct? 4 A. Oract. Q. Okay. So it's possible you told Ms. Wolfe that 16 conversation goverly attentive with female 17 Q. You just don't remember? 9 A. In 2008, no, I have no perception as far as 0 suspicion or anything. 11 Mr. EEMS: I object to form. 2 Occur? 14. K. BCMS: I object to form. 2 Yes. 14. I don't remember the 20 it. Is that correct? 4 A. What did not occur? 2 4 A. No, it's not my impression that that 14 4. I don't think so. 2 Q. That you believe that he was overly 3 attentive. That did not occur? 2 4 A. I don't temember him being too attentive, 34 as ra as - 34 abut a conversation you might have had with 35 (2008, and you alight and this got with set as you with there had with 35 (2008, and you alight in the weak with 36 (2008, and you alight in the weak werly 37 A. What I remember, we just had a discussion 37 A. What I remember is Margaret told me to 37 A. What I remember. 14 A. I don't tanswer for her. 38 (2008, and you alight apke had wit | 9 | A. You're asking my perception, correct? | 9 | It's possible, or it never happened. |
| 2 Mr. Silvestri asked you whether or 3 not you got the impression that Steven was overly 4 attentive, and you said, "No, I never got that 5 impression." 12 things. Do you understand why? 3 A. Yes. 4 Colvay. So it's possible that you had the 5 conversation, you just don't remember it, correct? 6 Are you talking about today as you 3 it here, or could there be a different answer back 6 in 2008, you just don't remember? 6 9 A. In 2008, no, I have no perception as far as 5 usepicion or anything. 10 A. M 2008, you just don't remember it 9 patientis before May 14, 2008, you just don't remember 10 20 1 Q. You just don't remember, or that did not 0 cour? 21 MR. BEMIS: 1 object to form. 2 Coury attentive. 20 It is that correct? 4 Q. That you had an impression that that 2 happened. 20 But It's possible it did occur, correct? 7 A. Which never happened, right? 3 A. Which never happened, right? 5 Q. That you believe that he was overly 3 3 A. Udon't tremember, we just had a discussion 3 6 Q. Weil, did she lie? A. I don't tremember. New you're 3 a far as - 4 1 A. I don't think so. 5 9 7 A. Ubrhuh. 3 Con'that's as you sit here tod | 10 | Q. Well, I just remember what you answered to | 10 | - |
| 3 not you got the impression that Steven was overly 13 Â. Yes. 4 attentive, and you said, "No, I never got that 14 Q. Okay. So it's possible that you had the 5 impression." Q. Okay. So it's possible that you had the 14 6 Are you talking about today as you 16 A. Correct. 17 7 A. ho 2008, you just don't remember? 16 A. Correct. 17 9 A. In 2008, no, I have no perception as far as 18 Mr. Fermer was being overly attentive with female 9 A. What did not occur? 20 Yes. 18 MR. BURDOCK: 20 Curb at you had an impression that the was 21 MR. MURDOCK: 22 21 A. No, it's not my impression that thet 20 Q. You don't think so. 19 Page 138 1 A. No, it's not my impression that that 20 Q. You don't think so. 19 Page 138 1 A. No, it's not my impression that that 20 Q. You don't think so. 19 Q. That you believe that he was overly 3 Q. So it never happened, right? 3 A. I don't remember is Margaret today. Q. Well, did she lie? | 11 | Mr. Silvestri. | | |
| 4 attentive, and you said, "No, I never got that 5 impression." 4 attentive, and you said, "No, I never got that 5 impression." 6 Are you talking about today as you 7 sithere, or could there be a different answer back 8 in 2008, you just don't remember? 9 A. In 2008, no, I have no perception as far as 0 cour? 2 A. What did not occur? 3 A. What did not occur? 4 Q. That you had an impression that the was 5 overly attentive. 7 A. No, it's not my impression that that 1 happened. 2 Q. So it never happened, right? 4 A. Which never happened? 5 A. I don't tremember him being too attentive, 3 as far as - 9 Q. But that's as you sit here today. 0 A. Un-huh. 1 A. Hon't tromember im being too attentive, about a conversation you might have had with 3 M. Wolfe, and you discussed his being overly 3 attentive, as far as - 9 Q. I knew. I'm talking about before May 14, 9 Q. I knew. I'm talking about before May 14, 9 Q. I knew. I'm talking about before May 14, 10 don't tall you anything else? 12 A. Hon't memember is Margaret Wolfe ha | 12 | Mr. Silvestri asked you whether or | 12 | |
| 5 impression." 15 conversation, you just don't remember it, correct? 6 Are you talking about today as you 16 Are you talking about today as you 7 A. In 2008, no, I have no perception as far as 17 Q. And it's possible you told Ms. Wolfe that 8 in 2008, no, I have no perception as far as 19 patients before May 14, 2008, you just don't remember 9 A. In 2008, no, I have no perception as far as 19 patients before May 14, 2008, you just don't remember 10 You just don't remember? 11 Mr. Farmer was being overly attentive with female 11 Q. You just don't remember? 11 MR. BEMIS: I object to form. 20 You just don't remember hemession that the was 20 It is that correct? 12 A. No, it's not my impression that that 1 A. I don't think so. 20 21 A. I don't nemember him being too attentive, 2 Q. You don't think so. 19 20 23 G. But you remember, we just had a discussion 14 A. I don't now why she would say things. I 5 32 A. Uh-huh. 11 So explain to me what happened at 12 14 A. No. I had to pay my park | 13 | not you got the impression that Steven was overly | 13 | A. Yes. |
| 5 impression." 15 conversation, you just don't remember it, correct? 6 Are you talking about today as you A. Gorrect. 7 A. In 2008, you just don't remember? 16 A. Correct. 9 A. In 2008, no, I have no perception as far as 19 patients before May 14, 2008, you just don't remember 9 A. What did not occur? 20 It is that correct? 10 Q. You just don't remember, or that did not 22 THE WITNESS: I don't remember the 20 Correct. 23 conversation. 22 11 A. What did not occur? 23 conversation. 24 21 M. BEMIS: I object to form. 22 conversation. 23 3 A. What did not occur? 24 BY MR. MURDOCK: 25 Q. But it's possible it did occur, correct? 3 A. No, it's not my impression that that 1 A. I don't think so. S liges Ms. Wolfe 3 G. So it never happened, right? 4 A. I don't thone so. So I guess Ms. Wolfe 3 G. That you believe that he was overly 5 don't think so. 1 don't know. thy she would say things. I 5 | 14 | | 14 | Q. Okay. So it's possible that you had the |
| 6 Are you talking about today as you 16 A. Correct. 7 sit here, or could there be a different answer back 17 Q. Correct. 8 in 2008, you just don't remember? 18 Mr. Farmer was being overly attentive with female 9 A. In 2008, no, I have no perception as far as 18 Mr. Farmer was being overly attentive with female 9 A. Un you just don't remember, or that did not 20 i. Is that correct? 1 Q. You just don't remember, or that did not 21 MR. BMIS: I object to form. 2 THE WITNESS: I don't remember the 23 conversation. 4 Q. That you had an impression that he was 25 overly attentive. 25 7 A. No, it's not my impression that that 24 BY MR. MURDOCK: 25 2 D. So it never happened, right? 3 A. I don't think so. Page 136 6 Q. That you believe that he was overly 3 a I don't think so. Page 136 7 A. I don't remember, we just had a discussion 1 S don't know. 6 Q. Well, did she lie? 7 A. I don't remember, we just had a discussion 2 Q. Well, b | 15 | | 15 | conversation, you just don't remember it, correct? |
| 7 sit here, or could there be a different answer back 17 Q. And it's possible you told Ms. Wolfe that 8 in 2008, you just don't remember? 18 Mr. Farmer was being overly attentive with female 9 A. In 2008, no. I have no perception as far as 19 patients before May 14, 2008, you just don't remember 1 Q. You just don't remember, or that did not 20 2 A. What did not occur? 21 MR. BEMIS: I object to form. 2 Q. That you had an impression that he was 25 Q. But it's possible it did occur, correct? 1 A. No, it's not my impression that that 2 Q. You don't think so. Page 136 2 Q. That you believe that he was overly 3 I A. I don't think so. Page 136 3 Q. So it never happened, right? 4 A. I don't know. 1 A. I don't think so. Page 136 4 A. Uon't remember him being too attentive, 3 s is lying, and lied to the police, is that correct? 5 Q. That you believe that he was overly 6 Q. Well, before Mr. Silvestri asked you 9 6 Q. Well, before Mr. Silvestri asked you 9 questions, you said you didn't remember. 1 | 16 | • | 16 | A. Correct. |
| 8 in 2008, you just don't remember? 9 A. In 2008, no, I have no perception as far as suspicion or anything. 1 A. 12008, no, I have no perception as far as suspicion or anything. 1 Q. You just don't remember, or that did not occur? 3 A. What did not occur? 3 A. What did not occur? 3 A. What did not an impression that the was overly attentive. 1 A. No, it's not my impression that that happened. 2 So it never happened, right? 4 A. Which never happened, right? 4 A. Which never happened? 9 G. But that's as you sit here today. 9 G. But that's as you sit here today. 9 G. But that's as you sit here today. 9 G. But you remember, we just had a discussion about Mr. Farmer Mer. 1 M. Ventu. 1 M. No, it's not my impression that the weas overly 3 attentive, and that would have been before May 14, 52008, and you said, "I don't remember." 1 M. What I remember is Margaret told me to speak to Steve Farmer. 9 C. I know. I'm talking about before May 14, 52008, and you adid. Therember." 1 M. No. I'm talking about before May 14, 52008, and you and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell me you don't remember it, but it's possible it tell was anything about 25 Ms. Wolfe? | 17 | | 17 | Q. And it's possible you told Ms. Wolfe that |
| A. In 2008, no, I have no perception as far as 19 patients before May 14, 2008, you just don't remember 0 What did not occur? 21 MR. BEMIS: I object to form. 2 THE WITNESS: I don't remember the 3 A. What did not occur? 21 MR. BEMIS: I object to form. 3 A. What did not occur? 21 MR. MURDOCK: 4 Q. That you had an impression that the was 25 Q. But it's possible it did occur, correct? 1 A. No, it's not my impression that that Page 134 2 A. Whoich never happened, right? 4 A. I don't think so. 2 Q. You don't thinks so. So I guess Ms. Wolfe 3 Q. So it never happened? 4 A. I don't remember him being too attentive, 3 as far as - 2 Q. Well, did she lie? 7 4 I don't remember, we just had a discussion 1 So explain to me what happened at 12 the break when you went out to go pay? Did you have 3 about a conversation you might have had with 4 A. No. I had to pay my parking. 13 Q. Well, before Mr. Silvestri asked you 9 questions, you said you didn't remember. 14 A. No. I had to pay my parking. 15 Q. Yo | 18 | | | |
| 0 susplcton or anything. 20 it. Is that correct? 1 Q. You just don't remember, or that did not occur? 21 MR. BEMIS: I object to form. 2 THE WITNESS: I lobect to form. 22 3 A. What did not occur? 23 Ontratyou had an impression that the was overly attentive. 4 A. No, it's not my impression that that 24 BY MR. MURDOCK: 2 Q. That you happened, right? A. I don't think so. 29 3 Q. So it never happened, right? A. I don't know why she would say things. I 5 4 A. Which never happened? 4. I don't know why she would say things. I 5 5 Q. That you believe that he was overly 5 don't know. 6 Q. But that's as you sit here today. 6 Q. Weil, before Mr. Silvestri asked you 9 Q. But that's as you sit here today. 7 A. I couldn't nawer for her. 8 3 a conversation you might have had with 3 a conversation you might have had with 3 Ms. Wolfe, and you discussed his being you sit weist asked you 9 Q. Weil, before Mr. Silvestri asked you 9 Q. I know. I'm talking about before May 14, | 19 | | 19 | patients before May 14, 2008, you just don't remember |
| 1 Q. You just don't remember, or that did not 21 MR. BEMIS: hobject to form. 2 ccur? THE WITNESS: I don't remember the 3 A. What did not occur? 23 conversation. 3 A. What did not occur? 24 BY MR. MURDOCK: 2 Description 25 Q. But it's possible it did occur, correct? 4 A. No, it's not my impression that that 1 A. I don't think so. So I guess Ms. Wolfe 3 Q. So it never happened, right? 3 A. I don't think so. So I guess Ms. Wolfe 4 A. Which never happened? 4 A. I don't think so. So I guess Ms. Wolfe 5 Q. That you believe that he was overly 5 don't know. 6 5 as far as - 8 Q. Well, did she lie? 7 7 A. I don't remember, we just had a discussion 1 So explain to me what happened at 1 D. But you remember, we just had a discussion 1 So explain to me what happened at 2 Bout a conversation you might have had with 3 a conversation with Mr. Bemis? 3 A. What I remember is Margaret told me to A. No. I | 20 | | 20 | • |
| 2 OCCUT? 22 THE WITNESS: I don't remember the 3 A. What did not occur? 22 THE WITNESS: I don't remember the 3 A. What did not occur? 23 conversation. 4 Q. That you had an impression that the was overly attentive. 24 BY MR. MURDOCK: 5 overly attentive. Page 134 1 A. I don't think so. So I guess Ms. Wolfe 3 Q. So it never happened, right? 3. A. Which never happened? 4. A. I don't think so. So I guess Ms. Wolfe 4 A. Which never happened? 4. I don't think so. So I guess Ms. Wolfe 5 attentive. That did not occur? 6 Q. Well, did she lie? A. I don't know. 6 A. Uh-huh. 9 Q. But that's as you sit here today. 6 Q. Well, before Mr. Slivestri asked you 9 Q. But you remember, we just had a discussion 11 So explain to me what happened at 1 So wolfe, and you usid, "I don't remember." 6 Q. Well, did the pays, you said you did you have 1 So don't know. 10 So explain to me what happened at 2 So wouersation with Mr. Bemis? 11 | 21 | | 21 | MR. BEMIS: I object to form. |
| 2 0:001.1 A. What did not occur? 23 conversation. 4 Q. That you had an impression that he was overly attentive. 24 BY MR. MURDOCK: 5 overly attentive. 25 Q. But it's possible it did occur, correct? 7 A. No, it's not my impression that that 1 A. I don't think so. 2 happened. 2 Q. You don't think so. 2 Page 134 3 Q. So it never happened, right? 3 is lying, and lied to the police, is that correct? 4 A. Which never happened? 3 is lying, and lied to the police, is that correct? 4 A. I don't think so. 2 Q. You don't think so. 5 out never happened? 3 is lying, and lied to the police, is that correct? 4 A. I don't know. 4 A. I don't know. 5 attentive. That did not occur? 6 Q. Well, did she lie? 7 A. Idon't remember him being too attentive, as far as - 9 Q. But that's as you sit here today. 9 Q. But that's as you sit here today. 9 questions, you said you didn't remember. Now you're 10 saying it didn't happen. 11 So explain to me what happened at 12 the break when you wait to go pay? Did you have 13 a conversation with Mr. Bemis? 14 A. Wou're member is Margaret told me to 14 A. No. I had to pay my parking. 15 Q. You do recall that, right? 14 A. That I'm doing a good job. | 22 | | | |
| A. That you had an impression that he was overly attentive. 24 BY MR. MURDOCK: 25 Q. But it's possible it did occur, correct? 1 A. No, it's not my impression that that 1 A. I don't think so. Page 136 1 A. No, it's not my impression that that 1 A. I don't think so. So it appened. 2 Q. So it never happened, right? 4 A. I don't think so. So it guess Ms. Wolfe 3 Q. So it never happened? 4 A. I don't think so. So it guess Ms. Wolfe 3 Q. That you believe that he was overly 5 don't remember him being too attentive, A. I don't know. 3 as far as - 9 Q. But that's as you sit here today. Q. Well, before Mr. Silvestri asked you 9 Q. But you remember, we just had a discussion 11 So explain to me what happened at 12 the break when you went out to go pay? Did you have 13 a conversation with Mr. Bemis? 14 A. Wolfe, and you discussed his being overly 4 A. No. I had to pay my parking. 15 You do recall that, right? A. What I remember." 15 G. Hou doin't have any thing ago oj ob. 18 Q. He told you you were doing a go | | | | |
| A. No, it's not my impression that that Page 134 A. No, it's not my impression that that Page 134 1 A. No, it's not my impression that that Page 134 2 happened. Q. You don't think so. 3 Q. So it never happened, right? A. Which never happened? 4 A. Which never happened? A. I don't think so. 5 overly attentive. That you believe that he was overly 6 attentive. That did not occur? A. I don't remember him being too attentive, 7 A. I don't remember him being too attentive, G. Well, did she lie? 7 A. I don't remember, we just had a discussion Q. Well, before Mr. Silvestri asked you 9 Q. But that's as you sit here today. 9 Q. Well, before Mr. Silvestri asked you 9 A. Uh-huh. 10 So explain to me what happened at 1 Bab ut you remember, we just had a discussion 11 So explain to me what happened at 2 the break when you went out to go pay? Did you have a conversation with Mr. Bemis? 3 A. What I remember is Margaret told me to Speak to Steve Farmer. 9 Q. I know. I'm talking about before May 14, Mr. Bemis? 1 Didn't you and Margaret Wolfe have Q. He told you you were doing a good job. 2 a conversation about Mr. Farmer being overly A. No. | | | - | |
| Page 134Page 134Page 1361A. No, it's not my impression that that1A. I don't think so.Page 1362A. No, it's not my impression that that1A. I don't think so.So it never happened, right?3G. So it never happened, right?3is lying, and lied to the police, is that correct?4A. Which never happened?4A. I don't know why she would say things. I5Q. That you believe that he was overly5don't know.6Q. That you believe that he was overly6Q. Well, did she lie?7A. I don't remember him being too attentive,7A. I couldn't answer for her.8as far as -9Q. Well, before Mr. Silvestri asked you9Q. But that's as you sit here today.9Q. Well, before Mr. Silvestri asked you0A. Uh-huh.10Saying it didn't happen.1D. But you remember, we just had a discussion11So explain to me what happened at2about a conversation you might have had with12the break when you went out to go pay? Did you have3a conversation you aid, "I don't remember."14A. No. I had to pay my parking.22008, and you said, "I don't remember."15Q. You didn't have any conversation with15Ne that't moding a good job.1820Ne.17A. That I'm doing a good job.31No.18Q. He told you you were doing a good21No.21Q. But he did | | - | | • |
| A. No, it's not my impression that that happened. Q. So it never happened, right? A. Which never happened, right? A. Which never happened? Q. That you believe that he was overly attentive. That did not occur? A. I don't know. as far as - Q. But that's as you sit here today. Q. But that's as you sit here today. Q. But you remember, we just had a discussion about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, Soo8, and you said, "I don't remember." Q. I know. I'm talking about before May 14, Q. I know. I'm talking about before May 14, Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it did occur? A. Wolfe? | 25 | - | | |
| A. No, No first my improvision matrix and happened.A. No, No first my improvision matrix and happened.A. Derive mappened, right?A. Which never happened?A. Which never happened?A. Which never happened?A. Much never happened?A. I don't remember him being too attentive, as far asB. But that's as you sit here today.A. Uh-huh.Q. But you remember, we just had a discussion about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, 5 2008, and you said, "I don't remember."A. What I remember is Margaret told me to speak to Steve Farmer.Q. Liknow. I'm talking about before May 14, 12 2008.Didn't you and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it did occur?Didn't wou don't remember it, but it's possible it did occur?Didn't courdDidn't courdDidn't remember it, but it's possible it did occur?Didn't sou and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it bid occur?Didn't sou and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it bid occur?Didn't sou and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't rem | 4 | | 1 | |
| a. So it never happened, right? A. Which never happened? G. That you believe that he was overly attentive. That did not occur? A. I don't remember him being too attentive, as far as G. But that's as you sit here today. G. But you remember, we just had a discussion Q. But you remember, we just had a discussion about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, 2008, and you said, "I don't remember." G. I know. I'm talking about before May 14, 2008. G. I know. I'm talking about before May 14, 2008. G. I know. I'm talking about before May 14, Consent the male patients, and didn't you just a tell me you don't remember it, but it's possible it di do ccur? a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just di do ccur? a conversation about Mr. Farmer being overly a tell me you don't remember it, but it's possible it di do ccur? a conversation with female patients, and didn't you just di do ccur? a conversation with female patients, and didn't you just di do ccur? a conversation with female patients, and didn't you just di do ccur? | 1 | | | |
| A. Which never happened? Q. That you believe that he was overly attentive. That did not occur? A. I don't remember him being too attentive, as far as - Q. But that's as you sit here today. A. Uh-huh. Q. But you remember, we just had a discussion about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, 2008, and you said, "I don't remember." A. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 2008. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it di doccur? | 2 | | | |
| G. That you believe that he was overly5don't know.6A. I don't remember him being too attentive,6Q. Well, did she lie?7A. I don't remember him being too attentive,7A. I couldn't answer for her.8as far as -9Q. But that's as you sit here today.79Q. But that's as you sit here today.9Questions, you said you didn't remember. Now you're102. But you remember, we just had a discussion11So explain to me what happened at2about a conversation you might have had with11So explain to me what happened at3Ms. Wolfe, and you said, "I don't remember."14A. No. I had to pay my parking.6You do recall that, right?15Q. You didn't have any conversation with7A. What I remember is Margaret told me to18Q. He told you you were doing a good job.89Q. I know. I'm talking about before May 14,2008.149Q. I know. I'm talking about before May 14,2008.2011Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good12job?3A. Yeah.13attentive with female patients, and didn't you just414He wou don't remember it, but it's possible it2315G. Did Mr. Bemis tell you anything about16Mc. Bemis tell you anything about17A. Yeah.18Q. Did Mr. Bemis tell you anything about | 3 | | | • • |
| 6attentive. That did not occur?6Q. Well, did she lie?7A. I don't remember him being too attentive, as far as8Q. Well, did she lie?9Q. But that's as you sit here today.9Q. Well, before Mr. Silvestri asked you9Q. But that's as you sit here today.9questions, you said you didn't remember. Now you're10Sas far as8Q. Well, before Mr. Silvestri asked you9Q. But that's as you sit here today.9questions, you said you didn't remember. Now you're10Saying it didn't happen.11So explain to me what happened at11So explain to me what happened at12the break when you went out to go pay? Did you have13a conversation with Mr. Bemis?14A. No. I had to pay my parking.14You do recall that, right?15Q. You didn't have any conversation with15You do recall that, right?16Mr. Bemis?16You do recall that, right?17A. That I'm doing a good job.17A. What I remember is Margaret told me to18Q. He told you you were doing a good job.18Q. I know. I'm talking about before May 14,19didn't tell you anything else?19Qools.21Q. But he did tell you you're doing a good13a conversation about Mr. Farmer being overly23A. Yeah.14tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about2020X. Wife?25 | 4 | | | |
| A. I don't remember him being too attentive, as far as Q. But that's as you sit here today. A. Uh-huh. Q. But you remember, we just had a discussion about a conversation you might have had with 3 Ms. Wolfe, and you discussed his being overly 4 attentive, and that would have been before May 14, 5 2008, and you said, "I don't remember." M. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 0 2008. I know. I'm talking about before May 14, 14 d. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 15 did occur? A. What I remember it, but it's possible it 5 did occur? A. Wolfe? A. Mather member is the patients, and didn't you just toll occur? A. Wolfe? A. Wolfe? A. Wolfe? A. Monet is the patients in the patients is possible it bid occur? A. Wolfe? A. Monet is the patient is the patient is possible it bid is possible | 5 | | | |
| 8 as far as 9 Q. But that's as you sit here today. 1 Q. But you remember, we just had a discussion 1 about a conversation you might have had with 2 about a conversation you might have had with 3 Ms. Wolfe, and you discussed his being overly 4 attentive, and that would have been before May 14, 5 2008, and you said, "I don't remember." 6 You do recall that, right? 7 A. What I remember is Margaret told me to 8 speak to Steve Farmer. 9 Q. I know. I'm talking about before May 14, 10 So explain to me what happened at 12 the break when you went out to go pay? Did you have 13 a conversation with Mr. Bemis? 14 A. No. I had to pay my parking. 15 Q. You didn't have any conversation with 16 Mr. Bemis? 17 A. That I'm doing a good job. 18 Q. He told you you were doing a good job. 19 didn't tell you anything else? 2008. 2008. 2008. 2008. 2008. 21 Didn't you and Margaret Wolfe have 22 a conversation about Mr. Farmer being overly 23 attentive with female patients, and didn't you just 24 tell me you don't remember it, but it's possible it 25 did occur? | 6 | | - | |
| 9 Q. But that's as you sit here today. 9 A. Uh-huh. 1 Q. But you remember, we just had a discussion 1 A. Uh-huh. 1 Q. But you remember, we just had a discussion 2 about a conversation you might have had with 3 Ms. Wolfe, and you discussed his being overly 4 attentive, and that would have been before May 14, 2 2008, and you said, "I don't remember." 6 You do recall that, right? 7 A. What I remember is Margaret told me to 8 speak to Steve Farmer. 9 questions, you said you didn't remember. 11 So explain to me what happened at 12 the break when you went out to go pay? Did you have 13 a conversation with Mr. Bemis? 14 A. No. I had to pay my parking. 15 Q. You didn't have any conversation with 16 Mr. Bemis? 17 A. What I remember is Margaret told me to 8 speak to Steve Farmer. 9 Q. I know. I'm talking about before May 14, 10 2008. 11 Didn't you and Margaret Wolfe have 12 a conversation about Mr. Farmer being overly 13 attentive with female patients, and didn't you just 14 tell me you don't remember it, but it's possible it 15 did occur? | 7 | - | | |
| A. Uh-huh. Q. But you remember, we just had a discussion about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, 2008, and you said, "I don't remember." You do recall that, right? A. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 2008. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it did occur? | | | _ | |
| Q. But you remember, we just had a discussion1So explain to me what happened at2 about a conversation you might have had with12the break when you went out to go pay? Did you have3 Ms. Wolfe, and you discussed his being overlyattentive, and that would have been before May 14,12the break when you went out to go pay? Did you have3 Ms. Wolfe, and you discussed his being overlyattentive, and that would have been before May 14,14A. No. I had to pay my parking.5 2008, and you said, "I don't remember."15Q. You didn't have any conversation with6 You do recall that, right?16Mr. Bemis?7 A. What I remember is Margaret told me to17A. That I'm doing a good job.8 speak to Steve Farmer.19didn't tell you anything else?9 Q. I know. I'm talking about before May 14,19didn't tell you anything else?2008.20A. No.21Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good12job?23A. Yeah.13attentive with female patients, and didn't you just23A. Yeah.1441Q. Did Mr. Bemis tell you anything about25Ms. Wolfe? | 9 | · - | | • • • |
| about a conversation you might have had with Ms. Wolfe, and you discussed his being overly attentive, and that would have been before May 14, 2008, and you said, "I don't remember." You do recall that, right? A. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 2008. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just did occur? | 10 | | | • • |
| about a conversation you discussed his being overly attentive, and that would have been before May 14, 2008, and you said, "I don't remember." You do recall that, right? A. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 2008. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it did occur? did occur? did octur? a conversation with Mr. Bemis? A. No. I had to pay my parking. G. You didn't have any conversation with Mr. Bemis? A. That I'm doing a good job. M. No. M. Yeah. M. Wolfe? | 11 | | | |
| 4 attentive, and that would have been before May 14, 5 2008, and you said, "I don't remember." 6 You do recall that, right? 7 A. What I remember is Margaret told me to 8 speak to Steve Farmer. 9 Q. I know. I'm talking about before May 14, 10 2008. 11 A. No. I had to pay my parking. 12 G. You didn't have any conversation with 13 Mr. Bemis? 14 A. No. I had to pay my parking. 14 A. No. I had to pay my parking. 15 Q. You didn't have any conversation with 16 Mr. Bemis? 17 A. That I'm doing a good job. 18 Q. He told you you were doing a good job. 19 didn't tell you anything else? 20 A. No. 21 Q. But he did tell you you're doing a good 22 job? 23 A. Yeah. 24 Q. Did Mr. Bemis tell you anything about 25 Ms. Wolfe? | 12 | | | |
| 2008, and you said, "I don't remember." You do recall that, right? A. What I remember is Margaret told me to speak to Steve Farmer. Q. I know. I'm talking about before May 14, 2008. Didn't you and Margaret Wolfe have a conversation about Mr. Farmer being overly attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it did occur? 15 Q. You didn't have any conversation with 16 Mr. Bemis? 17 A. That I'm doing a good job. 18 Q. He told you you were doing a good job. 18 Q. He told you you were doing a good job. 19 didn't tell you anything else? 20 A. No. 21 Q. But he did tell you you're doing a good 22 job? 23 A. Yeah. 24 Q. Did Mr. Bemis tell you anything about 25 Ms. Wolfe? | 13 | | | |
| 6You do recall that, right?16Mr. Bemis?7A. What I remember is Margaret told me to speak to Steve Farmer.17A. That I'm doing a good job.9Q. I know. I'm talking about before May 14, 2008.17A. That I'm doing a good job.10Didn't you and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it 5 did occur?16Mr. Bemis?17A. That I'm doing a good job.18Q. He told you you were doing a good job. He 191918Q. He told you you were doing a good job.18Q. He told you you were doing a good job. He 191919Didn't tell you anything else? 2020A. No.21Q. But he did tell you you're doing a good 22 job?2323A. Yeah.24Q. Did Mr. Bemis tell you anything about 2524Wolfe?25 | 14 | • | | |
| 7A. What I remember is Margaret told me to speak to Steve Farmer.17A. That I'm doing a good job.9Q. I know. I'm talking about before May 14, 2008.17A. That I'm doing a good job.10Q. I know. I'm talking about before May 14, 2008.18Q. He told you you were doing a good job.11Didn't you and Margaret Wolfe have 22 a conversation about Mr. Farmer being overly 23 attentive with female patients, and didn't you just 24 tell me you don't remember it, but it's possible it 25 did occur?17A. That I'm doing a good job.12Q. I know. I'm talking about before May 14, 2008.18Q. He told you you were doing a good job.13Q. Didn't tyou and Margaret Wolfe have 2220A. No.14Didn't you and Margaret Wolfe have 2321Q. But he did tell you you're doing a good 2215Ms. Wolfe?23A. Yeah.16Q. Did Mr. Bemis tell you anything about 252517Ms. Wolfe? | 15 | • | | • |
| 8speak to Steve Farmer.18Q. He told you you were doing a good job. He9Q. I know. I'm talking about before May 14,19didn't tell you anything else?2008.2008.20A. No.1Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good2a conversation about Mr. Farmer being overly21Q. But he did tell you you're doing a good23A. Yeah.23A. Yeah.24tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about25Ms. Wolfe? | 16 | - | | |
| 9Q. I know. I'm talking about before May 14, 2008.19didn't tell you anything else? 202008.Didn't you and Margaret Wolfe have 2 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just tell me you don't remember it, but it's possible it 5 did occur?19didn't tell you anything else? 2020A. No.21Q. But he did tell you you're doing a good 22 job?23A. Yeah.24Q. Did Mr. Bemis tell you anything about 2525Ms. Wolfe? | 17 | - | | |
| 2008.2008.20A. No.21Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good22a conversation about Mr. Farmer being overly22job?23attentive with female patients, and didn't you just23A. Yeah.24tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about25Ms. Wolfe? | 18 | | | |
| Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good22a conversation about Mr. Farmer being overly22job?23attentive with female patients, and didn't you just23A. Yeah.24tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about25did occur?25Ms. Wolfe? | 19 | Q. I know. I'm talking about before May 14, | | |
| 1Didn't you and Margaret Wolfe have21Q. But he did tell you you're doing a good22a conversation about Mr. Farmer being overly22job?23attentive with female patients, and didn't you just23A. Yeah.24tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about25did occur?25Ms. Wolfe? | 20 | | | |
| 22 a conversation about Mr. Farmer being overly 3 attentive with female patients, and didn't you just 4 tell me you don't remember it, but it's possible it 5 did occur?22 job? 23 A. Yeah. 24 Q. Did Mr. Bemis tell you anything about 25 Ms. Wolfe? | 21 | | | |
| 23attentive with female patients, and didn't you just23A. Yeah.24tell me you don't remember it, but it's possible it24Q. Did Mr. Bemis tell you anything about25did occur?25Ms. Wolfe? | 22 | a conversation about Mr. Farmer being overly | 22 | - |
| 24 tell me you don't remember it, but it's possible it 24 Q. Did Mr. Bemis tell you anything about 25 did occur? 25 Ms. Wolfe? | 23 | attentive with female patients, and didn't you just | 23 | |
| 25 did occur? 25 Ms. Wolfe? | 24 | tell me you don't remember it, but it's possible it | 24 | Q. Did Mr. Bemis tell you anything about |
| | 25 | | 25 | Ms. Wolfe? |
| | | | L | |



| JA | NE DOE vs. VALLEY HEALTH SYSTEM LL | С | 137–140 |
|----|--|----------|--|
| | Page 137 | | Page 139 |
| 1 | A. No. | 1 | A. We get tested specifically to our |
| 2 | Q. Did Mr. Bemis tell you not to tell me that | 2 | department. |
| 3 | you had a conversation about Ms. Wolfe? | 3 | Q. Right. But you're not med-surg. |
| 4 | A. No. | 4 | A. I'm not med-surg. |
| 5 | Q. So explain to me why for several hours this | 5 | Q. So is it safe to say you really don't know |
| 6 | morning you told me, "No, I don't remember this, but | 6 | what happens on the med-surg units? You're just |
| 7 | it's possible it did occur," and now you're stating, | 7 | assuming what happens, because you are an RN in |
| 8 | "It did not occur?" | 8 | general, is that correct? |
| 9 | MR. BEMIS: I'm going to object to | 9 | A. Yes. |
| 10 | form. Asked and answered. | 10 | Q. When the next shift comes on you work |
| 11 | THE WITNESS: Can you restate the | 11 | graveyard, is that correct? |
| 12 | question maybe? I may be able to answer you better. | 12 | A. Correct. |
| 13 | BY MR. MURDOCK: | 13 | Q. 7:00 p.m. to 7:00 a.m.? |
| 14 | Q. Okay. Look. I want you to turn to page 8. | 14 | A. Correct. |
| 15 | This morning you told me that when | 15 | Q. The next shift comes on at what time? |
| 16 | Ms. Wolfe told the police, "He was concerned because | 16 | A. 7:00 a.m. |
| 17 | he was very overly attentive with female patients and | 17 | Q. How do they know what happened the night |
| 18 | very anxious to connect them to the monitors and | 18 | before? |
| 19 | disconnect them from the monitors, which would | 19 | A. Specifically to a patient assignment? |
| 20 | require him to reach into their clothing" you told | 20 | Q. Yes. |
| 21 | me this morning you didn't remember that, but it's | 21 | A. They get report from the previous nurse who |
| 22 | possible it did occur. | 22 | had that patient. |
| 23 | Do you remember telling me that | 23 | Q. Oh, okay. And would that be in writing, or |
| 24 | for several hours this morning? | 24 | is that verbally? |
| 25 | A. Okay. Yes. | 25 | A. Verbal, and then they'll show the part of |
| | | | |
| 1 | Page 138 Q. And now are you changing your testimony and | 1 | Page 140 the chart that needs to be shown, as far as vital |
| 2 | saying, "No, it definitely didn't occur," or are you | 2 | signs, whatever happened. |
| 3 | just saying, "No, I just don't remember it occurring. | 3 | Q. Okay. Whose job is it, in terms of |
| 4 | It's possible it did occur?" | 4 | hierarchy whose job is it to make sure the CNAs |
| 5 | A. It's possible it did occur, but I don't | 5 | are doing their jobs? |
| 6 | remember the exact conversation. | 6 | A. The registered nurse, the charge nurse |
| 7 | Q. Okay. Thank you. | 7 | do you want to go really high? |
| 8 | A. Thanks for clarifying it. | 8 | Q. Keep going. That's fine. |
| 9 | Q. Thank you. I appreciate it. | 9 | A. The director of the department. |
| 10 | | 10 | Q. Okay. |
| 11 | Now, have you ever worked on | 11 | A. House supervisor. |
| 12 | med-surg? A. No. | 12 | Q. All at Centennial Hills Hospital. |
| | A. No. Q. Have you ever worked on med-surg at | 13 | |
| 13 | • | | A. You know, it depends on how high we're going up the ladder. |
| 14 | Centennial Hills Hospital? A. No. | 14 15 | |
| 15 | | | Q. But I'm just saying specifically at |
| 16 | Q. Do you know all the policies, procedures, | 16 | Centennial Hills Hospital. It's the RN's job to make |
| 17 | and rules at Centennial Hills Hospital regarding | 17 | sure the CNAs are doing their jobs, correct? |
| 18 | med-surg? | 18 | A. Yes. |
| 19 | A. I have a place where I can find out through | 19 | Q. It's the charge nurse's job to make sure |
| 20 | the computer the policies. | 20 | the RNs are doing their jobs, correct? |
| 21 | Q. I know that. But do you know it as you sit | 21 | A. Yes. |
| 22 | here today? | 22 | Q. And it's whoever is over the charge nurses |
| 23 | A. I don't know all of it. | 23 | to make sure well, I guess the director of |
| 24 | Q. And you've certainly never been tested on | 24 | nursing? |
| 25 | it, have you? | 25 | A. Yeah. |
| | | | |



| JA | NE DUE VS. VALLET HEALTH STSTEWILL | U | 141–144 |
|----------|---|----------|--|
| 1 | Page 141 Q to make sure that the charge nurses are | 1 | Page 143 time, yeah. |
| 2 | doing their job, right? | 2 | Q. Sure. Is there a reason I guess when |
| 3 | A. Correct. | 3 | |
| 4 | Q. Okay. Does the agency manager – the staff | 1. | you're cleaning someone's anus if they've had a bowel |
| 5 | agency manager come into play there at all? | 4 | movement, you certainly can wipe the anus, is that correct? |
| 6 | MR. BEMIS: I object to form. Calls | - | |
| | | 6 | A. Correct. |
| | for speculation. | 7 | Q. Have you ever seen a policy and/or |
| 8 | BY MR. MURDOCK: | 8 | procedure a written policy or procedure from |
| 9 | Q. In the hierarchy? | 9 | Centennial Hills Hospital that details how to clean a |
| 10 | A. I don't know. | 10 | patient who has just had a bowel movement and needs |
| 11 | Q. Well, you've been a charge nurse at | 11 | help cleaning? |
| 12 | least you're a charge relief nurse from time to time, | 12 | A. I've never looked for it, so I don't know |
| 13 | right? | 13 | if it exists. |
| 14 | A. Yes. | 14 | Q. Have you ever been told that it existed? |
| 15 | Q. Have you ever had an agency manager come in | 15 | A. No. |
| 16 | and tell the CNA what to do during your shift? | 16 | Q. Have you ever seen a policy and procedure |
| 17 | A. No, I've never seen that. | 17 | from Centennial Hills Hospital as to how to put heart |
| 18 | Q. Would you ever call the agency manager to | 18 | leads on a female patient? |
| 19 | ask them if a CNA could do something on your shift? | 19 | A. They're the same, male and female. |
| 20 | A. No, i would not. | 20 | Q. Okay. Have you ever seen a written policy |
| 21 | Q. Okay. Outside of this case you said you | 21 | and procedure as to how to do that? |
| 22 | looked on Yahoo news, and I assume you're computer | 22 | A. I've never looked for it, so I don't know. |
| 23 | savvy? | 23 | Q. Because that's something you just know |
| 24 | A. Cellphone. | 24 | because you're an RN, right? |
| 25 | Q. Had you ever heard of a CNA sexually | 25 | A. Correct. |
| | Page 142 | l | Page 144 |
| 1 | abusing or assaulting a patient? Had you ever heard | 1 | Q. Now, do you remember reading Plaintiff's |
| 2 | of that anywhere at all? | 2 | Exhibit 1 in full? |
| 3 | A. No. | 3 | A. Yes, today. |
| 4 | Q. Did you ever hear of it at any other | 4 | Q. Outside of things that you just don't |
| 5 | hospitals in Las Vegas? | 5 | remember that are possible that happened, but you |
| 6 | A. No. | 6 | just don't remember them do you dispute anything |
| 7 | Q. Had you ever been told that you are not | 7 | that's in this statement? |
| 8 | allowed to sexually assault a patient? | 8 | MR. BEMIS: I object to form. Asked |
| 9 | A. We're not allowed to do harm to any | 9 | and answered. |
| 10 | patient. | 10 | THE WITNESS: I don't know how to |
| 11 | Q. Okay. Are you allowed to touch a patient | 11 | answer that. |
| 12 | in a way for instance, are you allowed to touch a | 12 | BY MR. MURDOCK: |
| 13 | female patient's nipples? | 13 | Q. And again, listen to my question. |
| 14 | A. No. Absolutely not. | 14 | Outside of things that you may not |
| 15 | Q. Okay. Are you allowed to touch a female | 15 | remember, or you may not recall they're possible, |
| 16 | patient's vagina? | 16 | you just don't recall them outside of that, do you |
| 17 | MR. BEMIS: I object to form. | 17 | dispute anything in Plaintiff's Exhibit 1? |
| 18 | Incomplete hypothetical. | 18 | MR. BEMIS: Same objection. |
| 19 | THE WITNESS: For what purpose? | 19 | BY MR. MURDOCK: |
| 20 | BY MR. MURDOCK: | 20 | Q. In other words, let me put it this way. |
| 20 | Q. Any purpose whatsoever. | 21 | Can you point to anything in |
| 22 | A. You have to have a reason. No, there's no | 22 | Plaintiff's Exhibit 1 and say, "Absolutely not, this |
| 22 | reason for me to touch a vagina, as far as work. | 22 | did not occur?" |
| 23 24 | Q. What about medically? | 23 24 | A. As far as the conversations? |
| 24 25 | A. If we have to insert a Foley, then at that | 24 25 | Q. No. Anything in Plaintiff's Exhibit 1. |
| 20 | A. It we have to insert a Foley, then at tildt | 20 | |
| | | | |



×. .-

C.C.,

5

| JA | NE DOE vs. VALLEY HEALTH SYSTEM LL | C | 145–148 |
|----------------------|---|----------------|---|
| <u> </u> | Page 145 | Τ. | Page 147 |
| 1 | Can you show me in Plaintiff's | | him or her, how is that identified in the charts at |
| 2 | Exhibit 1 anything anything at all where you state | | Centennial Hills Hospital? |
| 3 | to yourself, "No, this did not occur?" | 3 | A. "Heart monitor." |
| 4 | A. Just it might have happened? It's | 4 | Q. There's no like acronym or |
| 5 | possible? | 5 | A. No. |
| 6 | Q. If it's possible, yeah. | 6 | Q. I want to just show you three pages. I |
| 7 | A. Possible. | 7 | want to show you Exhibit 2 for identification |
| 8 | Q. Okay. Let me ask the question again. | 8 | purposes. For whatever reason the Bates stamp didn't |
| 9 | Can you state anything in | 9 | print, so my computer must be doing something funny. |
| 10 | Plaintiff's Exhibit 1, anything at all, that | 10 | |
| 11 | absolutely did not happen? | 11 | date is May 15, 2008 at 20:59:58. |
| 12 | MR. BEMIS: Asked and answered. | 12 | |
| 13 | THE WITNESS: As far as the | 13 | document and just tell me what that document is |
| 14 | conversations or | 14 | measuring or showing? |
| 15 | BY MR. MURDOCK: | 15 | MR. BEMIS: I object to form. Calls |
| 16 | Q. As far as anything in Plaintiff's Exhibit | 16 | for speculation. |
| 17 | 1. Everything that Ms. Wolfe stated to the cops. | 17 | MR. MURDOCK: I actually agree with |
| 18 | Everything. | 18 | John. |
| 19 | Can you state absolutely, "This | 19 | THE WITNESS: It's just a rhythm. It's |
| 20 | did not happen." Something in this document. Is | 20 | not a 12-lead EKG. |
| 21 | there anything in here where you state to yourself, | 21 | BY MR. SILVESTRI: |
| 22 | "Absolutely this did not happen?" | 22 | Q. Is it a heart monitor? |
| 23 | A. As far as? | 23 | A. It's a heart monitor, yes. |
| 24 | Q. Is there anything in this statement that | 24 | Q. Is it a moment in time or |
| 25 | you can tell us today, "No, Mr. Murdock, I can show | 25 | A. Yeah. That picture, yes, is a moment in |
| | Page 146 | | Page 148 |
| 1 | you right here in this statement, this did not | 1 | |
| 2 | occur." | 2 | Q. So does that mean that the heart monitor is |
| 3 | Is there anything in this | 3 | attached and then detached, or does it remain |
| 4 | statement, in full, that did not occur? | 4 | attached? |
| 5 | A. I cannot for certain answer that question. | 5 | A. At this point it's attached. |
| 6 | It could be possible. I don't know. | 6 | Q. Would it typically remain attached to the |
| 7 | Q. I understand it could be possible. | 7 | patient? |
| 8 | What I'm asking you is, is there | 8 | MR. MURDOCK: Objection. Speculation. |
| 9 | anything in Plaintiff's Exhibit 1 that you dispute in | 9 | MR. BEMIS: Calls for speculation. |
| 10 | total? In other words, that you say, "No, it did not | 10 | BY MR. SILVESTRI: |
| 11 | occur." Anything at all. Anything in this | 11 | Q. Well, let me just give you the background. |
| 12 | statement. | 12 | You said that a tech might come in |
| 13 | A. No. | 13 | and do a 12-lead EKG. |
| 14 | MR. MURDOCK: Thank you. I have no | 14 | A. Right. |
| 15 | further questions. | 15 | Q. They would attach the 12 leads, do a |
| 16 | MR. SILVESTRI: I have just a couple | 16 | measurement, which would take a minute or two, and |
| 17 | follow-ups. | 17 | then they would detach the leads and give the report |
| 18 | ionen abai | 18 | to the doctor, or perhaps to the nurse? |
| 19 | FURTHER EXAMINATION | 19 | A. Correct. |
| 20 | BY MR. SILVESTRI: | 20 | Q. Does the same process occur for the heart |
| 2 .U | Q. Mr. Sumera, if a patient has or gets an EKG | 21 | monitor, or does the heart monitor those three or |
| 21 | | 22 | four or five leads stay attached? |
| | test done how is that twoically documented in the | | • |
| 22 | test done, how is that typically documented in the | 23 | A. First of all are you saving this is a |
| 21 22 23 24 | chart? Does it just say EKG, or ECG? | 23 24 | A. First of all, are you saying this is a 12-lead printout? |
| 22 | | 23 24 25 | A. First of all, are you saying this is a 12-lead printout? Q. I have no idea what it is. I'm asking you. |



| | NE DOE vs. VALLEY HEALTH SYSTEM LL(| | 149–15 |
|---|---|--|--|
| | Page 149 | 1 | Page 15 |
| 1 | A. It's not a 12-lead printout. | 1 | equipment being attached to a patient, correct? |
| 2 | Q. Is it a heart monitor? | 2 | A. Correct. |
| 3 | It's just a regular heart rhythm printout. | 3 | Q. Now, are you able to tell me from that |
| 4 | Q. From a 3 or 5-lead monitor? | 4 | document whether it was a 3-lead or a 5-lead heart |
| 5 | MR. BEMIS: 1 object to form. It calls | 5 | monitor? If you can tell. |
| 6 | for speculation. | 6 | A. I can't tell. |
| 7 | BY MR. SILVESTRI: | 7 | Q. You can't tell. |
| 8 | Q. If you know. | 8 | MR. MURDOCK: Are you attaching it, |
| 9 | A. I don't know how many leads they're using. | 9 | Jim? |
| 10 | If it's a telemetry box, they will use 5 leads. If | 10 | MR. SILVESTRI: Yeah, I'll attach it. |
| 11 | it's the wireless telemetry boxes, it will be 5 | 11 | I'm going to attach it as an exhibit. I might have |
| | - | 12 | to use it for the next witness, but I'm going to |
| 12 | leads. | 1 | · |
| 13 | Q. I just need to know these are records | 13 | attach it. |
| 14 | from Centennial Hills. All I want to know is, do you | 14 | (Plaintiff's Exhibits 2 & 3 marked.) |
| 15 | know what that Exhibit 2 is depicting? | 15 | BY MR. SILVESTRI: |
| 16 | A. Normal sinus rhythm. | 16 | Q. I want you to take a look at Exhibit 3. |
| 17 | Q. From what instrument? A heart monitor? | 17 | Can you take a look at Exhibit 3, |
| 18 | A. My eyeball. | 18 | |
| 19 | Q. Somehow that document got printed, | 19 | if you know? This also I'll just represent is a |
| 20 | recording some type of results from this patient. | 20 | record from Centennial Hills Hospital. |
| 21 | What I want to know is, did those | 21 | MR. BEMIS: I object to form. Calls |
| 22 | results come from a 3 or 5-lead heart monitor? | 22 | for speculation. You can answer. |
| 23 | MR. BEMIS: Form. Calls for | 23 | THE WITNESS: This looks like a 12-lead |
| 24 | speculation. | 24 | EKG reading. |
| 25 | THE WITNESS: Where did this come from? | 25 | |
| | Page 150 | | Page 15 |
| 1 | BY MR. SILVESTRI: | 1 | BY MR. SILVESTRI: |
| 2 | Q. Yes, correct. Where did number 2 come | 2 | Q. Okay. And for the record, can you just |
| 3 | from? | 3 | look at that record and tell me, for example, what |
| 4 | A. I mean where did this printout come from? | 4 | · · · · · · · · · · · · · · · · · · · |
| 5 | Q. Yeah. Do you know where the information on | 5 | A. The date is May 15, 2008. Military time |
| 6 | Exhibit 2 came from? | 6 | converted to our time is 4:56 p.m. |
| - | A. No. | U . | |
| 7 | A. NU. | 7 | - |
| | | 7 9 | Q. Okay. |
| 8 | Q. Did it come from a heart monitor? | 8 | Q. Okay. (Plaintiff's Exhibit 4 marked.) |
| 9 | Q. Did it come from a heart monitor?A. It looks like a heart rhythm. | 8 9 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: |
| 9 10 | Q. Did it come from a heart monitor?A. It looks like a heart rhythm.Q. Does a heart rhythm come from a heart | 8 9 10 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just |
| 9 10 11 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? | 8 9 10 11 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is |
| 9 10 11 12 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's | 8 9 10 11 12 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. |
| 9 10 11 12 13 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by | 8 9 10 11 12 13 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is |
| 9 10 11 12 13 14 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. | 8 9 10 11 12 13 14 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? |
| 9 10 11 12 13 14 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. | 8 9 10 11 12 13 14 15 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for |
| 9 10 11 12 13 14 15 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. | 8 9 10 11 12 13 14 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. |
| 9 10 11 12 13 14 15 16 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. | 8 9 10 11 12 13 14 15 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for |
| 9 10 11 12 13 14 15 16 17 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out | 8 9 10 11 12 13 14 15 16 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. |
| 9 10 11 12 13 14 15 16 17 18 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being | 8 9 10 11 12 13 14 15 16 17 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: |
| 9 10 11 12 13 14 15 16 17 18 19 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? | 8 9 10 11 12 13 14 15 16 17 18 19 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. |
| 9 10 11 12 13 14 15 16 17 18 19 20 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? A. The only way you would get a rhythm is if | 8 9 10 11 12 13 14 15 16 17 18 19 20 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. A. It looks like a 12-lead EKG printout. |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? A. The only way you would get a rhythm is if the monitor is attached. | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. A. It looks like a 12-lead EKG printout. Q. Okay. Is it your understanding that heart |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? A. The only way you would get a rhythm is if the monitor is attached. Q. Okay. It's not from a stethoscope. | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. A. It looks like a 12-lead EKG printout. Q. Okay. Is it your understanding that heart monitors, whether they be 3-lead or 5-lead, typical |
| 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? A. The only way you would get a rhythm is if the monitor is attached. Q. Okay. It's not from a stethoscope. A. No. | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. A. It looks like a 12-lead EKG printout. Q. Okay. Is it your understanding that heart monitors, whether they be 3-lead or 5-lead, typicall remain attached to a patient until a doctor orders |
| 9 10 11 12 13 14 15 16 17 18 20 21 22 23 24 | Q. Did it come from a heart monitor? A. It looks like a heart rhythm. Q. Does a heart rhythm come from a heart monitor? A. If this is coming from a patient, it's being recorded in a telemetry room watched by technicians. Q. Okay. A. And from that room they can print out anybody's heart rhythm on a piece of paper. Q. As a result of a heart monitor being attached to that patient, is that correct? A. The only way you would get a rhythm is if the monitor is attached. Q. Okay. It's not from a stethoscope. | 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. Okay. (Plaintiff's Exhibit 4 marked.) BY MR. SILVESTRI: Q. And if you would look at Exhibit 4 and just tell me if you know what Exhibit 4 is. This is helping me so I know what I'm looking at. Can you tell me what Exhibit 4 is measuring? MR. BEMIS: Same objection. Calls for speculation. BY MR. SILVESTRI: Q. Which also I'll purport to you is a record from Centennial Hills Hospital. A. It looks like a 12-lead EKG printout. Q. Okay. Is it your understanding that heart monitors, whether they be 3-lead or 5-lead, typicall |



÷.).

2.

1

× | | |

| | NE DOE vs. VALLEY HEALTH SYSTEM LL(| | 153-15 |
|--|--|---|---|
| | Page 153 | | Page 15 |
| 1 | Q. So it's different from the 12-lead EKG? | 1 | telemetry room might save or keep in a file, or |
| 2 | A. Yes. | 2 | anything like that? |
| 3 | Q. Okay. And if a 3 or 5-lead heart monitor | 3 | A. Yeah. I don't know. |
| 4 | becomes detached, or malfunctions at any time, would | 4 | MR. SILVESTRI: That's all I've got. |
| 5 | it be recorded on a document like Exhibit 2 anywhere | 5 | Thanks. |
| 6 | for a patient, or would it only be noted in the chart | 6 | MR. MURDOCK: I think you can go. |
| 7 | that the nurse writes in or types in? | 7 | You have the right to make any |
| 8 | A. Which one is the Exhibit 2? The first one? | 8 | changes to your answers. However, I caution you that |
| 9 | Q. Well, it says "2" on it. Do you see my red | 9 | I or any other counsel can comment on the fact that |
| 10 | "2" on the bottom right-hand corner? | 10 | you made changes, and that may affect your |
| 11 | A. Yes. | 11 | credibility. |
| 12 | Q. You said that appeared to be taken from a | 12 | Do you understand that? |
| 13 | heart monitor. | 13 | THE WITNESS: I understand. |
| 14 | A. Correct. | 14 | MR. MURDOCK: You can also waive that |
| | Q. Either a 3 or a 5-lead heart monitor. | 15 | right to read the deposition. In other words, you |
| 15 | What I want to know is, for the | 16 | can say to yourself, "Hey, I'm sure she took it down |
| 16 | | 17 | right." |
| 17 | heart monitors, to your knowledge, if such became | 18 | But it's up to you, whether you |
| 18 | detached or malfunctioned in any way, would it be | | |
| 19 | documented anywhere, other than in a nurse's notes in | 19 | want to waive it or not. It's your call, but you've |
| 20 | the chart? | 20 | got to tell her. |
| 21 | A. First of all, is this a wall monitor or is | 21 | MR. BEMIS: We'll read and sign. |
| | it the wireless telemetry box? | 22 | MR. MURDOCK: Can you answer, please? |
| 23 | Q. Let's start with the first one. Let's | 23 | THE WITNESS: We will read it. |
| 24 | assume it's the telemetry box. | 24 | MR. MURDOCK: Thank you. |
| 25 | A. So that's being read by techs. Again, they | 25 | (The deposition concluded at 12:43 p.m.) |
| | Page 154 | | Page 15 |
| 1 | will call the specific floor where the patient is and | 1 | REPORTER'S CERTIFICATE |
| 2 | they will let the nurse know it's detached. | 2 | STATE OF NEVADA) |
| 3 | Q. Do you know when that telemetry personnel | |) ss. |
| 4 | calls the nurse, if that instance is recorded on any | 3 | COUNTY OF CLARK) |
| 5 | piece of paper that looks akin to or like Exhibit 2? | 4 | I, Carol O'Malley, Nevada Certified Court |
| 6 | Or would it only be recorded by the nurse if the | 5 | Reporter 178, do hereby certify: |
| 7 | nurse puts it in the chart? | 6 | That I reported the taking of the deposition |
| 8 | MR. BEMIS: Calls for speculation. | 7 | of RENATO SUMERA, RN on May 1, 2015 commencing at th |
| U | | | |
| 0 | THE WITNESS. If the tech calls the | 8 | hour of 9:30 a.m.; |
| 9 10 | THE WITNESS: If the tech calls the | 8 9 | That prior to being examined, the witness was b |
| 10 | nurse, the nurse would just go in there and fix it | | |
| 10 11 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. | 9 | That prior to being examined, the witness was b |
| 10 11 12 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: | 9 10 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole |
| 10 11 12 13 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the | 9 10 11 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; |
| 10 11 12 13 14 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? | 9 10 11 12 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a |
| 10 11 12 13 14 15 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. | 9 10 11 12 13 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a |
| 10 11 12 13 14 15 16 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically | 9 10 11 12 13 14 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a |
| 10 11 12 13 14 15 16 17 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor | 9 10 11 12 13 14 15 | That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my said shorthand notes taken down at said time. Review of the transcript was requested. |
| 10 11 12 13 14 15 16 17 18 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" | 9 10 11 12 13 14 15 16 | That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my said shorthand notes taken down at said time. Review of |
| 10 11 12 13 14 15 16 17 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. | 9 10 11 12 13 14 15 16 17 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my sai shorthand notes taken down at said time. Review of the transcript was requested. |
| 10 11 12 13 14 15 16 17 18 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. BY MR. SILVESTRI: | 9 10 11 12 13 14 15 16 17 18 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my sai shorthand notes taken down at said time. Review of the transcript was requested. I further certify that I am not a relative or |
| 10 11 12 13 14 15 16 17 18 19 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. | 9 10 11 12 13 14 15 16 17 18 19 | That prior to being examined, the witness was be me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my sai shorthand notes taken down at said time. Review of the transcript was requested. I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor financially interested in said action. |
| 10 11 12 13 14 15 16 17 18 19 20 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. BY MR. SILVESTRI: Q. Would it be recorded anywhere, to your | 9 10 11 12 13 14 15 16 17 18 19 20 | That prior to being examined, the witness was be me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my sai shorthand notes taken down at said time. Review of the transcript was requested. I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor financially interested in said action. IN WITNESS WHEREOF, I have hereunto set my hand |
| 10 11 12 13 14 15 16 17 18 19 20 21 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. BY MR. SILVESTRI: Q. Would it be recorded anywhere, to your knowledge? | 9 10 11 12 13 14 15 16 17 18 19 20 21 | That prior to being examined, the witness was b me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my sai shorthand notes taken down at said time. Review of the transcript was requested. I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor financially interested in said action. IN WITNESS WHEREOF, I have hereunto set my hand in my office in the County of Clark, State of Nevada |
| 10 11 12 13 14 15 16 17 18 19 20 21 22 | nurse, the nurse would just go in there and fix it real quick. It's something easily done. BY MR. SILVESTRI: Q. Okay. Would that typically be put in the patient's chart? A. No. Q. And would it be recorded electronically anywhere that, "Jim Silvestri's heart monitor malfunctioned at 4:55 p.m.?" MR. MURDOCK: Objection. Speculation. BY MR. SILVESTRI: Q. Would it be recorded anywhere, to your knowledge? A. I don't know what the technician in the | 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my said shorthand notes taken down at said time. Review of the transcript was requested. I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor financially interested in said action. IN WITNESS WHEREOF, I have hereunto set my hand in my office in the County of Clark, State of Nevada |

ESQUIRE

50

May 01, 2015 157–159

| | Page 157 | T | | Page 159 |
|----|---|----|------------------------------|----------|
| 1 | DEPOSITION ERRATA SHEET | 1 | DEPOSITION ERRATA SHEET | |
| 2 | | 2 | Page No. Line No. Change to: | |
| 3 | File No. 104099 | 3 | Reason for change: | |
| 4 | Case Caption: Jane Doe vs. Valley Health System | 4 | Page No. Line No. Change to: | |
| 5 | | 5 | Reason for change: | |
| 6 | | 6 | Page No. Line No. Change to: | |
| 7 | | 7 | Reason for change: | |
| 8 | DECLARATION UNDER PENALTY OF PERJURY | 8 | Page No. Line No. Change to: | 1 |
| 9 | | 9 | Reason for change: | |
| 10 | I declare under penalty of perjury that I have | 10 | Page No. Line No. Change to: | |
| 11 | read the entire transcript of my deposition taken in | 11 | Reason for change: | |
| 12 | the captioned matter or the same has been read to me, | 12 | Page No. Line No. Change to: | |
| 13 | and the same is true and accurate, save and except | 13 | Reason for change: | |
| 14 | for changes and/or corrections, if any, as indicated | 14 | Page No. Line No. Change to: | |
| 15 | by me on the DEPOSITION ERRATA SHEET hereof, with the | 15 | Reason for change: | |
| 16 | understanding that I offer these changes as if still | 16 | Page No. Line No. Change to: | |
| 17 | under oath. | 17 | Reason for change: | |
| 18 | | 18 | Page No. Line No. Change to: | |
| 19 | Signed this day of ,20 . | 19 | Reason for change: | |
| 20 | | 20 | Page No. Line No. Change to: | |
| 21 | | 21 | Reason for change: | |
| 22 | | 22 | - | |
| | RENATO SUMERA, RN | 23 | | |
| 23 | | 24 | SIGNATURE: DATE: | |
| 24 | | | RENATO SUMERA, RN | [|
| 25 | | 25 | | |
| 25 | | | | |
| | Page 158 DEPOSITION ERRATA SHEET | | | |
| 1 | | | | |
| 2 | Page No. Line No. Change to: | | | |
| 3 | Reason for change: | | | |
| 4 | Page No. Line No. Change to: | | | |
| 5 | Reason for change: | | | |
| 6 | Page No. Line No. Change to: | | | |
| 7. | Reason for change: | | | |
| 8 | Page No. Line No. Change to: | | | |
| 9 | Reason for change: | | | |
| 10 | Page No. Line No. Change to: | | | |
| 11 | Reason for change: | | | |
| 12 | Page No. Line No. Change to: | | | |
| 13 | Reason for change: | | | |
| 14 | Page No. Line No. Change to: | | | |
| 15 | Reason for change: | | | |
| 16 | Page No. Line No. Change to: | | | |
| 17 | Reason for change: | | | |
| 18 | Page No. Line No. Change to: | | | |
| 19 | Reason for change: | | | ļ |
| 20 | Page No. Line No. Change to: | | | |
| 21 | Reason for change: | | | |
| 22 | | | | |
| 23 | | | | |
| 24 | SIGNATURE: DATE: | | | |
| | RENATO SUMERA, RN | | | |
| 25 | | | | |
| | | L | | |



TAB 55

| 9/23/2009 04:20 PM For Facility: | Universal Health Service RISK MANAGEMENT WORKSHEE CONFIDENTIAL INFORMATIC CENTENNIAL HILLS HOSPITZ | ст N | | | |
|---|---|--|--|--|--|
| MRN: | Age: DOB | Sex: | | | |
| ᇌ곇펞춬슻곹큟튤듁흋훢 ^ᆣ 놣횩ᇊᇹ꾜쓚ҵӼ챴讷쎻鸿맖屖르봗귳ᇊ施드边군 | ENCOUNTER DATA | 특종 의 함 분류장 참장 측 (리뷰폰 북파 2007) 또 3 정리 회 참 측 약 한 또 한 한다. 인 | | | |
| Start Date: 5/15/2008 | Acct. No.: 8000118219 | | | | |
| Admit Phys: SHUJA, AMIR | Attend Phys: SHUJA, AMIR | | | | |
| Complaint: | | | | | |
| End Date: 5/17/2008 Disch Dx: | | | | | |
| ⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰⋰ | GENERAL EVENT DATA == | 400xx23tritxx2eraxxxx2craticities | | | |
| Date Received: 5/16/2008 | No: 08-22396 | Info Source: | | | |
| Event Date: 5/16/2008 | Time: 7:00A | Shift: | | | |
| Loc: 78-CH | Room: 725 | Facility: CENTENNIAL HILLS HOSPITAL MEDI | | | |
| Phys Notified: N | Notified Phys: | | | | |
| Type: SAF/SEC/PRIV - SEXUAL ASSAUL | T/RAPE ALLEGATION | · · · · · · · · · · · · · · · · · · · | | | |
| | Quantity: | Significance: LEVEL III RISK | | | |
| Attr Depts: Attr | Empls: | Attr Phys: | | | |
| Outcomes: INJURY SUSTAINED-OTHER | Parameter | cs : | | | |
| Treatment: | | | | | |
| Summary Comment: | | | | | |
| Status: CLOSED, TRACK AND TREND | Entered by: WESCOTT, LORI | RAINE | | | |
| Comments: At approximately 0750, I was asked to speak to the patient. As I entered the room, I identified myself and found the patient in tears. She proceeded to tell me that she was taken care of in the ED by two wonderful nurses. She even got their phone numbers. She then went on to say that the male "nurse" did start to touch her on the elevator, coming up from the ED in the elevator, adjusting her gown, "touching her" under the blanket. He told her he would return in about 2 hours or so to check on her. He did return acound 7AM. She stated that "he touched her private areas, told her how beautiful she was, touched her breasts." " He stroked my legs and tried to penetrate me with his fingers." "He said Can't tell anyone - I'll lose my job." The patient described him as an older man with white hair and beard. She gave me the phone number he hsd written down for her. I tried to comfort the patient and told her that we would keep her safe from him. I was going to arrange for a CNA sitter to sit with her when her husband came in. He stated she had called him and he was aware of the situation. He stated he would be staying with her. I then notified my CNO - Carol Butler, Quality Director- Janet Callihan and Social worker Karen Rice. I later notified Security when the patient's husband said Metro was on the way. I called the phone number the patient had given me and identified the person as Steve Farmer, CNA. | | | | | |
| | | | | | |



CHH Incident Report00003

9/23/2009 04:20 PM Universal Health Services RISK MANAGEMENT WORKSHEET CONFIDENTIAL INFORMATION For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

MRN:

Comments: (Continued)

Security was contacted on this incident. I have attached the Security Report detailing security's involvement.

ON 5/16/08 AT 0900 HOURS I WAS DISPATCHED TO THE SEVENTH FLOOR. UPON ARRIVAL I SPOKE WITH (WESCOTT, LORI) THE CHARGE NURSE ON THE SEVENTH FLOOP, MS. WESCOTT INFORMED SECURITY THAT THE PATIENT A WAS CLAIMING SHE WAS SEXUAL ASSAULTED BY A NURSE ON 5/16, BETWEEN THE HOURS OF 0300-0700. MS. WESCOTT STATED THE PATIENT WAS CLAIMING A NURSE FROM THE E/R A (FARMER, STEVEN) SEXUALLY ASSAULTED WHILE TRANSPORTING HER TO ROOM # 725.

MS. WESCOTT STATED THAT MR. FARMER IS AN AGENCY NURSE FROM AMERICAN NURSING. MR. FARMER WAS WORKING IN THE E/R ON 5/15-5/16 FROM THE HOURS OF 1900-0730. MS. WESCOTT TOLD SECURITY THAT THE PATIENTS HUSBAND A (CONTRACTED THE DECORITY SUPERVISOR LARRY NURSENDED (CONCERNING THIS MATTER. SECURITY SUPERVISOR KING AND MYSELF SPOKE WITH THE PATIENT AND INFORMED HER WE WOULD STAND BY UNTIL METRO ARRIVED.

AT 0915 HOURS METRO SERGEANT J. CORROL AND OFFICER W. CALHOUN ARRIVED ON PROPERTY. THE METRO EVENT NUMBER FOR THIS INCIDENT # 0805161021.

THE PATIENT WAS MOVED TO ROOM A SECURITY OFFICER HAS BEEN POSTED OUTSIDE HER ROOM. THE OFFICER WILL BE POSTED OUTSIDE HER ROOM UNTIL THE PATIENT IS DISCHARGED.

ON 5/18/08 AT 1540 HOURS THE PATIENT CARDE WAS DISCHARGED

Employees: MURRAY, CHRISTINE Other: BARTLEY LEWIS, BEVERL WESCOTT, LORRAINE

ARCHERRENE REPERSENCE REFERRAL DATA PRESERVICES STRATES DE SECONDES DE

Ref. Date: Ref. from Emp.:

Physicians:

Ref. from Dept.: Ref. to Dept.:

Resp. Expected:

Resp. Received:

PAGE 2

Ref. to Emp.:

Ref, to Other Person:

Reason:

CHH Incident Report00004

9/23/2009 04:20 PM

Universal Health Services RISK MANAGEMENT WORKSHEET CONFIDENTIAL INFORMATION For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

| | | 14 J. | |
|------|--|-------|--|
| MRN: | | | |
| | | | |

Comments:

Action:

Disposition:

TERRESHERRED RISK EXTENDED SCREEN DATA EXTERNATION FOR THE FARMER STREET Date of Dept. Mgr Analysis: 5/22/2008 Inciden Level: Steps taken to investigate: Staffing Level at Time of Incident: N/A Staff Performance Indicators: Agency/Traveler Staff Related Actions taken: Additonal Info sent to Risk Mgr: Y If yes, Information type is: Other (Specify in Comments) Other Information sent to Risk Mgr: Medications Involved: Pharmacy Category-Pharmacy Use Only: Suspected Agent-Pharmacy: Treatment Initiated-Pharmacy use: Equipment/Serial Number (BioMed Number): BioMed Engineering Notified: Body part injured: Category: Date closed: Closed by: Med Error Anal sent to Sup/Dir (CMMC): Falls Analysis sent to Supv/Dir (CMMC)): Comments: Notifications to Administration, Risk, Security occurred at time of notification by patient of alleged sexual assault. Corporate Risk, VHS System CEO notified. PCR completed. [] Douglas Nichols, security officer also entered Midas

ed. V. Johnson

event which has been combined with this one. I Not-

CHH Incident Report00005

TAB 56

| īt . | |) | • ORIGINAL | |
|--|--|--|---|--|
| and the second sec | M | 1 2 3 4 5 | COMP NEAL K. HYMAN, ESQ. Nevada Bar No. 005998 THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 Henderson, NV 89052 Telephone: (702) 939-5234 Facsimile: (702) 939-5235 Attorneys for Plaintiff | FILED DEP 2 12 29 PH'08 CLERK OF THE COURT |
| | | 6 7 8 9 | DISTRICT C CLARK COUNTY | |
| | THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telentone (702) 939-5234 Fassimile (702) 839-5235 | 10 11 12 13 14 15 16 17 | *** ROXANNE CAGNINA, an individual, Plaintiff, vs. CENTENNIAL HILLS HOSPITAL MEDICAL CENTER AUXILIARY, a Nevada Corporation; VALLEY HEALTH SYSTEM LLC; a Nevada Limited Liability Company, VALLEY HOSPITAL MEDICAL CENTER, INC. L, a Nevada Corporation; UNIVERSAL HEALTH SERVICES FOUNDATION, a Pennsylvania Corporation; AMERICAN NURSING SERVICES, INC., a Louisiana Corporation; STEVEN DALE FARMER, an individual; DOE INDIVIDUALS 1 through 10 and ROE BUSINESS OR GOVERNMENTAL ENTITIES 1 through 10, inclusive, Defendants. | COMPLAINT FOR MONEY DAMAGES ARBITRATION EXEMPTIONS CLAIMED: 1. Significant Issues of Public Policy; and 2. Damages Exceed \$50,000.00 CASE NO.: DEPT. NO.: Hearing Date: Hearing Time: |
| CLEAK OF THE COM | SEP 0 2 2008 | 21 22 23 24 25 26 27 28 |) COMES NOW, Plaintiff, ROXANNE CAGN HYMAN of THE LAW OFFICES OF NEAL HYMAN <u>I. GENERAL ALL</u> | EGATIONS rticularly on or about May 15-16, 2008, Plaintiff |

That at all times pertinent hereto, Defendant CENTENNIAL HILLS HOSPITAL 2. MEDICAL CENTER AUXILIARY (hereinafter referred to as "CENTENNIAL") was and is a business 2 entity duly licensed, incorporated and/or regularly conducting business in the State of Nevada, County 3 of Clark, at 6900 N. Durango Drive, Las Vegas, Nevada. 4

That at all times pertinent hereto, Defendants VALLEY HEALTH SYSTEM LLC and 5 3. VALLEY HOSPITAL MEDICAL CENTER, INC. L (hereinafter and collectively referred to as 6 "VALLEY HEALTH") were and are business entities duly licensed, incorporated and/or regularly 7 conducting business in the State of Nevada. 8

That at all times pertinent hereto, Defendant UNIVERSAL HEALTH SERVICES 9 4. FOUNDATION (hereinafter referred to as "UHS") was a business entity duly licensed and incorporated 10 in the State of Pennsylvania and/or regularly conducting business in the States of Pennsylvania and 11 12 Nevada.

That at all times pertinent hereto, Defendant AMERICAN NURSING SERVICES, INC. 5. (hereinafter referred to as "ANS") was and is a business entity duly licensed, incorporated in the State of Louisiana and/or regularly conducting business in the States of Louisiana and Nevada.

That at all times pertinent hereto, Defendant STEVEN DALE FARMER, an individual, 16 6. is and was a resident of Clark County, Nevada, was and is at all times pertinent hereto the agent, servant, employee and/or independent contractor of every Defendant herein working in the capacity as a nurses 18 assistant. Defendant STEVEN DALE FARMER at all times mentioned herein was acting within the scope and course of said agency or employment with the knowledge, permission and consent of all other named Defendants during his course of agency or employment.

That the true names and capacities of the Defendants ROE BUSINESS OR 22 7. GOVERNMENTAL ENTITIES 1-10, inclusive, and DOE INDIVIDUALS 1-10, inclusive, are unknown 23 to Plaintiff who, therefore, sues said Defendants by said fictitious names. Defendants designated as 24 DOE INDIVIDUALS 1-10 and ROE BUSINESS OR GOVERNMENTAL ENTITIES 1-10, and each 25 of them, are owners, administrators, managers, operators, predecessors in interest, successors in interest. 26 parent companies, affiliations, agencies or individuals or entities otherwise in a joint venture with and/or 27 serving as an alter ego to Defendants above-captioned, and/or are individuals or entities responsible for 28

13

14

15

17

19

20

21

the hiring, training, screening, discipline and supervision of the employees, independent contractors or agents of Defendants above-captioned at the time of the events and circumstances alleged herein, and/or are entities responsible otherwise for the handling or transportation of patients. That Defendants designated as DOE INDIVIDUALS 1-10, inclusive, are individuals having ownership and/or control of 4 the subject health care facilities/business entities and/or employees, agents, managers, independent 5 contractors, employers, owners, administrators, individuals otherwise in a joint venture or partnership, 6 who provided or had the duty and responsibility to handle and transport Plaintiff during the events and 7 circumstances alleged herein. Plaintiff is informed and believes and thereon alleges that each of the 8 Defendants designated as ROE BUSINESS OR GOVERNMENTAL ENTITIES and/or a DOE are in 9 some manner negligently, vicariously, and/or statutorily responsible for the events and happenings 10 referred to and caused damages to Plaintiff as herein alleged. Plaintiff will ask leave of this Court to amend this Complaint to insert the true names of such Defendants when the same have been ascertained. 12

Plaintiff puts Defendants on notice that she will move for leave to amend the Complaint 13 8. upon discovery of the true names and identities of each DOE INDIVIDUAL and ROE BUSINESS OR 14 GOVERNMENTAL ENTITY Defendant, and to amend the Complaint upon discovery of additional 15 actionable events, injuries or damages (such as undiagnosed or undetected injuries, future medical 16 treatment or counseling, reckless, wilful, wanton, fraudulent or intentional conduct by Defendants, 17 evasive discovery tactics or spoliation of evidence by Defendants and additional responsible parties who 18 were not known due to Plaintiff not having the care or other records to review or access to Centennial 19 20 Hills Hospital and witnesses).

The degree of reckless, willful, wanton, malicious and/or intentional conduct on the part 21 9. of Defendants is not yet known as discovery has not ensued and all of the care or other records and have 22 not been obtained and Plaintiff does not have access to Centennial Hills Hospital and witnesses. As 23 such, so that NRCP 11 is not violated, Plaintiff reserves its right to seek amendment of this complaint 24 to assert additional claims, causes of action and damages related to reckless and/or intentional conduct. 25

The conduct and acts on the part of Defendants, and each of them, were at all times 26 10. pertinent herein, by and through their employees, agents or independent contractors, were committed 27 while in the agency, employ, joint venture, partnership or assignment of each other Defendant and, 28

1

2

3

11

therefore, Defendants, and each of them, are vicariously, contractually, statutorily (including but not limited to NRS 41.130), or otherwise responsible for the acts and omissions of each other Defendant 2 3 herein.

At all times pertinent herein, the acts, conduct or omissions were of such a nature that 11. persons or entities of ordinary intelligence and prudence, including but not limited to Defendants, could and should have reasonably anticipated and foreseen the conduct, acts or omissions and the probability of injury resulting therefrom.

II. FIRST CAUSE OF ACTION

(General Negligence/General Negligence Per Se)

Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth 11. fully herein.

That at all times pertinent hereto, Defendants, and each of them, and their employees, 12. agents or independent contractors, had a duty to adequately and properly operate a facility providing health care to individuals admitted into said facility and had the duties to adequately and properly supervise, monitor, handle, transport and otherwise ensure the health, safety and well-being of such individuals, in particular, Plaintiff.

Defendants violated laws, statutes, ordinances, codes or regulations related to the caring 13. for, handling of and transporting of patients, including but not limited to criminal offenses of sexual assault and gross or open lewdness.

The aforementioned laws, statutes, ordinances, codes or regulations were designed to 14. protect individuals or patients in public or in hospitals like Plaintiff, and Plaintiff is the type of person those laws were intended to protect.

That on or about May 15-16, 2008, Plaintiff arrived at Centennial Hills Hospital for 15. medical treatment and care. Plaintiff was moved, handled and transported from the emergency room to a hospital room by Defendant STEVEN DALE FARMER who Plaintiff is informed and believes, and thereon alleges, was working as a nurses assistant at the hospital.

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Sulite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

1

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

111

That during the course of Plaintiff's admission to a hospital room at Centennial Hills
 Hospital, and specifically in the process of handling and transporting her to a hospital room, Defendant
 STEVEN DALE FARMER sexually assaulted and raped Plaintiff, and engaged in open or gross
 lewdness.

17. That due to the nature of Defendant STEVEN DALE FARMER's ill character, lack of competence, lack of training, background lack of skill, lack of ability and poor reputation, and lack of proper and effective certification to be a nurses assistant, he was unfit to be employed or utilized as a nurses assistant or in any other capacity, and was unfit to handle and transport Plaintiff.

9 18. That Defendants knew, or should have known, in the course of reasonable investigation
10 or supervision by its managers, employees, agents, independent contractors, supervisors, officers and/or
11 directors, that Defendant STEVEN DALE FARMER was unfit, untrained, unskilled and incapable of
12 properly, competently and effectively handling and transporting Plaintiff.

19. That during the course of Plaintiff's admission to a hospital room, Defendants, and each of them, by and through their employees, agents or independent contractors, abused, sexually assaulted, raped, engaged in open or gross lewdness, neglected, exploited and/or recklessly/intentionally harmed Plaintiff, and negligently, carelessly, recklessly and/or intentionally breached said duties by, but not limited to, the following:

a. Negligence in not providing adequate, proper and effective security for patients,
including but not limited to: lack of security cameras and security personnel, failing to timely contact
authorities, failing to detain STEVEN DALE FARMER once on notice of his acts, lack of proper and
adequate policies, practices and procedures concerning handling and transportation of patients from the
emergency room to hospital rooms (or failure to follow them) and lack of proper and adequate policies,
practices and procedures concerning security or failure to follow them;

b. Negligence in failing to supervise hospital staff, agents, employees and
independent contractors, including but not limited to Defendant STEVEN DALE FARMER;

c. Negligence in failing to hire/screen qualified, trained, able, competent and
reputable staff, agents, employees and independent contractors, including but not limited to Defendant
STEVEN DALE FARMER;

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Partway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235 5

б

7

8

13

14

15

16

Negligence in training and educating hospital staff, agents, employees and d. 1 2 independent contractors;

Negligence in failing to implement or follow accepted, effective and suitable e. 3 policies, practices and procedures, and failing to follow industry standards/standard of care, related to 4 handling and transporting patients. 5

That in light of the facts and circumstances set forth above, the employment or utilization 20. б of Defendant STEVEN DALE FARMER by other named Defendants was done with a conscious, 7 reckless or negligent disregard for the rights, safety or well-being of Plaintiff. 8

That said negligence, neglect and breaches of duty by Defendants, and each of them, 9 21. directly and proximately caused Plaintiff's injuries and damages alleged herein. 10

That as a direct and proximate result of the aforementioned intentional conduct, 22. negligence, carelessness and recklessness of Defendants, and each of them, and their employees, agents or independent contractors, Plaintiff sustained injuries to her body and shock and injury to her nervous system and person, all of which caused and will continue to cause Plaintiff physical, mental and nervous pain and suffering.

As a direct and proximate result of the aforesaid neglect, negligence, carelessness, and 23. 16 breaches of the standard of care of Defendants, and each of them, and their employees, agents or independent contractors, Plaintiff has incurred general and special damages in an amount in excess of Ten 18 Thousand Dollars (\$10,000.00).

That the aforementioned neglect, negligent and careless acts or omissions and failures 20 24. to meet the standard of care of Defendants, and each of them, and their employees, agents or independent 21 contractors were committed while in the agency, ostensible agency, employ, joint venture, partnership 22 or assignment of each other Defendant and, therefore, Defendants, and each of them, and their 23 employees, agents or independent contractors are vicariously, contractually, statutorily, or otherwise 24 responsible for the acts and omissions of each other Defendant herein. 25

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 25. 26 damages described in the prayer for relief. 27

111 28

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89062 Telephone (702) 939-5234 Facsimile (702) 939-5235

11

12

13

14

15

17

1 26. The acts, conduct or omissions alleged herein constitute intentional, knowing, willful, 2 oppressive, reckless and malicious acts/omissions by Defendants, and each of them, by and through their 3 employees, agents or independent contractors, such as to constitute despicable conduct, oppression and 4 malice and such conduct legally entitling Plaintiff to recover an award of punitive damages.

27. That as a direct and proximate result of the neglect, negligence, carelessness, failures to meet the standard of care and/or recklessness of Defendants, and each of them, it has been necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other statute or rule.

III. SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

28. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth fully herein.

29. That as a direct and proximate result of said crimes, acts and terrifying experience as alleged herein, Plaintiff has suffered severe emotional distress and was injured in her health, strength and activity, sustaining injury to her body and shock and injury to her nervous system and person, all and each of which have caused and will continue to cause her physical, mental and nervous pain and suffering.

18 30. Plaintiff's suffering of emotional distress was a foreseeable risk that Defendants, and 19 each of them, by and through their agents, employees and independent contractors, reasonably should 20 have considered or appreciated before engaging in the above stated wrongful, reckless, intentional or 21 improper acts toward Plaintiff.

31. Notwithstanding this knowledge or the fact that Defendants, and each of them, by and
through their agents, employees and independent contractors, knew or should have known such a result
would probably occur, Defendants, and each of them, by and through their agents, employees and
independent contractors, continued or engaged in their course of wrongful, reckless, intentional or
improper acts and conduct as set forth herein.

27 1//

5

6

7

8

9

10

11

12

13

14

15

16

17

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horzon Ridge Parkway, Suite 120 - Heinderson, Nevada 88052 Telephone (702) 939-5234 Facsimile (702) 939-5235

28 ///

The acts of the Defendants, and each of them, by and through their agent, employees or 32. 1 independent contractors, were extreme and outrageous and were intended to cause Plaintiff emotional 2 distress and did, in fact, cause Plaintiff severe emotional distress, proximately causing the damages and 3 4 injuries hereinafter described.

The acts, conduct or omissions alleged herein constitute intentional, knowing, willful, 33. 5 oppressive, reckless and malicious acts/omissions by Defendants, and each of them, by and through their 6 employees, agents or independent contractors, such as to constitute despicable conduct, oppression and 7 malice and such conduct legally entitling Plaintiff to recover an award of punitive damages. 8

As a direct and proximate result of the aforesaid conduct or acts, Plaintiff has incurred 34. 9 and will incur loss of enjoyment of life and pain and suffering all to Plaintiff's general and special 10 damages in an amount in excess of Ten Thousand Dollars (\$10,000.00). 11

That the aforesaid conduct or acts on the part of Defendants, and each of them, by and 35. through their employees, agents or independent contractors, were committed while in the agency, employ, joint venture, partnership or assignment of each other Defendant and, therefore, Defendants, and each of them, are vicariously, contractually, statutorily, or otherwise responsible for the acts and 16 omissions of each other Defendant herein.

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 17 36. damages described in the prayer for relief. 18

That as a direct and proximate result of the acts or conduct of Defendants, and each of 19 37. them, it has been necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute 20 this action, and Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 21 18.010 or other statute or rule. 22

23 24

25

26

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facisimile (702) 939-5235

12

13

14

15

IV. THIRD CAUSE OF ACTION

(Assault and Battery)

Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth 38. fully herein.

111 27

39. Plaintiff was threatened with and apprehended immediate and severe bodily harm and was battered, sexually assaulted and raped by Defendant STEVEN DALE FARMER, and was subjected to open or gross lewdness, while he was employed or utilized by Defendants and while he was handling and transporting Plaintiff to her hospital room at Centennial Hills Hospital, without provocation by her, without justification and without her consent.

40. That the aforesaid conduct or acts on the part of Defendants, and each of them, by and through their employees, agents or independent contractors, were committed while in the agency, employ, joint venture, partnership or assignment of each other Defendant and, therefore, Defendants, and each of them, are vicariously, contractually, statutorily, or otherwise responsible for the acts and omissions of each other Defendant herein.

41. As a direct and proximate result of said assault and battery by Defendants, Plaintiff suffered damages and injuries as herein and hereinafter described in an amount in excess of Ten Thousand Dollars (\$10,000.00).

14 42. The acts, conduct or omissions alleged herein constitute intentional, knowing, willful,
15 oppressive, reckless and malicious acts/omissions by Defendant, such as to constitute despicable
16 conduct, oppression and malice and such conduct legally entitling Plaintiff to recover an award of
17 punitive damages.

18 43. Plaintiff incorporates by reference, as if set forth herein, the particular statement of
19 damages described in the prayer for relief.

44. That as a direct and proximate result of the acts and conduct alleged herein, it has been
necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and
Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other
statute or rule.

24

25

26

1

2

3

4

5

6

7

8

9

10

11

12

13

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

V. FOURTH CAUSE OF ACTION (Negligent Misrepresentation)

9

45. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth

27 || fully herein.

28 ///

Plaintiff is informed and believes that Defendants CENTENNIAL, VALLEY HEALTH, 46. 1 UHS and ANS, at all pertinent times, were and are licensed health care providers engaged in operation 2 of facilities providing health care to individuals admitted into said facilities, and Defendant STEVEN 3 DALE FARMER, upon Plaintiff's information and belief, was a nurses assistant and employee, agent 4 and/or independent contractor of Defendants. 5

Plaintiff is informed and believes that on or about May 16-17, 2008, Defendants 47. 6 negligently made negligent, misleading or false representations to Plaintiff when they represented, 7 suggested or implied that Defendant STEVEN DALE FARMER, a nurses assistant, was certified, 8 supervised, qualified, capable, able, suitable, competent, authorized and trained to handle and transport 9 her to her hospital room. 10

Defendants CENTENNIAL, VALLEY HEALTH, UHS and/or ANS represented that their 48. facilities were safe and that their patients, including specifically Plaintiff, would be handled and transported by certified, trained, qualified, capable, able, competent, suitable, authorized and supervised professionals who would handle and transport her safely and with care and who would not sexually assault/rape their patients or Plaintiff, and who would not engage in gross or open lewdness.

Defendants CENTENNIAL, VALLEY HEALTH, UHS and/or ANS did supply Plaintiff 16 49. with the false, incomplete or misleading information, and made false, incomplete or misleading representations during the course of their business, and intended that she rely on such information or representations when they admitted Plaintiff and employed or utilized Defendant STEVEN DALE FARMER to handle and transport Plaintiff from the emergency room and during transport and admittance to a hospital room.

Plaintiff did rely on the oral and written representations made by Defendants when she 22 50. was admitted to Defendants' medical facility. 23

As a direct and proximate result of the above-described negligent misrepresentations of 24 51. Defendants, and each of them, Plaintiff incurred all of the injuries and damages as alleged herein in an 25 amount in excess of Ten Thousand Dollars (\$10,000.00). 26

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 27 52. damages described in the prayer for relief. 28

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horzon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsintile (702) 939-5235

11

12

13

14

15

17

18

19

20

21

The acts, conduct or omissions as alleged herein constitute intentional, knowing, willful,
 oppressive, reckless or malicious acts/omissions by Defendants, such as to constitute despicable
 conduct, or oppression, fraud, conscious disregard or malice and such conduct legally entitling Plaintiff
 to recover an award of punitive damages.

54. That as a direct and proximate result of the acts or conduct alleged herein, it has been necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other statute or rule.

VI. FIFTH CAUSE OF ACTION

(False Imprisonment)

55. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth fully herein.

56. Defendants' actions, and each of them, by and through their employees, agents or independent contractors, directly or indirectly resulted in the confinement of Plaintiff in an elevator, during transport to her hospital room and/or inside her hospital room.

16 57. When Defendant STEVEN DALE FARMER sexually assaulted and raped Plaintiff, and
17 when he engaged in open or gross lewdness, her liberty was restrained under force or the probable
18 imminence of force and she was not free to leave, and thus was confined against her will in an elevator,
19 during transportation to a hospital room and/or inside a hospital room.

20 58. Plaintiff was detained and confined without her consent or privilege or justification, and
21 was conscious of the detainment and confinement.

22 59. Defendant, and each of them, by and through their employees, agents or independent
23 contractors, acted intending to confine Plaintiff to the elevator or hospital room.

60. That the aforesaid conduct or acts on the part of Defendants, and each of them, by and
through their employees, agents or independent contractors, were committed while in the agency,
employ, joint venture, partnership or assignment of each other Defendant and, therefore, Defendants,
and each of them, are vicariously, contractually, statutorily, or otherwise responsible for the acts and
omissions of each other Defendant herein.

5

6

7

8

9

10

11

12

13

14

15

1 61. Plaintiff was conscious of the confinement and/or was harmed by the confinement and 2 as a direct and proximate result of the confinement suffered damages and injuries as hereinafter 3 described and in an amount in excess of Ten Thousand Dollars (\$10,000.00).

62. The acts, conduct or omissions as alleged herein constitute intentional, knowing, willful, oppressive, reckless or malicious acts/omissions by Defendants, such as to constitute despicable conduct, or oppression, fraud, conscious disregard or malice and such conduct legally entitling Plaintiff to recover an award of punitive damages.

8 63. Plaintiff incorporates by reference, as if set forth herein, the particular statement of
9 damages described in the prayer for relief.

64. That as a direct and proximate result of acts and conduct alleged herein, it has been
necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and
Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other
statute or rule.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:
1. For general damages and loss in an amount in excess of Ten Thousand Dollars (\$10,000.00) to be determined at time of trial;

18 2. For special damages in an amount in excess of Ten Thousand Dollars (\$10,000.00) to be
 determined at time of trial;

20 3. For punitive damages in an amount in excess of Ten Thousand (\$10,000.00) to be 21 determined at time of trial;

4. For reasonable attorney's fees and costs of suit;

5. For pre-judgment and post-judgment interest;

6. For such other and further relief as the Court may deem just and proper, including but
not limited to equitable and declaratory relief;

26 ///

4

5

6

7

14

15

16

17

22

23

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Rige Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

27 ///

28 ///

12

AA2476

7. For leave to amend the Complaint upon discovery of the true names and identities of each
 DOE INDIVIDUAL and ROE BUSINESS OR GOVERNMENTAL ENTITY Defendant, and to amend
 the Complaint upon discovery of additional actionable events, injuries or damages (such as undiagnosed
 or undetected injuries, future medical treatment or counseling, reckless, wilful, wanton, fraudulent or
 intentional conduct by Defendants, evasive discovery tactics or spoliation of evidence by Defendants
 and additional responsible parties who were not known due to Plaintiff not having all of the medical or
 other records to review).

DATED this 2nd day of September, 2008.

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

THE LAW OFFICES OF NEAL HYMAN 241 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 839-5234 Facsimile (702) 839-5235

THE LAW OFFICES OF NEAL HYMAN

Bv NEAL K. HYMAH, ESQ. Nevada Bar No. 005998

Nevada Bar No. 005998 2441 W. Horizon Ridge Parkway, Ste. 120 Henderson, NV 89052 702 939-5234 Attorneys for Plaintiff

Y:\Client Files\Client Files\C\Cagnina3-Centennial Hills\Pleading\complaint FINAL.wpd

Electronically Filed 04/28/2010 11:50:35 AM

CLERK OF THE COURT

| 1 2 3 4 5 6 | ACOM NEAL K. HYMAN, ESQ. Nevada Bar No. 005998 THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 Henderson, NV 89052 Telephone: (702) 939-5234 Facsimile: (702) 939-5235 Attorneys for Plaintiff | CLERK OF THE CO |
|----------------------------|---|---|
| 7 8 | DISTRICT | COURT |
| 9 | CLARK COUNT | |
| 10 11 12 13 | ROXANNE CAGNINA, an individual, Plaintiff, vs. |) FIRST AMENDED COMPLAINT) FOR MONEY DAMAGES)) CASE NO.: A570756) DEPT. NO.: X) |
| 14_ 15 | VALLEY HEALTH SYSTEM LLC dba Centennial Hills Hospital Medical Center; a Nevada Limited Liability Company, | |
| 16 17 | Defendant. | /)) |
| 18 | COMES NOW, Plaintiff, ROXANNE CAG | NINA, by and through her attorneys. N |

19

20

THE LAW OFFICES OF NEAL HYMAN 41 W. Harizon Ridge Parkway, Sulte 120 - Henderson, Nevada 80 Telephone (702) 939-5234 Facsinite (702) 939-5236

2441 W.

COMES NOW, Plaintiff, ROXANNE CAGNINA, by and through her attorneys, NEAL K. HYMAN of THE LAW OFFICES OF NEAL HYMAN, and hereby complains and alleges as follows: I. GENERAL ALLEGATIONS

21 1. That at all times pertinent hereto and particularly on or about May 15-16, 2008, Plaintiff 22 ROXANNE CAGNINA (hereinafter "Plaintiff") was a resident of the State of Nevada, County of Clark. 23 2. That at all times pertinent hereto, Defendant VALLEY HEALTH SYSTEM LLC dba 24 Centennial Hills Hospital Medical Center("Defendant" or "VALLEY HEALTH") was and is a duly 25 licensed, incorporated and/or regularly conducting business in the State of Nevada.

26 3. The conduct and acts on the part of Defendant was at all times pertinent herein by and 27 through its employees, agents or independent contractors and, therefore, Defendant is vicariously, contractually, statutorily (including but not limited to NRS 41.130), or otherwise responsible for the acts 28

and omissions of its agents, agency employees, subcontractors, employees or independent contractors.

4. At all times pertinent herein, the acts, conduct or omissions were of such a nature that persons or entities of ordinary intelligence and prudence, including but not limited to Defendant, could and should have reasonably anticipated and foreseen the conduct, acts or omissions and the probability of injury resulting therefrom.

II. FIRST CAUSE OF ACTION

(General Negligence/General Negligence Per Se)

5. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth fully herein.

6. That at all times pertinent hereto, Defendant and its employees, agents or independent contractors, had a duty to adequately and properly operate a facility providing health care to individuals admitted into said facility and had the duties to adequately and properly supervise, monitor, handle, transport and otherwise ensure the health, safety and well-being of such individuals, in particular, Plaintiff.

7. Defendant violated laws, statutes, ordinances, codes or regulations related to the caring for, handling of and transporting of patients, including but not limited to criminal offenses of sexual assault and gross or open lewdness.

8. The aforementioned laws, statutes, ordinances, codes or regulations were designed to protect individuals or patients in public or in hospitals like Plaintiff, and Plaintiff is the type of person those laws were intended to protect.

9. That on or about May 15-16, 2008, Plaintiff arrived at Centennial Hills Hospital for medical treatment and care. Plaintiff was moved, handled and transported from the emergency room to a hospital room by STEVEN DALE FARMER who Plaintiff is informed and believes, and thereon alleges, was working as a nurses assistant at the hospital. STEVEN DALE FARMER was and is at all times pertinent hereto an agent, servant, employee and/or independent contractor of Defendant working in the capacity as a nurses assistant. STEVEN DALE FARMER at all times mentioned herein was acting within the scope and course of said agency or employment with the knowledge, permission and consent of Defendant during his course of agency or employment.

1 10. That during the course of Plaintiff's admission to a hospital room at Centennial Hills
 2 Hospital, and specifically in the process of handling and transporting her to a hospital room, STEVEN
 3 DALE FARMER sexually assaulted and raped Plaintiff, and engaged in open or gross lewdness.

11. That due to the nature of STEVEN DALE FARMER's ill character, lack of competence,
lack of training, background lack of skill, lack of ability and poor reputation, and lack of proper and
effective certification to be a nurses assistant, he was unfit to be employed or utilized as a nurses
assistant or in any other capacity, and was unfit to handle and transport Plaintiff.

8 12. That Defendant knew, or should have known, in the course of reasonable investigation 9 or supervision by its managers, employees, agents, independent contractors, supervisors, officers and/or 10 directors, that STEVEN DALE FARMER was unfit, untrained, unskilled and incapable of properly, 11 competently and effectively handling and transporting Plaintiff.

12 13. That during the course of Plaintiff's admission to a hospital room, Defendant, by and 13 through its employees, agents or independent contractors, abused, sexually assaulted, raped, engaged in 14 open or gross lewdness, neglected, exploited and/or recklessly/intentionally harmed Plaintiff, and 15 negligently, carelessly, recklessly and/or intentionally breached said duties by, but not limited to, the 16 following:

a. Negligence in not providing adequate, proper and effective security for patients,
including but not limited to: lack of security cameras and security personnel, failing to timely contact
authorities, failing to detain STEVEN DALE FARMER once on notice of his acts, lack of proper and
adequate policies, practices and procedures concerning handling and transportation of patients from the
emergency room to hospital rooms (or failure to follow them) and lack of proper and adequate policies,
practices and procedures concerning security or failure to follow them;

b. Negligence in failing to supervise hospital staff, agents, employees and
 independent contractors, including but not limited to STEVEN DALE FARMER;

c. Negligence in failing to hire/screen qualified, trained, able, competent and
 reputable staff, agents, employees and independent contractors, including but not limited to STEVEN
 DALE FARMER;

3

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

d. Negligence in training and educating hospital staff, agents, employees and
 independent contractors;

e. Negligence in failing to implement or follow accepted, effective and suitable
policies, practices and procedures, and failing to follow industry standards/standard of care, related to
handling and transporting patients.

6 14. That in light of the facts and circumstances set forth above, the employment or utilization
7 of STEVEN DALE FARMER by Defendant was done with a conscious, reckless or negligent disregard
8 for the rights, safety or well-being of Plaintiff.

9 15. That said negligence, neglect and breaches of duty by Defendant directly and proximately
10 caused Plaintiff's injuries and damages alleged herein.

11 16. That as a direct and proximate result of the aforementioned intentional conduct, 12 negligence, carelessness and recklessness of Defendant, and its employees, agents or independent 13 contractors, Plaintiff sustained injuries to her body and shock and injury to her nervous system and 14 person, all of which caused and will continue to cause Plaintiff physical, mental and nervous pain and 15 suffering.

16 17. As a direct and proximate result of the aforesaid neglect, negligence, carelessness, and
breaches of the standard of care of Defendant, and its employees, agents or independent contractors,
Plaintiff has incurred general and special damages in an amount in excess of Ten Thousand Dollars
(\$10,000.00).

18. That the aforementioned neglect, negligent and careless acts or omissions and failures
to meet the standard of care of Defendant by its employees, agents or independent contractors, were
committed while in an agency, ostensible agency, employ, joint venture, partnership or assignment and,
therefore, Defendant is vicariously, contractually, statutorily, or otherwise responsible for the acts and
omissions of STEVEN FARMER.

Plaintiff incorporates by reference, as if set forth herein, the particular statement of
damages described in the prayer for relief.

4

28 ///

27

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Suite 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

The acts, conduct or omissions alleged herein constitute intentional, knowing, willful, 20. 1 oppressive, reckless and malicious acts/omissions by Defendant, by and through its employees, agents 2 or independent contractors, such as to constitute despicable conduct, oppression and malice and such 3 conduct legally entitling Plaintiff to recover an award of punitive damages. 4

That as a direct and proximate result of the neglect, negligence, carelessness, failures to 21. 5 meet the standard of care and/or recklessness of Defendant, it has been necessary for Plaintiff to retain 6 THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and Plaintiff is entitled to recover 7 reasonable attorney's fees and costs pursuant to NRS 18.010 or other statute or rule. 8

III. SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth 22. fully herein.

That as a direct and proximate result of said crimes, acts and terrifying experience as 23. alleged herein, Plaintiff has suffered severe emotional distress and was injured in her health, strength and activity, sustaining injury to her body and shock and injury to her nervous system and person, all and each of which have caused and will continue to cause her physical, mental and nervous pain and 16 suffering.

Plaintiff's suffering of emotional distress was a foreseeable risk that Defendant, by and 24. 18 through its agents, employees and independent contractors, reasonably should have considered or 19 appreciated before engaging in the above stated wrongful, reckless, intentional or improper acts toward 20 Plaintiff. 21

Notwithstanding this knowledge or the fact that Defendant, by and through its agents, 25. 22 employees and independent contractors, knew or should have known such a result would probably occur, 23 Defendant, by and through its agents, employees and independent contractors, continued or engaged in 24 its course of wrongful, reckless, intentional or improper acts and conduct as set forth herein. 25

- 111 26
- HI27
- 111 28

THE LAW OFFICES OF NEAL HYMAN 41 W. Horizon Ridge Parkway, Sulte 120 - Henderson, Neveda 88052 Telephone (702) 939-5234 Factorinile (702) 939-5235 2441 W.

9

10

11

12

13

14

15

17

AA2482

The acts of the Defendant, by and through its agent, employees or independent 26. 1 contractors, were extreme and outrageous and were intended to cause Plaintiff emotional distress and 2 did, in fact, cause Plaintiff severe emotional distress, proximately causing the damages and injuries 3 hereinafter described. 4

The acts, conduct or omissions alleged herein constitute intentional, knowing, willful, 27. 5 oppressive, reckless and malicious acts/omissions by Defendant, by and through its employees, agents 6 or independent contractors, such as to constitute despicable conduct, oppression and malice and such 7 conduct legally entitling Plaintiff to recover an award of punitive damages. 8

As a direct and proximate result of the aforesaid conduct or acts, Plaintiff has incurred 28. 9 and will incur loss of enjoyment of life and pain and suffering all to Plaintiff's general and special 10 damages in an amount in excess of Ten Thousand Dollars (\$10,000.00). 11

That the aforesaid conduct or acts on the part of Defendant, by and through its employees, 29. 12 agents or independent contractors, were committed while in an agency, employ, joint venture, 13 partnership or assignment and, therefore, Defendant is vicariously, contractually, statutorily, or 14 otherwise responsible for the acts and omissions of STEVEN FARMER. 15

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 30. 16 damages described in the prayer for relief.

That as a direct and proximate result of the acts or conduct of Defendants, and each of 31. 18 them, it has been necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute 19 this action, and Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 20 18.010 or other statute or rule. 21

IV. THIRD CAUSE OF ACTION

(Assault and Battery)

Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth 32. 24 fully herein. 25

Plaintiff was threatened with and apprehended immediate and severe bodily harm and 33. 26 was battered, sexually assaulted and raped by STEVEN DALE FARMER, and was subjected to open 27or gross lewdness, while he was employed or utilized by Defendant and while he was handling and 28

17

22

transporting Plaintiff to her hospital room at Centennial Hills Hospital, without provocation by her,
 without justification and without her consent.

3 34. That the aforesaid conduct or acts on the part of Defendant, by and through its employees,
agents or independent contractors, were committed while in an agency, employ, joint venture,
partnership or assignment and, therefore, Defendant is vicariously, contractually, statutorily, or otherwise
responsible for the acts and omissions of STEVEN FARMER.

7 35. As a direct and proximate result of said assault and battery by Defendant, Plaintiff
8 suffered damages and injuries as herein and hereinafter described in an amount in excess of Ten
9 Thousand Dollars (\$10,000.00).

10 36. The acts, conduct or omissions alleged herein constitute intentional, knowing, willful, 11 oppressive, reckless and malicious acts/omissions by Defendant, such as to constitute despicable 12 conduct, oppression and malice and such conduct legally entitling Plaintiff to recover an award of 13 punitive damages.

14 37. Plaintiff incorporates by reference, as if set forth herein, the particular statement of
15 damages described in the prayer for relief.

38. That as a direct and proximate result of the acts and conduct alleged herein, it has been
necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and
Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other
statute or rule.

V. FOURTH CAUSE OF ACTION

(Negligent Misrepresentation)

39. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forthfully herein.

40. Plaintiff is informed and believes that VALLEY HEALTH at all pertinent times, was and
is licensed health care providers engaged in operation of facilities providing health care to individuals
admitted into said facilities, and STEVEN DALE FARMER, upon Plaintiff's information and belief,
was a nurses assistant and employee, agent and/or independent contractor of Defendant.

7

28 ///

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Sulte 120 - Henderson, Nevada 88052 Telephone (702) 939-5234 Facsimile (702) 939-5235

20

1

2

3

4

5

41. Plaintiff is informed and believes that on or about May 15-17, 2008, Defendant negligently made negligent, misleading or false representations to Plaintiff when it represented, suggested or implied that STEVEN DALE FARMER, a nurses assistant, was certified, supervised, qualified, capable, able, suitable, competent, authorized and trained to handle and transport her to her hospital room, and was a direct hire employee of VALLEY HEALTH.

42. 6 Defendant VALLEY HEALTH represented that its facilities were safe and that its 7 patients, including specifically Plaintiff, would be handled and transported by certified, trained, qualified, capable, able, competent, suitable, authorized and supervised professionals and employees who would handle and transport her safely and with care and who would not sexually assault/rape their patients or Plaintiff, and who would not engage in gross or open lewdness.

43. Defendant VALLEY HEALTH, did supply Plaintiff with the false, incomplete or misleading information, and made false, incomplete or misleading representations during the course of its business, and intended that she rely on such information or representations when it admitted Plaintiff and employed or utilized STEVEN DALE FARMER to handle and transport Plaintiff from the emergency room and during transport and admittance to a hospital room.

44. Plaintiff did rely on the oral and written representations made by Defendant when she was admitted to Defendant's medical facility.

18 45. As a direct and proximate result of the above-described negligent misrepresentations of 19 Defendant, Plaintiff incurred all of the injuries and damages as alleged herein in an amount in excess of Ten Thousand Dollars (\$10,000.00).

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 46. 22 damages described in the prayer for relief.

47. The acts, conduct or omissions as alleged herein constitute intentional, knowing, willful, 23 oppressive, reckless or malicious acts/omissions by Defendant, such as to constitute despicable conduct, 24 25 or oppression, fraud, conscious disregard or malice and such conduct legally entitling Plaintiff to recover 26 an award of punitive damages.

28 111

27

20

21

AA2485

48. That as a direct and proximate result of the acts or conduct alleged herein, it has been
 necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and
 Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other
 statute or rule.

VI. FIFTH CAUSE OF ACTION

(False Imprisonment)

49. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth fully herein.

9 50. Defendant's actions, by and through its employees, agents or independent contractors,
10 directly or indirectly resulted in the confinement of Plaintiff in an elevator, during transport to her
11 hospital room and/or inside her hospital room.

12 51. When STEVEN DALE FARMER sexually assaulted and raped Plaintiff, and when he 13 engaged in open or gross lewdness, her liberty was restrained under force or the probable imminence 14 of force and she was not free to leave, and thus was confined against her will in an elevator, during 15 transportation to a hospital room and/or inside a hospital room.

52. Plaintiff was detained and confined without her consent or privilege or justification, and
was conscious of the detainment and confinement.

18 53. Defendant, by and through its employees, agents or independent contractors, acted
19 intending to confine Plaintiff to the elevator or hospital room.

54. That the aforesaid conduct or acts on the part of Defendant, by and through its employees, agents or independent contractors, were committed while in an agency, employ, joint venture, partnership or assignment and, therefore, Defendant is vicariously, contractually, statutorily, or otherwise responsible for the acts and omissions of STEVEN FARMER.

55. Plaintiff was conscious of the confinement and/or was harmed by the confinement and as a direct and proximate result of the confinement suffered damages and injuries as hereinafter described and in an amount in excess of Ten Thousand Dollars (\$10,000.00).

27

28 ///

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Sulte 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235 5

6

7

The acts, conduct or omissions as alleged herein constitute intentional, knowing, willful, 56. 1 oppressive, reckless or malicious acts/omissions by Defendant, such as to constitute despicable conduct, 2 or oppression, fraud, conscious disregard or malice and such conduct legally entitling Plaintiff to recover 3 an award of punitive damages. 4

Plaintiff incorporates by reference, as if set forth herein, the particular statement of 57. 5 damages described in the prayer for relief. б

That as a direct and proximate result of acts and conduct alleged herein, it has been 7 58. necessary for Plaintiff to retain THE LAW OFFICES OF NEAL HYMAN, to prosecute this action, and 8 Plaintiff is entitled to recover reasonable attorney's fees and costs pursuant to NRS 18.010 or other 9 10 statute or rule.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

For general damages and loss in an amount in excess of Ten Thousand Dollars 1. (\$10,000.00) to be determined at time of trial; 14

For special damages in an amount in excess of Ten Thousand Dollars (\$10,000.00) to be 2. 15 determined at time of trial; 16

For punitive damages in an amount in excess of Ten Thousand (\$10,000.00) to be 3. 17 determined at time of trial; 18

> For reasonable attorney's fees and costs of suit; 4.

For pre-judgment and post-judgment interest; 5.

THE LAW OFFICES OF NEAL HYMAN W. Horizon Ridge Parway, Suite 120 - Henderson, Nevada 89052 W. Floeddione (702) 939-5234 Facisimile (702) 939-5235 2441 W

11

12

13

19

20

21

22

23

24

25

26

27

28

111

111

111

111

AA248

1 6. For such other and further relief as the Court may deem just and proper, including but 2 not limited to equitable and declaratory relief;

DATED this 28th day of April, 2010.

THE LAW OFFICES OF NEAL HYMAN

NEAL K. HYMAN, ESQ. Nevada Bar No. 005998 2441 W. Horizon Ridge Parkway, Ste. 120 Henderson, NV 89052 702 939-5234 Attorneys for Plaintiff

б

-8

CERTIFICATE OF E-SERVICE AND E-FILING 1 Pursuant to NRCP 5(b) I certify on this 28th day of April 2010, I e-filed and served the foregoing 2 FIRST AMENDED COMPLAINT FOR MONEY DAMAGES on all parties to this action by way of e-3 service and e-filing through Wiznet.com to the following recipients on the E-Service Master List fo 4 5 Case: 6 Hall Prangle & Schoonveld 7 **Contact Email** Audrey Stephanski astephanski@hpslaw.com 8 Hall Prangle & Schoonveld, LLC 9 **Contact Email** 10 David P. Ferrainolo, Esq. dferrainolo@hpslaw.com 11 The Law Offices of Neal Hyman 12 **Contact Email** Deanna L. Slominski, Paralegal deanna@lawyerinvegas.com 13 Neal K. Hyman, Esq. neal@lawyerinvegas.com Rhonda R. Long, Esq. rhonda@lawyerinvegas.com 14 15 16 By: An employee of The Law Offices of Neal Hyman 17 18 19 Y:\Server Documents\Client Files\Client Files\C\Cagnins3-Centennial Hills\Pleading\first amended complaint.wpd 20 21 22 23 24 25 26 27 28 12

THE LAW OFFICES OF NEAL HYMAN 2441 W. Horizon Ridge Parkway, Sulte 120 - Henderson, Nevada 89052 Telephone (702) 939-5234 Facsimile (702) 939-5235

TAB 53

|| >

.1

Centennial Hills Hospital

"SECURITY DAILY ACTIVITY LOG"

| Date | Shi | ft Officer | Officer | Officer | Supervisor |
|--|--|---|---|---|--------------------|
| | | | | | |
| Contraction of the local division of the loc | End | Activity Performed | | Watth Million and State II. | |
| 50700 | | ACTE AMETION CUMMINGHA | 日本内部各部計算におりに直部に任 | | |
| | | | 至出现的心理:2014年3月14日2月13月25日5 | | |
| and the second second second second second | | NOT GAMEER FRAME STREET | | | |
| THE REAL PROPERTY AND ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDR | PARTY OF THE | and a life in a first of or a tan at a life ta back | HILLS OT ALL STATES TO LEAD THE | 篇1939 新 书版和思密 | |
| | | | *1 | 医结节耳角 常常温度 机压印刷 计印度 | |
| | | NURSESSIATION PATIEN | | HEEDLEUWA | JONIROGM - |
| | F S F F III III III | Fillale (Istate at a state of the state of | 医胆清黄色 装饰的 网络白花形式 化涂焊塑料 | | |
| | CALLS AND | | THE PARTY OF THE PARTY OF THE | 1959.1111名的形式1910年 | |
| | | | | | |
| | | THE FIRE ALL RECOMPANE AND DESK PRE ADMIT RESIDE WATTING AREA CONTRISECT | 接到公司的目标和自己的问题。 | | |
| 0305 | 17:17部書 | N NEEDA (12 5 16 (0) ; 45 5 5 (0) | | | |
| Contraction and a service of the ser | A STATISTICS AND A STATIS | INFOGREDIDIORUMCEBU ASSISTANDRSEWATTERM | | BEINGUNGOO | |
| The formation of the | nania | 111110 (F. + 1919) 0) 0] . + 10 01 - 0 | DISTRICT, WITH DISTRICT MET | | |
| ND.ALIMETERSTERSTERSTERSTERSTERSTERSTERSTERSTER | 020 | den HEINKHONING SHUSP | AIR WIELE WAS A FASSEA | | |
| 10240 | | WERKINCTON HR PARAN MILEICICENTON PREPARA | Talling and the old by (of the balline) | AFE | |
| Contraction and the state | TOOD | GODE PINKGONSOUT | ARMER WAS AFAUSEAU | TRANSVESED :: | |
| | | MOERING TONIFIC ALARM NTERIOR PLATEO ECHINE | | | |
| TOUS | | | 清成2期的现在的局部的的外班至0.6%本 | 目的影响目前的意思主 | |
| | | | | | |
| | | 20月前日19月61~21日月11日日11日11日 | | Contraction of the second second second | |
| | | | | | |
| | | | | | |
| | | CATE LABS [OFAGE FFF ONE 8 TWO SOUTH MAGE TYO FOIL AS ILLIER SO | | | |
| | | TEX TING DOOR K | | | |
| THE PARTY AND INCOMENDED IN THE | | | | | NE THE SHOOL DI |
| 1045 | | INTERIOR PACKO SEGUE ELOGERN/OMENISICENTER | | | |
| | | | | | PATENTROOMS |
| | | | | NS 21 BUD 774 | TING AREAS AND ALL |
| | NAME AND ADDRESS OF TAXABLE PARTY | | | Mining Scheme 2 10 100 | |
| | | | 医生物 动脉组织 新闻的 前面的 动物能信 禁 计 服品管 | PHE LEPISTIC AND STREET | |
| | | NUESESES ATTONEDATEN NUESESES ATTONEDATEN NUESESESTATIONEERIKGE | 自己の前面に推進しまたは、お話の合いにはとい | | |
| | | | PLTF'S PROPOS | | |
| | | | | i | SDAL001 |
| | | | EXHIBIT # 2 | ł | |

 400

| Page 2 of 2 | | 5/22/2009 - 2:45 PM |
|-----------------|--|---|
| 1200 11215 | | |
| | ADMITTING BOBBY LOSS CONTROL CASE MANAGEMENT SCHEDULING TNA ELECTRICAL ROOM AND ASSIDRACE ROOM WAIN LOBBY ADMITTING DONG | |
| | ELECTION OF COMENCESSION AND ASSERVED REPORTS TO AN SOLUTION OF THE AND SUBCEBUL TRESK PREADMIN RESPINE DIAGNOSTICIANS IN FICT PARENTS URCEBUL VANTING AREA GIFTISE OPPOSITATE WEDDE STAND THE MOTORS ELECATORS | |
| 新P20章 副400 | | |
| | WEST EIR PARKING AREA MANY COBBY CIRCEBER MELERE DONEROL KOOM SOUTEWEST MAIN LOEPY FARKING MED OAL OFFICE BUILDING WESTID YOR | a state of the second se |
| | | |
| | WEST LOBBY CATE OFFICE SITTING AREA GENERATORS ON IGEN BLOBA DOCK MATERIALS WANAGENEN, DOOK AREA ER AMBDUANCE BAT MORTE | |
| | PARK NG AREA | |
| 新 山 前22年 | SEGURITY PERFORMED AN INTERIOR PATROLIGHTHELIOPTH AND SOUTH HE INCRITED FRANCICE THEATMENT BOOM #536 20 TEMS WORKSOM AMELIA | |
| | | |
| | DAURSES STATION TRIAGE ON ENVIOLUTERE AND FREICONBULTRATION ROOM | |
| 設計が登録すて担 | RYS'NE REVEALED SHELLS HERE ENDER AND | E CONVERSION |
| | INTERIOR FATROL SECURIT PERFORMED AN INTERIOR PATROL ON THE SECURITY FOR TO AVAILABLE AND A SECURITY FOR TO AVAILABLE AV | |
| | AREA AND NURSING STATIONS PUBLIC RESTROOMS PATENER/OMS 220 | Innerted Hatthautherherhults |
| | | ASAND AL |
| | | HENVEEPE |
| | | |
| NADE - | SOTEUNNINGHAM CORROAND HANNION DULY ADVISED THEM ON ALL SEC MATTERS PASSED ON ALL KEYS AND RADIOSTER THEM. | |
| | STOLYAMPTON AND SUBJEVISOR KINGTOREDURA | |
| | | |

| LIN VI DINIL ACUTICAS | | |
|-----------------------|--|--|
| | The stant | |
| | | |
| | | Farmen Frankler Michael Comment |
| TON THE REAL OF | | |
| | The shoes again the | |
| 6976 539 | Heleogen= | |
| | PROPERTY OF STREET, ST | |
| | | E A VEDEREELSE |
| | | SHEEK NAMARRAN NAMAR |
| | Lost & Fourse Ext | Managine en and the second |
| | HIM MANER JEHORA | |
| | | |
| Starsundhal | | |

Centennial Hills Hospital MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

| Date | Shi | ft Officer | Officer | Officer | Supervisor |
|--|--|--|---|--|---|
| | | ANN EXTRAGATOR | | eensee | |
| Start 1500 | End | Activity Performed | W. Y. W. BITTTITTETTETTETT | | |
| | | | ISCOUNNING TAMONOUL THE DAY PART AND STAND | Keyona a a a a a a a a a a a a a a a a a a | R TO 2 ²⁴ SHE |
| | | TEN DIVALUABILES | | | |
| the second state of the se | TE OUR DO |)==[@==;=@=];!?(*)[[\$\$\$ | A DULED A HELSA W. CALLES N | HENDING SUGES | |
| | Fill P | | | | |
| | | | | | |
| | | | OURTTY PERFORMED AN INT YOMINIS BATION, MAISSET | 化超增长的副辩修的犯罪的。 | |
| | | | | | |
| | | | REORMANCE MEROVEMEN RENCE ROOM ONE & TWO E & TWO AND THE HILLS CAFE | | |
| | | VORACETROOM20NEL | SINVEX NETTE HESIONES NVALUSE AREAGON INAC | | CSTATIONS |
| | | | | | |
| | | PURIORALSTIROEMS | VATINGARES OF TEAC ATTENT BOOMS#201225 AGE AREAS PATENT ROOM PUBLICIWATING AREAS AND | NURSESSIATI | ð) <u>)</u> S |
| | | | | | R09M |
| | | | 行动;FEADMAD:2013) 金银石(電力) 医乳化的 网络自己营营 | | |
| | | | | | |
| | 2225666666666777 | 「「「「「「「「「「「」」」」」「「「」」」」」「「」」」」」」」」 | ADING DOCK MATERIALS M THVESTER PARKING AREA | いた (10) 同時 (10) 日本 (10) 10) (10) (10) (10) 10) (10) (10) (| |
| | | | | | |
| | | | CURITY PERFORMEDIAN IN ADMINISTRATION MARKET | | |
| | CONTRACTOR OF A DESCRIPTION OF A DESCRIP | where of a constrained with which the second state | "我是我们的你的你的你的你?"我们们可以认为我们的父亲,我们的人们没有 | | |
| | | | | | |
| | | SHOR (CEREODOMEON) | | | |
| | 用编辑这种情况 | 化化学化学中期 网络美国安美语专利利托特州新疆 | 对:22.83.1.1.1.2.2.2.0.用母:2.3.3.4.8.0.1.1.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4 | | |
| | | | | | |
| | 和目標的方法。 | THEST POLICY SERVICE | EE PARKING, CALE OUTSID ADING DOCK, MATERIALS M | | |
| | | AMELULANCEEBAY | | | MACHERARIA NCI |
| SOUTH STATE | | | EDPASSIONANCE CERTING IN | | |
| 1800 | | VIGER Nº DEIDRUSERI | RINGERREDINGERSIDE | | |
| 178402 | HFY WY EE D | AN PHER AND AND AN AND AN AND AND AND AND AND A | | | |
| | | | | DE MARE COMPLETE STIDE | $F_{i}(x = f(x) \phi) \in \mathcal{F}_{i}(x)$ |
| | | | IENT RODINGLEGULESSE GOLE WAITING AREAS AND ALEUNU | RSESISTATIONS. | |
| | and Address of the second second | A CONTRACTOR OF CO | | | SDALO |

12.

5/22/2009 - 3:07 PM

| Page 2 of 3 | | 5/22/2009 - 3:07 PM |
|--|---|---|
| | EXTERIORAR ATROPHSEOURIES FLEXADRMIEDVAN EXTERIOR PANISOLUCIR CONTROL CONT | |
| | | |
| | MISTORPARKING AREA LAST DOCTORS COVERED PARKING MEDICAL CELC WEST LOEBY EMPLOYEE PARKING OAFE OUTSIDE STUNG AREA GENERATO | |
| | 底电方或线导流与是名性全力之外,有台湾都近电技的的行便用的(电)电子曲型完全提出自己和低度的变化的 <u>学习之力,但是不可能的情况。</u> 是是是不是能能能 | |
| | AMBULANCE BAYE NORTHWEST ER PARKING AREA MONITORED EMPLOYEER | |
| 19501 2000E | IN TERIOR PARTNERS SOUR IN REPORT OF AN INTERIOR 22 MERCING STRATEGY AND A | E HEI EDINICIE |
| | NIGUTOINCE FERRER AND | |
| | HEARING CONTRACTOR AND A DISTORT OF A DIST A DISTORTA DISTORT OF A DIS | |
| particular instantion in the second second | SIGK-MAMBERCEROSHEDINEA/REO/TEEVOTERENGEREARDEROMONA REALE | |
| 2010 2030 | EINANGIAI SEEMCESTADMINISTRATION BARKETING STATETISANING BUMA | |
| | RESCURCES NURSE STAFFING ADMINISTRATION CONFERENCE DENTER EM TRALTH SERVICES PERFORMANCE IMPROVEMENT INTECTION CONTROL RE | |
| | 医多方因为抗溃疡 医治疗法律过度 化盐酸盐 医胆酸盐 肥胖 经营销 新闻的 化盐酸化物盐酸化物盐酸盐 医胆酸盐 医心心 医心心 化化化化化化化化化化化化 | |
| | STORAGE ROOM ON F& TWO AND THE HILLS GARE 200 FLOOR WOMEN'S DEN AND DELINERY PUBLIC WAI INGTAREA O'R LIRIACE AREA ALL NURSING STA | TONS |
| | SAUBIO A SUROOMS 22 AUENTEREROMS 2200 22 | |
| 5215115 1211211 | PEOLONED ECHIERDIOIONEN EN PHEOLOGY EN | |
| | | |
| | NURSEASSIST, A GUEST WAITING INCERTOBEY TO TRIACEP PASSED OUT AN THE ELOOR SECURITY ASSISTED FROM A PROPERTING PATIENT ONTO GUENEY | |
| | | |
| 100 F1701 | INTERIOR PATROLOF THE LOADING DOCK HALLWAY BED STOFACE (HIN)? ENGREERING CONTRACTORY INTO A PARTOPHERY STORAGE WAINTENANCE | |
| | | |
| | CENTRAL STORAGE DESONTAY PHORMACY PRARMACY DISTRIBUTION ME RECORDS LAB MEDICAL STATE DEBVICES PERCIPAL REOMINFORMALCY | |
| | 测试数据合当为异的分析机合相合同自己是用的方法处理图形的自分性推进力量。当时的指令和问题性实现已是相差于正式 | |
| | & FEMALE LOCKERS, DIAGNOSTIC IMAGING INFALTENT HOLD TUDBOSCOPY OATHLAGSTORAGE ECHG EKGINEWING ROOM CATHLAB MRI SEECIA PL | 이 문서가 좀 되었다. 아이트(이)는데? |
| | 准确的问题,我们就是一些问题,我们们就是这些事件,我们就是一些事件,我们就是这些事件,我们还是一些,我们就是这些事件。""你们,我们就是是不是一个。" 第1997年,我们就是一些事情,我们们就是这些事情,我们就是一些事情,我们就是这些事情,我们就是一些事情,我们就是不是一些事情,我们就是不是一些事情,我们就是一些 | and an end of the second of the second se |
| | TWO HOT AF ULTRA SOUND ONE & TWO STORAGE ROOM W RECEARCES | |
| 22005 0245 | EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL LEIRCIRO WESTER PARKING AREA MAN LOBBY SIRCE EDRIVE PRESONTROL ROOM | eorive. Ut |
| | | SOURH . |
| | VISITOR PARKING AREA EAST DOCTORSICOVERED PARKING MEDICAL OF M WEST LOBBY EMPLOYEE PARKING WARE OUTSIDD SITTING AREA GENERALD | |
| | | 28 |
| | AMBULANISE BAY NORT IWEST E/R PARKING AREA MONTORED EMPLOYES | |
| | INTERIOR AND RESERVED AND REPAIR DURING AND REPAIRS OF CONTRACTOR | SPH20/OF MA |
| | FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMA RESOURCES NURSEBUALTING ADMINISTRATION CONFERENCE CENTER EM | |
| | 他总法修算重新自己的认识可在重点更可以必须到到这时间的问题的知道,但以他都必需要给到的方面能的方面能的,并且给助相性的 | |
| | IMANAGEMENT CONFERENCE RECOMMENTATION EDUCATION SOUTH RESIR STORAGE ROOM ONE & INCAND THERE US GARAGE? FILLER WOMEN SIZEN | |
| | AND DETMERY PUBLIC WAITING AREA O'R TRIACEAREA AL SUBSING STA RUBLIC RESTROOMS TRATENT ROOMS # 201925 THE 2 T 4 TO THAT AN | |
| | | 6 801-836 |
| | PUBLIC RESTROOMS DOE NO WATTINE AREAS AND A STURSES SUPPORTS (D) | |
| | EST CANDER STORATORICA TO THE AND THE AND THE AND THE COMPANY AND THE AND THE AND THE AND THE AND THE AND THE A | |
| | | · |

5/22/2009 - 3:07 PM

Page 3 of 3 End of Shift Activities Total

· · ·

| | ANNE ESCOLOLIER OF CANA | - and good and and a second second |
|---|--|------------------------------------|
| Store Blief Blief | Forencie | |
| | | |
| | Heliooper - Helio | Storen van de staten st |
| Sold State Frank | | |
| | | |
| DENTIFICE | entro ser Mehiole - | |
| | The second s | |
| of its a state of the state of | | |
| Elle Dell'hourse ser | | |

ŕ,

A.,

Centennial Hills Hospital

"SECURITY DAILY ACTIVITY LOG"

| Date | Shift | Officer | Officer | Officer | Supervisor |
|-------------------------|------------------------------------|--|---|---|--------------------|
| 5 371-00134 | | NETTIN | THE REPORTS | | |
| | End Activ | ity Performed | | | |
| | SIC CA | | AND SO ENK CHEOK | | ESINTHE SALE (5) |
| | ALL DONES | ADDE SERVICES ON | THE SAFELING | | |
| | CENTRE INSTREMENTS | IN THE WORK OF THE WAY | ADFRICERISTATIONED | IS AN ADD BEN DE AN | |
| | | TOP A TO A HANA DO | a) hateles is seen as the seen as | 日外教育:(01年)、2世君相当日 | |
| | | 127 ADMIERNG | RIAGE 1 & 2. E/R CONSI 9, #40 AND #41 MEDIC | I E FATIND DE RECLEMENTAL | |
| | Selling Selling | HEING OFFICE GAS | E MANACEMENTEDEL | H=HERRIC STREET | FEIGE MAINLOBBY |
| | MAINE | JEBY ADMININGS | NHONSKIHELSU19 | | |
| | | | | 11741172-19/4S1E 91-249 | |
| | | | MESEAND VETUK GISL SIBED WATHOUT ALGIS THE FARMADOLORS FOR | | 61RS: UMARCAN PARA |
| | | ALL STREET, ALL | o volten zolo za svenec | 日本1993年1996月1日開始 | PARANUSE REPORTS |
| | | The second states of the second states and t | | 用新作用的新闻的目录和自己把自己 | |
| | SCHED | | ST 121 AND AN INTERNO | 1 11 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 | |
| | 위에 바라 비행들이 많은 것이 다 같이 물었다. | 化化物学学家 网络小花 机化合合物 网络白色 化合体化合金 | 王统,如此行动,以"小说和你们可能」的"把我,我们们的说 | 计计算法 医鼻骨骨 计可能 网络马拉马马马拉马马 | |
| | CARE | INITS PRE & POST | NSUEPATION ROOM | NE GESTREEN AL | BATIENTERODING |
| | Filler Brief Divis | (0)为住用当时在为15组(6)为月常只要到 | ECONTROL ROOM SI | | |
| | | E HOLDING MAILER | | BANGIO ANG DINING | MEDICPUL |
| | IN CANING | | MAINELEVATORS M FENGIOPENE MARKE | 「「「「「「「「「」」」」「「」」「「」」」「「」」」」「「」」」」」」」 | |
| | | STRATION MEEDES | 276 700 <i>078 ₩9ΜΕ</i> ₩S AREA: R#10MS 201 1101 | 准时可。1995年中国中国的建国 | |
| | | OB RCEMS 60463 | | 计推动影响 计算机电话 计正 确的 计正确的 计正确的 计算机 | |
| | HERE AND | AITING AREAS CHE | DKED-CODE4-OFEICE | RIALSO MONITORED. | THEEREN RANGED |
| 0205 | NET-E Seed | SISTEPADMIEINO ORIZATROEWASI | SINIAL STREET, STRE | DEPAGRING AREASI | AURENNERNE |
| | | INS AMBULANCE | NTRANCE HELIPAD | OADING DOICKEBENI | |
| | | ORAGODE454TTH | | | |
| 10/27/2 | men Ellern't | THE WITH THE PARTY NEWS POINT | TARMIDOIDESTRORINIC ONDUCTEDIDEEMERC | | |
| | | I PARA INTENSE | PACE 12 2 ERGONS | 时用实用现及自然可是内部的公 | |
| | HERRICH HERBYD) Y L | 学校的事件和"监察学校 | KE#40 AN DE#29 MODU | 理论语言言的意义可以注意扩展 | |
| | 101 jan 12 gr - 11 V 2 st 13 st 12 | 1970月10月11月11月11日日11日1日日 | E MANAGEMENTEDEL MATIONS A HIRUSEOU | | |
| IN THE REAL PROPERTY IN | | DENERTODOGRA | OFTOM THE FRAME AND OF | | ANDES EST |
| | E BORTI | MUSHAMBUHANGE | 到处理经验的资产的引发用 12次中端用 | | |
| | COOL | VC HOWER'S ISTAC | TENTRANCE DIEDARY | | |
| | | | | Ing and the second state of the | |

| 5/2 | 2/20 | Ю9 | -3 | :23 | P٨ |
|-----|------|----|----|-----|----|
| | | | | _ | _ |

| Page 2 of 2 | J/22/2007 - 5.25 1 |
|---|--------------------------------------|
| | |
| | |
| | |
| | |
| MAIN LOBEY ADMITTING STATIONS & THRU SICONDIERSEORE | |
| DATS 20515 EXTERIOR PATROLWAS CONDUCTED OF OUTSIDE PARKING A | |
| PORTICOS IAMBULANCE ENTRANCE HELIPAD. LOADINE DOCK COOLING TOWERS STAFE ENTRANCE DIETARY PATIELMOBE | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| KODOLE TELEVILLE AND | |
| | |
| OSOST MATTER EUNICOCKEDIMOETHALWWARDENTRRANCE HELDOOLST HER MATTER | |
| USION HER HUNILOGKEDIMAIPROMIEOENILEDIAVER EDICERORIENEN | |
| | |
| (1620) IEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEEE | 6(0(0);3) |
| | 计关于 经运行方法保证 计目标 网络拉拉塔加达加达拉哈西部古语的斯特拉德 |
| | |
| GOOLING TOWERS STAFTENTRANSE DIETARY PATIC MOBE | XTERIOR BUILDING |
| EXTERIOR CODE 4AT THIS TIME | |
| | |
| TO THE REPORT OF THE TO HE SECTION AMENDER ON AN INFORMED SECTION AND A | DUIR |
| TOKOT STANDAUSTIST STOLETAMBEROTAND STOTENKED TEDUTA | |
| | |

| End of Shift Activities Total | | A STATE OF A STAT |
|-------------------------------|----------------------------|--|
| | | Missing Banene= |
| | | |
| ASSE | THE REAL PROPERTY AND INC. | Participation |
| | E FOROLEICE A MACHINE | Reloter |
| | | |
| | Heliconer-Hill | Stolen Vehicle Scherer |
| Core NUSA | | Towar Venicie |
| | | |
| Disidio: nee- | | Valuation |
| | | Vancialisin |
| | | |
| | Mele Prized | |
| | | |

Centennial Hills Hospital

"SECURITY DAILY ACTIVITY LOG"

| Shift | Officer | Officer | Officer | Supervisor KING |
|--|--|--|--|---|
| | | | | |
| THE REAL PROPERTY AND | | NDESTIDE SVISIER KINE ENNE | | |
| Sector Sector | 出现是否的。如果自己CF-相关的明 | | | |
| | | | | |
| 57 EH 11. 11. 1 | CHICE ENCOMENTAL PARTY | | | |
| DOL UNTE | 161-92: 18: 18: 29: 41 | Pertensic polety PARTY | | |
| ENG | REMORGUE SOILED | THUR A WAVERALS N | MARENEX | STORAGE |
| | | | | |
| | | | | R HESURCERS AND SEE |
| | | | | A A BROKE DURES |
| | The second se | 1.5.14431 3.0.1753 3.4.122 3.4.11 11 12 2.151 2.151 2.151 | おんだん 見付 (ねったまで) 川丘 ひょうち ごうつうごしん | |
| | | | | |
| Construction of the second sec | | SIDE FROM DANOND | | THESE CNDE |
| | | | | |
| and the second second second second | 31. III. 91. 11. 11. 11. 11. 11. 11. 11. 11. 11 | ほうようと 生き かいたい 台湾 原語 時間 (1) (1) (2) (2) (2) (2) | Gir and the second and a second provide the second | |
| 切削机 化化合物 医白发子 医白色的 | and man or 101 word and and and an end of the and a sub- | | Children of the second states | Contraction and an address of the second s |
| | Contraction of the second s | BEN FILLEN MEDAN | | |
| VES | | | | EDGER-SOCH |
| E VENIE VENERAL PROVINCE | A PERSON NEWSFILMER 2018 | 「「「「「「「「」」」」「「「」」」」」」」」」」」」」」」」」」」」」」」 | おおお 法はよう 卵丸 (火)のたち | |
| | LIGBBY CALLOUT | SEMENTER EIRA | MEDIANCE PAY | NOFTWESTER |
| | | | | |
| | The second se | wanter Hourd 和FEAD 新名 相当的 能力 能力和 | 배요! 영광민종·유학이 이 반환하고 | |
| | | | | DATEX ROLD M BY S |
| | 计分子通道 医鼻骨间 化合合合物 化合合物 化合金 | 副形形 時間につき周期の目的を行うしている(の) りゅう | | |
| DOC | | | | |
| | 711月1日 山田市市 あかがまます 内容 あまたた (日本) | 01.01.62.64.41.66.100.80.67.10.42.67.101.68.67.11.0 | | |
| | | | | RCOMPAND A |
| | | 产生医生素 化化合物 化合体 计计算机 化合体 医全体 医生体 计算法处理 化合金 | | 这时间 和时间的第三人称单数 医马克斯氏 医马克斯氏氏 医马克斯氏 医马克斯氏 医马克斯氏 医马克斯氏 医马克斯氏氏白 医马克斯氏氏白 医马克马克斯氏氏白 医马克马克马克马克克马克马克马克克马克马克马克马克马克马克马克马克马克马克马克 |
| | TACH THE COULTED | | | |
| | | 上的 开始,我们的 他们的问题,但是不是不可以不可能。 | (所由時期時間語意);行用 | NEORMATION |
| | | | | |
| SUR M | RECOMER ADMIT | NG MAINEGEBY ADMITT | NEIEZRAOMITTA | CERAOM INC. |
| | SYN DOSIST SOME ROLL | SASEMANAGEMENINSGIL | DUENCEEN REE | |
| | ACTI SICILI SICI | Activity Performed SociamProvincions A SociamProvincions A SociamProvincions A SociamProvincions A SociamProvincions A SociamProvincions A SociamProvincions A Constructions A Construct | INTERNORPATION ILAMPTON ad Activity Performed SIG LAMPTON, NICHOLS AND SUPERVISOR KING ON SECURITY OFFICER POSITED IN THE FUR 30 SEGURITY OFFICER POSITED IN THE FUR 31 SEGURITY OFFICER POSITED IN THE FUR 32 SEGURITY OFFICER POSITED IN THE FUR 33 SEGURITY OFFICER POSITED IN THE FUR 34 FAMAIN D CAMBERO OFF DUITY 35 SIG MOTIS ENKAND CAMBERO OFF DUITY 36 INTERIOR PATROL OF THE LOADING DOCK HALLWAY 26 REGORIDS LAGAMERO OFF DUITY 36 INTERIOR PATROL OF THE LOADING OFF DUITY 37 REGORIDS LAGAMERO OFF DUITY 38 HEMANDE COCKERS DIAGNOSTIC IMAGING ROOMS 39 FEMANDE COCKERS DIAGNOSTIC IMAGING ROOMS 30 INTERIOR PATROD SECURITY PERFORMED AMINING ROOMS 330 INTERIOR PATROL SECURITY PERFORMED AMINING 344 FUND RUIRSING STATIONS PUBLIC RESTROMS 345 EXTERDER PATROL SECURITY PERFORMED AMINING 346 EXTERDER PATROL SECURITY PERFORMED AMINING 347 FUND RAKING AREA 348 EXTERDER PATROL SECURITY PERFORMED AMINING 349 FUND RAKING AREA <t< td=""><td>Sint Under 13T INGRIGUS LAMPTON: 14 Activity Performed Sol LAMPTON: NICHOLS AND SUPERVISOR KING ON DUTY, BRIEFED B. 25.00 SECURITY MATTERS ALL KEYS AND INADIO TURNED OVER (13) VALUA 26.01 SECURITY OFFICER POSTEDIAL THE EIK 221 26.01 DECURITY OFFICER POSTEDIAL THE EIK 221 26.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL 27.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL 28.01 MOTIS ENKAND CAMBERO OFFI DUTY EC STOPRAGE STOPRAGE 29.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL LILLY MORGUE SCIED UNLITY LAB WATERIALS MATACEMENT IV 20.01 MARGUE SCIED UNLITY LAB WATERIALS MATACEMENT IV CENTRAL STORAGE ENCONCAL STAFF SET VIGES ENCOTROL ACTIVAL DISTRICT 20.01 NESKEEPING, SURGROSH, SICKARE ARADICED YONE SATIVO NUCLE TWO NUCLE 21.1 LAB MEDICAL STAFF SET VIGES ENCOTROL ON NUCLE TWO NUCLE 22.1 DONE AS TWO NUCLE CATH LAB STOTHAGE SCIED UNLING ANGAL ROOM STAFF STAVO NUCLE 23.1 LAB MEDICAL STAFF SET VIGES ENCOTROL ON NUCLE TWO NUCLE 24.1 LADING DOCK STAFF SET VIGES ENCOTROL ON NUCLE <!--</td--></td></t<> | Sint Under 13T INGRIGUS LAMPTON: 14 Activity Performed Sol LAMPTON: NICHOLS AND SUPERVISOR KING ON DUTY, BRIEFED B. 25.00 SECURITY MATTERS ALL KEYS AND INADIO TURNED OVER (13) VALUA 26.01 SECURITY OFFICER POSTEDIAL THE EIK 221 26.01 DECURITY OFFICER POSTEDIAL THE EIK 221 26.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL 27.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL 28.01 MOTIS ENKAND CAMBERO OFFI DUTY EC STOPRAGE STOPRAGE 29.01 INTERIOR PATROL OF THE LOADING DOCK HALLWAY EEC STOPRAGE MANHEL LILLY MORGUE SCIED UNLITY LAB WATERIALS MATACEMENT IV 20.01 MARGUE SCIED UNLITY LAB WATERIALS MATACEMENT IV CENTRAL STORAGE ENCONCAL STAFF SET VIGES ENCOTROL ACTIVAL DISTRICT 20.01 NESKEEPING, SURGROSH, SICKARE ARADICED YONE SATIVO NUCLE TWO NUCLE 21.1 LAB MEDICAL STAFF SET VIGES ENCOTROL ON NUCLE TWO NUCLE 22.1 DONE AS TWO NUCLE CATH LAB STOTHAGE SCIED UNLING ANGAL ROOM STAFF STAVO NUCLE 23.1 LAB MEDICAL STAFF SET VIGES ENCOTROL ON NUCLE TWO NUCLE 24.1 LADING DOCK STAFF SET VIGES ENCOTROL ON NUCLE </td |

5/22/2009 - 2:45 PM

| Page 3 of 3 | | l |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |
| 1011-111-1-11-02-1-11-11-11-11-11-11-11-11-11-11-11-11- | | |
| | ENTRY 2010 PROVIDENT AND A VERCENSION OF A DESCRIPTION OF A A DESCRIPTION OF A DESCRIPTIONO | |
| Annalaking and Connalaking and the | | |
| THE HERE | | |
| | | |
| | | 8 |

Centennial Hills Hospital MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

| Date | Sh | ift | Officer | Officer | Officer | Supervisor |
|----------------------|---|---|---|--|--|---|
| | | animent strength and the | UNNINGIAN | | | |
| Start | End | STREET FOR | y Performed | GUNNINGIAN ON DUPTE | TIESEBBURG AND SEI | TROMALCE |
| | | STOUR IS | TAN AND BESSION | 后 DAV 美国自己公司(D)S 完全了自主的 | | e noze sale |
| | 海湖市川川 川川川川川川川川川川川川川川川川川川川川川川川川川川川川川川川川川川 | 司行計畫自 | AVALUE AND | HIGHES WERE KORDINIE INFRANSSIOENICHESSER | | |
| | | ดโรรเสรา | | | | (f(c)) the second second |
| | | a di sedan ma Berris | a the way have been a could be a water the | RIN PERFORMED AN EXT MAIN LOBERTING SEDERY | 승규는 전 그는 전 전 전 전 전 전 전 전 전 전 전 전 전 전 전 전 전 | 11.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4. |
| | | (二)油(台口口里)(-) | 计形成推进 机闭杆定度电压 经公路 | PARKING MEDICAL OF HIG AST DOCTORS COVERED | 医结节 网络白色 医黄色白斑 常用的 | |
| | | WESTEL | | ARKINGTOSTEHOUITSIOEIS NGIDOGRIMATERIAISIMA | TINE ALEASE | ERATORS |
| | | | | N(HD)@)@K#MATIER/AUSIA MESTER/PARANICTALEAA | | GALE PARKING |
| | | | | | | HAR ET BREESE FREE FREE FREE FREE FREE FREE FREE |
| | | CHERE'S PARTY | | 開設電気の時期時間にあるうと報気性描述など | | PUBLIC |
| | | | OMS PUBLICATI | | | |
| | | 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | DEDISTRICT AND A DEDIS | 能规则的复数形式的复数形式 医胆甾烯酸 | | |
| | 프 12월 R | Setting | | | ARANG MEDICA | |
| | | | ToY STYPE IN PLUSIA STRONG | ことはの「おけいになる」の「おいい」の「おいい」になる。 | 经总理 网络新闻的 网络马利斯 网络马利斯 网络马利斯 | |
| | | | NG SIN AN | NG DOOK MATERIA SIMA AESTER PARKING AREA | | |
| | | | | | | |
| | | | | 清晰的名词 化加速电阻 利兰马拉拉电门的复数形式 | 24.非常是是是自己的问题,但是说 | |
| | | | | MINISTRATIONEMARKETING | | |
| | Ð | and and the first the | 1 (1 And red) (2 (1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 | DRMANCE MERGVEMENT NCERGOM ONE SE WOLES | 医无牙咽 呵 在泡出了马铃子 医鼻子病的复数形式 | 新希望教育的 计分子 网络新教师 计时间间间间间间间间间间间间 间间间间间间间间间间间间 |
| | | STORAC | H-MOMONES ED | 化专家公司时期 国制度时间的 的复数 | | |
| Transminister in the | | C. T. C. L. | | TEX: DEF NUM AND A DEF NUM AND A DEF NUM | | PALE |
| | | E | 4回出,有可言的"作品用"的"品用"等的 | | | PUBLIC |
| | | | A A A A A A A A A A A A A A A A A A A | TING AREAS AND ATENUR ABRYING AGTHALYAR | 25日内田秋日日日月秋日 <u>山</u> 道。 | ASYEUD NOT STAT |
| | | DEACH PROSE | AND DECEMBER OF | nioolekõSEnoiSoutti s | TARVIELE TOOR | ANDTAGTINATING |
| | | 1 2 37. 7 3 | Tothe P. St. d - Ya Starf - 1 - seeds | | GRIAD AVIONED | EL STERE LE |
| | | | | | | Dogize SOL II |
| | | N/ICIT OF | | 马达姓斯凯恩伊维斯的经济重要的自然增强的西方管 | FAKAIN 原注风回县北部内 | |
| | | OWNER | ESTOPACE BUDGE | PARKING CARE OUTSIDE ING DOCK MATERIALS MA | | |
| | | | NGE BAY NOR P | | | |
| E Pace India Addi | 国治111纪1月1 | | | | | |

| Page 2 of 2 | 5/22/2009 - 3:07 PM |
|--------------|--|
| | |
| Equip Equip | TOICKEDERONTI ENTRANCE TWO TO DOORS. DOWN TO THE REAL PROPERTY OF THE RE |
| | INTERIOR PATROL SECURITY/PERFORMELIANINI FRIGR PATRO DETTE MOBBUILDINC: INCLUDINE 181 284.97 (ANOLIVIETOORS) |
| | |
| | INTERIOR PATROLES FOURING PARTON AND AND THE BORDERAL ROLLING AND THE BROAD AND AND AND AND AND AND AND AND AND A |
| | INTERIOR PATROL SECURITY PERFORMED AN INTERIOF PATROL ON THE TROTH COR TIMANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING TUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYCE |
| | ERESOURCES INTRESTATEINCE ADMINISTRATION.CONSERENCE SEEN EMERGY HEALT, SERVICES REPORMANCE IMPROVEMENT INTERCTION CONTROL RISK |
| | MANAGEMENTEGENTEREINGEROOM GNER TWO EDUCATION SOLDERES MAPONS |
| | STORAGE ROOM ONES TWO AND THE HILLS GATE 2 TELOOR WOMEN'S CENTER TABOR |
| | AND DELIVERY, PUBLIC WAITING AREA OWN TRIAGE ABEA, ALL NURSING STATIONS, I.E |
| | EUBLIC RESURGIOMS PATIENT ROOMS POOL 2251 |
| 師長行開幕是有「 | IN OF KEIDED ET ARY CHIREE BUDODRS |
| 122411 12280 | EXTERIOR PATROL SECURITM PERSORMED AN EXTERIOR PATROL ER CIRCLE DRIVE |
| | IWEST EIR PARKING AREA: MAINLOBBY ORCIEDBIVE EIRECONTROL ROOM SOUTHWEST MAINLOBBY BARKING MEDICAL GREIGE BUILDING WEST DOOR SOUTH |
| | |
| | |
| | TOXYGE NET OF AGE I CATOINE DOCK MATERIALS MANAGEMENT DOGK AREA FIR AMBOLANCE BAY INORTHWEST FIR PARKING AREA MONITORED EMPLOYEE PARKING |
| | |
| | INTERLIGE PAUR OF THE REPORT OF THE WAY BED STORAGE CUNICAL |
| | ENGINE ERING CENTRAL PEANT BATTAROOM EXSECTORACE MAINTENANCE BUEAN UTLETA MORGUE SOILED UTILITATIAE MATERIALS MANAGEMENT IVI STORAGE |
| | CENTRAL STORAGE DESONTAM BEARMACY PLABMADY DISTRIBUTION MEDICAL |
| | REFORDS AR MENDERSTATISERVICES DESTRICTION ROOM RECEMATION SERVICES |
| | HOUSEKEEPINIE SURGERY ON CALEROCMSIONES TWO CUTERATIENT SURGERY MALE SEEMALELLOCKERS-DIAGNOSTIC HAAGING INPATIENT HOLD FUID ROSCOPY FILE BOOM |
| | |
| | 此的人名法德斯斯特尔斯特名斯斯特特斯斯特特人名法尔特特斯特特特斯特特特斯特特特特特特特特特特特特特特特特特特特特特特特特特特 |
| | TWO HOT VAB TO TRASOUND ONE STORAGE ROOM W/ROOF ACCESS/AND THE C |
| | ISTO CAMEERCASION CORRORS OF EXCONDINY ELECTRON OF A CONTRACT OF |
| | S/C CUNINICHAM S/C MOTIST S/G ROSSIOF DUTY |

;

12 14

| BIGON FROM THE REAL PROPERTY OF THE | |
|-------------------------------------|--|
| | HESIGORE HERE FROM THE AND A MISSING PROPERTY |
| | |
| Colle IN Cash in the second | Roberty |
| | Eunos Escortante Restrante |
| | |
| Core Rust | |
| Patters eine Bissident's | |
| FEADLER FEED | |
| | |
| CALE | |
| | |

SDAL001410

÷ \$

Centennial Hills Hospital MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

| Date | Shift | Officer | Officer | Officer | Supervisor |
|----------------------|------------------------|--|--|-------------------------------------|-------------------------------------|
| 5,55/08 | | | | | |
| Start En | DER TATA | vity Performed AMBERG/S/O(CORRO) | ANDIS/OTENKICHECKE | DIGNIDUINABRIESEDI | NEELE EN EN NUNC |
| | ACTN | ITT ALL KEYS AND RA | ADIOIS WERE TURNED (| DVER (8 VALUABLES | |
| 128001 1070 | | SECURITY | OF GERGERAS DET ION FOR | NEIRBY ALARM PANE | |
| 較大回去指 較大回去指 時上 | | | OMERING TO LET | E HINAL STREET | |
| | | | NDIQUER VIEW FILLINGER | DVER (8) VALUABLES | TNTHESARE IDI |
| | | PROTOBBADCIES IN | | | |
| | | | | | |
| | | | AND CHITEREN VASHERS OF E | | |
| | | 之名"如此"的"后",后,"你们的",你们的"你们的",你们的你们。 第二章 | NICHTENNERBRUCH Nichter Nichter | 能出活动的 南部市 化甲基甲基甲基甲基乙烯 | |
| | | | | | |
| | 00 INTER | IORIZATROE WAS CO | NBUOFSDIOZEMERSE Viser 822 Extoalist | NOT RECMS THRUE | 3 AND ERROOMSE |
| | 33377911E1=7-31m-9 | 14.4. Heine | 245、単心理が見たち、夏心に悪い 出きしい | · 动机能和最高级的,他们的用于有关的能力。 | |
| | 1010 Estat 2 | | E MANAGEMENTEOHTIC ATIONS HITHRUSICON | | |
| | | EKEDITVO (13) MAIN | DIETARY DOORS FOR | | |
| | | IRBANGE/NURSEASS ATTENT NICHTED FOW | INCINURSESTING FUIG | IONSISEGURIDAAD | INEROOMIBED722 Sederatientricati |
| | | · · · · · · · · · · · · · · · · · · · | INCINURSESTINSTRUCT | 11 10 1A 11 1010 K 11 K 1 K 1 K 1 K | |
| | PLAC | | ANDIPLAGED IN SEC | | |
| 0050 | | A BILLEIDIGK UBLUSAUE SELVAGEDAIN ENVIE OF | | | |
| RODON PROVIDENCE | | TVIEN IN MARIAN (SALO) | N REX. | | |
| 0100 | | ICO'S AMBILIANCEE | NTRANCESHEURADELC | A DIVIELDICIE KE CHEVIERS | |
| | | | ENTRANCE DIFFARME | | |
| -0130 - 02 | | Trate Pol State Total Ville Main | | NCV.ROOMST TURUE | REANDTE/FERDOMS |
| | ROOM | NS # 36 # 37 # 38 # 31 | NAGEL SZ PRICENSU NAGEL SZ PRICENSU NAGEL SZ PRICESSO NAGEL SZ PRICESSO NAGE SZ PRICESSO NA | STAFE ROOM FINANC | ECHICE |
| | | | | | TATON BOOM FOR |
| | | New Mathematical Control of the left | NSULTATION RECEMENT | 戦は相急的に参加力にに出っまであった | |
| | Million and the second | 国家的共同建筑部队的公司 自己 | 「現代の」「開始の言語」、「自己」の語言語 | | |
| | | | | NACE MENDERS IN THE STATE | EBICAL |
| | | IPPOS OF INCALEDIRS | TAN ELEVATORS MA | | |
| | ununen Emilia aut | - Contration of the Contration | HAR THE CONTRACTOR SEA | | |
| | | 2 | · · · | | SDAL0014 |

· |

I.

5/22/2009 - 3:23 PM

| Page 2 of 3 | |
|--|--|
| | ADMINISTRATION OF ECEST 24.7.4000 FWOMEN'S CENTERS MAILENNING SECOND |
| | ADMINISTIKATION OFFICES 21 52 OCA M2MERS SEALE DELIVERY L& DIMAITING AREA ROOMS 201 TO 225 5 FECODR TIME TROOMS 601 TO 532 8 TH FLOODR ROOMS BUI 636 77 FILCOR ROOMS 70 TO 755 ALL RESTROOMS CHECKED ANDIVAITING AREAS CHECKED CODE 2 OFFICER ALSOMONIFORED THE ERENTRANCE |
| | NATING APPAGEURONED 201 01 01 01 01 01 01 01 01 01 01 01 01 0 |
| | |
| THE PARTY OF THE P | |
| Show was not see the second | |
| | |
| | CODING TOWERS STAFF ENISANCE DIE ACTIVITY 1994 FOUND MANY TATAL THE STAFF |
| | EXTERIOR CODEVALETIISTIME TO ALL AND A CONTRACT DOUGH IN THE AND A CONTRACT AND A CONT |
| | |
| | N LERICH AAROU VAS UVARGE IZ 2 EECONSULTATION BOOM MAJOR TREATMEN SOTTERUAT ADM TING TRIAGE IZ 2 EECONSULTATION BOOM EINANGE OFFIGE RCOMS#36 #31 #38 #32 #40 AND #21 MEDIC STATE BOOM EINANGE OFFIGE |
| | ROOMSERS HER HER FISS HE WAND HATE MEDIO STAF FOR MEENANGE OF FICE |
| | |
| | |
| 同次们要管理口關 | ESCORT PALW MORTUARY FROM THE LOADING DOCK THE IN OUR DEET MARKED AND THE TRANSPORTED AND T |
| | DEGEASED PATIENT SAMUELED OF EMERGENCY BOOMS IN THRU 20 AND ERRECOMS. |
| 1433 21530 | |
| | |
| | |
| | WAIN TOBEY ADMITTING STATIONS OF HER USE OF DELEMBER OF THE STATION OF |
| 10500 | |
| 80500 | |
| DEOL HE | UNEOFICETER/OF GLASSINGERSINGERALLWAY (22000R5) |
| | UNEORKED MORESALWAYLENIRANCELLEDODRON |
| | UNEOGKED ADVINSTRATIVE CONFERENCE ROOM FOR THE DAMEN EDOOR FOR THE DAMEN |
| | UNEOCKEPEMOETALWAAYIENIRANOEINI DOORS) IUNEOCKEPEMOETALWAAYIENIRANOEINI DOORS) |
| | ĨŬŇĨŦŎŎŔĸĔĔŔŎŹŦŎĸĊŎĊĬŇĔĿŎſĸĬĬĬĬĬĊĔĊĬŔĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬĬ |
| | |
| | |
| 高市位電望1-35篇 | |
| | |
| 0.35 B0700 | |
| | EXTERIORS FAMILY AND E ENTRANCE HELPADI CADING DOCK CENTRAL PLANISTERIA COLLING TOWERS STAFT ENTRANCE DISTARY PATIO MORENTERAR BENEDING |
| | |
| | EXTERIOR CODES AT THIS TIME TO A CODE OF THE STATE OF T |
| -0645 | 影。 |
| 0610 0635 | |
| | |
| | |
| | |
| Landration contractions | WAIN LOBBY ADMITTING STATIONS AT REALEST CONCLERCE OFFICE STATIONS AT A STATION STATIO |
| | |
| | 度でするを11/2での1度にはですの100円の100円の100円の100円の100円の100円の100円の100 |
| | ISTO FORECISTO CAMBERCIANDES/CLENK DE DUTY HUT |
| SUPERIOR HERE | |

SDAL001412

١.

| STRUCTURE STRUCTURE | i-astastan - A | Missine Patient | |
|--|-----------------------|----------------------|---------------------|
| Assault | | | |
| | | | |
| Code Lift= | I OTENSIC - | | |
| | | | |
| | | LA BUR FOXER VENTERS | |
| E-221-221-221-221-221-221-221-221-221-22 | | | |
| FORSCHIPPINE: A Shull shall | | Variabe Return | |
| Byelein Camie Alami - Ali | Solid Tolug | | |
| Druise | | | |
| 目三人们的自己自己的公主主要的利用制度的 | 用了175日三月19月三日的中国的现在分词 | | 11)- provide 6404 g |

SDAL001413

١

Centennial Hills Hospital MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

| Date | Shift | Officer | Officer | Officer | Supervisor |
|-------------------------|--|--|---|--|---|
| | | ITELED STATES | | | |
| | End Acti | vity Performed | In The Read States of the second s | | |
| 0700 | BEQ. | REDEMATTERS ALL K | EXSANDRADIOHUSNEI | | |
| | | AMEE A MOON FRACE. | | | |
| 17201 Colligation Deals | MALE STORE | OF HERE AND LOSA | BEROLDEFILM | | |
| | | | | | |
| EDED | Marine Hickness | In the second of the | HUMDINE DOIS(1:MILL) | | GUMEAL |
| | | A DATE DI ANALESA | MATERATA PROMESSE UTILITATIAS MANERAL | 是我不可能在自己,因为你能是这个 | |
| | GE | | NTAN PHARMACY PHA TAIT SERVICES ELECT TON DALL ROOMS ONE | | |
| | | THE PROPERTY OF | | | I SURCERY MALE |
| | | | NOETIC IMAGINE INFATI LEKE VIEWING ROOME | の生間期に語りに居らる | |
| | | | VEDAREAL BALIGEORYTO INDENERE IVU SE FRAG | 1.21 ### /6# 15 27 和 314 31 10 10 11 | |
| | | NGDOCK | | | |
| | | | | | |
| | | EXTENSING STAT | ON COM STATE OF THE REST OF THE REST OF THE STATE OF THE | 的理论是自己的自己的问题。 | |
| | 4:52 E E E E E E E E E E E E E E E E E E E | 明治 () () () () () () () () () () () () () | ofoir, crouverse endores the successfield of residences | 法的复数形式 医内静脉管 网络小脑小脑 | |
| | | | CONTRACTED SYMPLEC | | |
| 0900 | FLOO | LOON CHANNELPAST | EN THE WENT NAME AND A ST | | ATATE Y ASSAULTED |
| | | | ATPLETOOR THE AVEX | THE REPORT OF THE REPORT OF THE | ROIEDRIVE |
| | | HEALER AND AND AND AND AND AND AND AND AND AND | MARLEGERADIRGEEDR | Nem Breed Strike | NO CAN BE AND A DECIMAL OF A OF A DECIMAL OF A DECIMALO OF A DECIMAL OF A DECIMAL OF A DECIMAL O |
| | | | PARKING, MEDICAL DER ASTEDPOCEDIRE GOVEREI | The strength of the state of the strength of t | |
| | | | I SITTINGAR BALGENE MENINDOCKAREA ER | | |
| | | INCEANER IN | | | TRANSE STREET |
| 1000 | | CONTRACTOR DE LA CONTRACTA DE LA C | | | CIER CONFAST |
| | | | | 计运动注册 计 分词 计直定 | |
| | Hilling Repair | AGE MANY TRANSFORM | 可用的設備和目的的結果。因此在目 | | |
| | | | HRMIGELELEVATORS IN 1998 FAULTREEMS EINE | 和新聞的「「「」」。 「「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」」。 「」」、 「」」、 「」」、 「」」、 「」」、 「」」、 「」」、 「」、 「 | |
| | | AT E ESTORER ETAG | NGGELG IMAGING INPAT ADMITEING ERIADMIEU | | ORKIROSIMI EKTITTI |
| | | | ADMI INGGERRATIV Vent Someduling Fin Brygadmingingesone | | ROOM AND A |
| | | AGEROOM MANER | BBAA IDMITTING CONC GING ROUTE ATTENDISUS | | |
| | | SHOPESPARWELL | EAND PERMEITERS ET | SVAPORSELLER REAL | |

| Page | 2 | of 3 | |
|--------|---|-----------|--|
| 1 28.6 | - | ~ + + - + | |

7

<u>کې کې</u>

5/22/2009 - 2:45 PM

| Page 2 of 3 | |
|--------------|--|
| | AND A STORAGE ROOM MAIN POBEY! ADMITTING FOONG ERSE! HE DIDESK DRE! ADMIT |
| | TESTING DIAGNOSTIC IMAGING OUTPATIENT SURGEDY OUT PAT ENT MATTING AREA CIRI SEIDE STAIRWEILT Z AND THE VISITORS ELEVATORS IN THE STATE OF BOULD |
| | |
| | EXTERIOR FATROL SECURITY PERSORMED AN EXTERIOR PATROL FROM CUELERIVE. |
| | 新生态的有点,现在的自己的意思,我们这些问题,我们们的问题,我们就是这些情况的问题,你们就是我们能能能能能。""你们就是你们的,你们们就是我们能能能能能能能能能能 |
| | MISTIOR PARKING AREA EAST DECOTORS COVERED PARKING MEDICAL DREICE BUILDING WEST LOBBY CAFE OUTSIDES FING AREA SELVERATORS OXYGEN STORAGE LOADING WEST LOBBY CAFE OUTSIDES FING AREA SELVERATORS OXYGEN STORAGE LOADING |
| | |
| | DOCK MATERIAL SIMANAGEMENT DOOKATEA E RIAMBU ANGE BATENCHTHWEST ER |
| RINNE EDRE | SINTERIOR PATROL OF THE NORTHAND SOUTH FRAREAMORTHER WELOR |
| | |
| | PATIENT ROOM #SISO20, SIDULT EX. ZAHENT ROOM SUBJECT BARASSITTENDERSES STATION |
| | |
| | HEUROPHER SECURITINSET UP FOR MERCY AR ICOPROPERTION PATIENTIC ILLEFT. |
| | AREA MISSING PATIENT DISTURBANCE ESCORT SECURITY WAS CALLED DATASSING PATIENT |
| | |
| | ESCORTED BACK IN LISTROOM |
| | UNTERIOR PATROLESISCURITATER FORMED AN INTERIOR FAIR DUPATER SECOND |
| | TELEORAWOMENESTGENTIEREAFABOR AND DEDIVERY PUBLIC INA IIIN GAREALOUR TELEOR |
| | AREA AT NURSING STATIONS. PUBLIC RESTROOMS PATENTROOMS 201220 THEN |
| | 5635535 AULESE 701 CS HRILBEE PUBLIC RESTROOMS PUBLICAVAITING AREAS AND AUL |
| | |
| 5P50 = = 245 | EVALUATION SPICE PROMINATION |
| | |
| 1800 1844 | IN TERIOR PATROL OF THE MOET CAFELHAT LWAY NORTH DELTARY SNIPANICE THE |
| | TEHT STCAN DINNING FEESTFUCAL ROOM EMPLOYEE MA - 2 FEMALE LOCKERS EAST DET ARY ENTRANCE EMPLOYEE ENTRANCE AND THE MAIL ROOM O'ADING DOCK |
| | |
| | |
| | DOGY, MAIN HALL WAY W SERVICE ELEVATORS, INCOMMATION SERVICES, AND A SERVICES AND A SERVICE AND A SE |
| | |
| | 1.2.9.5.4.1.2.5.1.2.5.1.2.1.1.2.1.2.2.2.2.1.1.1.1 |
| | CONTROL CASE MANAGEMENT SO TEDUCING ENANCE CECTRICAL ROCHANGA. |
| | STIDBAGE ROOM MAIN OF BET AND MILLING SEARCHENCE THE SAMENT WATCH SAME AND A SAMENT AND A SAME |
| | |
| 1145 | |
| | |
| | SOUTHIVEST MAIN LOBBY PARKING MEDICAL OFFICE HUILDING WEST OCOR SOUTH |
| | VISTOR FARKING AREA, EAST DOCTORSBOOVERED PARKING, MEDICAL OFFICE BUHLDING WEST LOBBY CATE OUTSIDE SITTING AREA. GENERATORS, DAVGEN STORAGE, LOADING |
| | DOIDE WATERIALS MANAGEMENTED OCK AREA ER AMBULANCE BAY NORTHMESTER |
| | |
| | IN THE ADDRESS OF THE ADDRESS AND THE ADDRESS AND ADDRESS A |
| | TROMA BISCHARGED PATIENT WHOLES BEHEEVE PATIENT WAS SOPOLITED FOR |
| | SCILAMETON NEHOLS AND KINCTOHEDUTY |
| | |
| | |

End of Shift Activities Total

| B. Lett Block State 1. 1. C. M | | STOLEN AND BEEN AND | and the property of the proper | ····································· | |
|--|--|--|--|--|---|
| · · · · · · · · · · · · · · · · · · · | | Soles - the Contract of the State | | The state of the second st | Part - Alexandra District Independent |
| | | | | and the standard the standard of the stand | |
| | | CICE-PP ING MERICAN | | 11年11日とう11日の印刷品。 | |
| · 用 | | | | | |
| ASBIT | The second state of the se | delite and a second and the second se | | 出したたたたたかがないない | |
| | 수송 문화 방송 비행 비행 비행 수 있는 것을 가 있는 것을 가 있는 것을 가 있는 것을 하는 것을 수 있는 것을 하는 것을 수 있는 것을 것을 수 있는 것을 것을 수 있는 것을 것을 수 있는 것을 것을 수 있는 것을 수 있는 것을 것을 수 있는 것을 것을 수 있는 것을 것을 수 있는 것을 것 않았다. 것 같이 것 않았다. 않았다. 것 않았다. 것 않았다. 않았다. 않았다. 것 않았다. 것 않았다. 않았다. 않았다. 것 않았다. 않았다. 않았다. 않았다. 않았다. 않았다. 않았다. 않았다. | A 1 4 1 4 1 4 1 1 4 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 2 | | 日本には、「「「「」」」の「「」」「」」 | \$ 1 1 0 11 Slaverbillshimst |
| 遊品という!!! L型の-幕門的用語を表示 | | and a state of the ball of the state of the | in the second seco | Hallander States - | |
| | | THE PROPERTY AND | IN PROPERTY AND INCOMENTAL OF PROPERTY | | CALL CONTRACTOR OF A DOCTOR OF A DOCTOR |
| | | | | | |
| 且可以?!? 医蛋白 : 三、制器制的路 | | | | Ballyhalteristelining freeteric | the feltitit differente de standarde |
| EctedInational Content of Content | | Training and the second se | | | |
| | | an francing of the first of the state of the | RPF: 12:12:12:12:12:12:12:12:12:12:12:12:12:1 | 1993年1月1日日 18月1日日 | |
| | | のに対していたりに見る部門 | | Hard Strategy and the state of | |
| | | | Anstountaneuru | | |

SDAL001415

| Page 2 of 2 | | 5/22/2009 - 2:45 PM |
|------------------|--|------------------------|
| 105012 41 513 | INTERIOR PARONISEO URITY BERECRAEPAN INTERIOREATRO U ONTUBIO FLOOR WOMENSICENTERI PAGO FANS DE IMERY FUBIO WATHING AREA | |
| | | IPROICITAS |
| | SOT 5302 SUPERVIEW BULGER BULGER STRUCTURE FUEL FOR AN AMAINING AR | FASANDALL |
| F 50 1200 | UN DOKED DOOR SECURIT COPENED THE ADMINING SUPERVISIONS OF H | FORAN |
| 1200 228 | EXTERIOR PATROE SECURES PERFORMED AN EXTERIOR RATROF ER CIR WEST EIR PARKING AREA MAIN TOBEMORGE DRIVE FIRE CONTROL ROOM SOTTEWEST MAIN TOBEV PARKING MEDICAL OFFICE BUILDING WEST DPOT | Sigle Physics |
| | MISTICH PARKING AREA EAST DOLTORS GOVERED PARKING MEDITAL OF MESTRUOBRY CATE DUISIDE STEINGARE ALGENE FAVORS ON GENETOR REFERENCES MATERIALS RANAGEMENT DOCKAREA ER AMBULANGE BAV NORTH | CERTIFICATION CONTRACT |
| 5742-5300 | I DATALING VAREA I VENE BASERIGI XUTEDITION PATIENTAL I VENE BASERIGI XUTEDITION PATIENTAL I VAN UADE SAME INFORMATION IN THE | |
| 1300 | INTERIOR PATROL OF THE CANOING DOCK HALLWAY BODSTORAS CONT NCINEERING CONTRACT WANT DATA BOOM OVERSTORAGE MAINTENANC UNITED WIGHT SOLED CONTRACT AS MANAGEMENT AS STO | |
| | CENTRAL STORAGE DECONTAM PHARMACY PHARMACY DISTREUTIONS RECORDS LAB MEDICAL STAFE SERVICES TELECTRICAL PCIDMINEORMATIC HOUSEKEEPING SURGERY CNICAL ROOMS ONE STWO. OUT PATIENT SU REFEMALE LOCKERS DIAGNOSTIC MAGINO TREATENT HOLD FLUOROSCOP | |
| | TO ALT LAB STORAGE ECHO. EXERVIEWING ROOM CAT LAB MR. SHE GAU TONE & TWO SOUTH MACING AREA FALLOLOGY ON EXTWO NUCLEARME TWO HOT LABULI RASSOUND ONE & TWO STORAGE ROOM WIROCH ACCE | |
| | | |
| M00 -145 | INTERIORIPATROLESSOURIE 122REDRMED/ININTERIOR FATROLSINICESS ELICERTYCKIENS CONTERCIVED FATROLESY PUBLICS VALUNCIARCAS | |
| | AREA ALLINURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS#20 | |
| | Scinces_conloads. 701-738 Boil 836 PUBLIC RESTROCMS REBERS WAITING AS NURSES STRATIONS | |
| FF 7 61.500 | I SIGINIA HOLEST KINCYANE WANDED YELE HOUR WILL HE WAS AND A REPORT OF A | |

1

| End of Shift Activities Total | |
|------------------------------------|---------------------------------|
| | Missing Paliphana and Angel |
| | MISSING Freedow Fundament |
| | Parality Milenion Entry Comment |
| Cole If Classic Providence | |
| SOLDERING - THE FILM | Requirements |
| GoleRad | Stolen venicle in Heller Philip |
| Goldenen | |
| | Vallable Bleku - 24 Hill - E |
| | Valuabe second states - see |
| E Plate M Gamba M G An E State | Vengelenn - men and and and and |
| Grills - Let an Aller Aller | |
| FROE UTO: UE: E E E | |

Γa

Centennial Hills Hospital MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

| Date | | hift | Officer | Officer | Officer | Supervisor |
|------------------------------|---------------------|--|--|--|-------------------------------|--|
| | | | | The Roless of the International | | |
| Start | End | E-975 TEPPET | y Performed | | DIDA'N BRIEFING | PERMIT |
| | | BROURF | A A THE READ THE | e dan All Radios and Rivelopes were rouge | | RTO2-STIPL |
| Henrichten filtertertertert | 45×04 | SIGNATION | INTOIS TO BE AND THE | ONFARINES (CINCER O) AS TO A | | |
| Communitation (Second Second | | OFFICER | | | | |
| 4530 | | | | | | |
| | | | | NI MERINA MEDIANA | | TE MOBEUILDING |
| | <u>т</u> е Красн | | | | | RETROUTED RIVERING |
| | | | R PARKINCIAREA Est main lobem | MAINEOBBYSCIRCIT DRIV CARRING MEDICAL OF TO ASEEDOOHORS COVERED | | |
| | | LET TRANKING | is extern strom where | 말하는 것 같은 것 같 | ●日本(1)、~おを161日を)はこれの4 | |
| | | | OTODACE INAN | NG DOOK MATERIALS MA NESTER PARKING AREA | | |
| | | the second second | | URITY WAS CALLED TO RE | | |
| | | | | | | |
| | 1800 | SHEURI | | NGHEDRICHEDERCHHEM NGHEDRICHEDEROREICH NEISNHEEDROXENHER RHENREDHESMEERCASS RHENREDHESMEERCASS RHENREDHESMEERCASS RHENREDHESMEERCASS | | |
| | | | | | | EIKCOVERING |
| | | | | | VHEN HAD ASEP | |
| BECCH. | 4640 | MITHERPITEI | -E-J.S.F. ALLINA | | | |
| | | | 9 月6月日2月1日日日日日 | TROCIME FOR 582 601 68 INGVARENSANDALLINUS | | |
| | | | | | | |
| | | The second s | | 4. (1) (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2 | 医 | |
| | | | | TEING ADMINISTRATION C DRMANCEIMPROVEMENT NEERCOM CNESSIWOL | | |
| | | 末い中国のしており | 1988年1月1日日日1月1日日1月1日日日1月1日日日1月1日日日1月1日日日1日日日 | 法保持的第三人称单数 化合物 法有效通知 计计算机 经济运行 化分析 机分析法 | | TAT PARTY AND AND AND ADDRESS OF THE PARTY AD |
| 1830 | | | REARIGING ASSA | RITYLEERFORMEDIAN EX MAIN LOBBYCCIRCLE DRI PARKINGEMEDICALIOFTIC | | ROOM |
| | | INVICE OR | PARKING AREAH | 2월21年일9(6월9) 상관(6년) (2월2년) | 単なないには、これは自己になる | |
| | | WEST | | | | |
| | | | NCEERY NORIE | MEST SITEARKING AREA | | OMEE BARKING |
| 100 | 1900 | HINE Hallo | , a 2141; (oltrol 1) | | | |
| | | HERO RAC | 网络哈哈哈哈哈 帕帕 | | Compared by the second second | |

| Page 2 of 3 | 5/22/2009 - 3:07 PM |
|----------------------|--|
| 1913 1940 | BESTROOMS 2018 IC WADNERAREAS AND AUCINURSES STATIONS WITH CONSTRUCTION OF A DESCRIPTION OF A |
| | INTERICE PATROL OF THE MOB BUILDING INCLUDING 11 219 37 AND A REPORTS |
| 1926 FP30 | EDATAMEDIR OUT OF THE AND A CONTRACT OF THE |
| | ROOM BOR SEEINGIDENT LOCITIEN DAYSTICT HER BROOZES THUR DIE NOT |
| | THEFREISM AN INDIVISION WHEN DEPENDENT OF HIMSENE AS A DEPENDENT OF A DEPENDENT O |
| | RERMISSION EROMETRIEZ, MENTINEROPHEROELEROEANINTERVIEW POLOEERATOR 12 EAGET |
| 2015 2020 | SHIRLEY PROVIDED INSTRUCTIONS TO PEATO ROUTE AS INQUIRLES TO FRANK 9709 |
| 2012/1 - 22/1 E | EDITERICR PATROL SEGURITY PERFORMED AN EXTERIOR PATROLE PROURCE DRMER WESTERPARKING AREASMAIN CORPANIED OR DRIVE FIRE CONTROL RECOMPANY |
| | SOUTHWEST MAIN EGBEY PARKING MEDICALIOFTICE BUILDINGWEST DOOR SOUTH |
| | WEST LOBBY SEMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS |
| | AMBULANCE BAX NORTHWEST EATEARMING AREA MONITORED EMPCOTEE PARKING |
| FOR LEAD | ERGINGING SEBAULES REMINISTRATION MARKETING STAFF TRAINING HUMAN |
| | TRESOURCESENURSESTATING ADMINISTRATION CONFERENCE CENTER EMPLOYEE THE |
| | MANAGEMENT CONTERENCE ROOM ON EXTING EDUCATION SOUTH RESTRUCTIONS |
| | ZUB TO RESTROOMS FATIENT ROOMS # 201-225-11 |
| 192007 19220 1 | TEXTERIOR PATROE SEGURDY PERFORMED AND MERICIR PATROLIER OIRG E DRIVER MESTER PARKING AREL MAINLOBEVEUROLE DRIVE HER CONTROL ROOM |
| | |
| | VISTIOR FARMINGAREA EAST DOCIORS COVERED FARMING MEDICAL OFFICE BUILDING MEST JOBBY EMPLOYEE PARKING CATE OF ISIDE SETING AREA GENERATORS |
| | AMBULANGE BAY NORTHWEST EREPARKING AREA WONTORED EMRIC) EE PARKING |
| | SECURITY NOTE: SISTAING AND STORICHOLS ARRIVED TO ASSIST WITH CONTROL OF |
| | |
| | |
| | TREPOROSILATEMENTAL STATTSERMICES EIECTIFICEER DUMINFORMATIUNDER VOUS FU HOUSEREENIGESURGERATEN MAUEROOMS ONE SEWE OUT PATIENT SURGERY MASE |
| | GTEMALE LOCKERS DIAGNOSTIC MAGING INPATIENT HOLD FULDOROSCOPY ALL EROOM CATHLAB STORAGE ECHO, EKG VIEWING ROOM, DATHLAB MRI SBECKL PROCEDURES |
| | CNES TWO SOUTH MAGING AREA RADIOLOGYONES WOUNDSLEAR MEDICINE ONES |
| EXTERNAL PROPERTY IN | ELECTRONIC DE LA COMPANY DE LA COMPANY DE LA COMPANY DE |
| | ES/OTO/AMBIERO/IS/ONIMOTAS/S/OTS/ROAFERS/FS/OTEN/MONIBUTS/ETHILITAL AND |
| | |

2.97 A

| End of Shint Activities Total | |
|--|------------|
| BEI OM FROM MY FULLY LEW MILLER Resonant Huge In the Fat Missing Patients - | 騙得 |
| | 創港 |
| · 图示者101-101/25月2年3月3月16日、101-11月17日、111-11月1 | (TH) |
| Assentite with a reserve and reserve and the second s | 44 |
| | 111 |

| Page 3 of 3 | 5/2: | 2/2009 - 3:07 PM |
|--|--|------------------|
| | HERE THE REPORT OF | |
| | Eoremsic = | |
| | TUNES ESCOT = *********************************** | |
| | Heirester | |
| Congress | | |
| | | |
| LISADORADE PROVINCIAL | | |
| The strategies and the state of | | |
| | | |
| Braphande - Ba | | |

Centennial Hills Hospital

"SECURITY DAILY ACTIVITY LOG"

| Date | Shift | Officer | Officer | Officer | Supervisor |
|--|---------------------------------------|--|---|----------------------------|----------------------------|
| 3/18/08 | - Calendaria (Calendaria) Interna | SK | | | |
| Start E 2300 | | y Performed | •JSTHEROUGH HER #ANDESTORY | | ETHER PRINT |
| | THEEVE | NING ACTIVITY AG | KEYS AND RADIO'S WE | | |
| | | | TIOR BADGES INSTREES | | |
| | | | | I TARGET I PAGE AND A DATA | |
| distantio zonal toucius | | REATENDENWARTER | NDUGEEDOREMERGEN | ICY II: O DWICE BERING | est and elements |
| | | | IAGE 1 & 2 E/R CONSUL # 40 AND #41 MEDIC S | | |
| | HE SCHEDU | ING OFFICE CASE | MANAGEMENT OF EGE | e esse en incole el | |
| | H MAIN LO | BEY ADMIETING ST | ATIONS DE RUIS GONC SUL A TON ROOM (15 | | |
| | E CARELA | TS PREZ PARTP | RIGHT FOR STATE AND A DECIMAL A | IR AS ESTURICE RAMEINE | 20日日3月日1(0)日日12(5)田 |
| | I ROOM | ATHUABLEATHUA | DCONTROL ROOM SER | Mere Haveners II | |
| | | | RIUE WATERAES MANA Nomeo ale die tary ri | | |
| | RECON | SECLINICALIFIES | MAIN ELEVATORS MAIN | | TARS ENDING |
| | | | INCLOEF(CEMARKEN) WIELOORIVIOMENS C | | |
| | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | SERVICE AND SERVICE | | | augelijsselsselester forze |
| | | REROOMSIAN GAS | ZE FLOOREZ OFFICER | | |
| | Fill APPEARS | ISTEDIADMITEINE | AS NEEDED | | |
| 1819.03.64.65.011 20.22.2 | | NINGI JAWKANDE (O | HAHNYOFEDURA HANN | | |
| 0000 | | | | | |
| | SOTHRU | 47 ADMITTING TR | ACE 22 F/R CONSUL | TATION ROOM MAL | |
| | ROOMS | | MANAGEMENTEOFFICES | | |
| | MANLO | EBAPADMILITINGST | ATIONS OT THRU 5 CONC | | Mateleveroleville |
| | DACNG | | SULEXTION REDME | | |
| | THE REPORT | | SIGOL TROUGH ROOM SIN | MCEELEVATORS | |
| | ENDOSC | OFY, CENTRAUST | RILE MATERIALS MANA | GEMENTRAL | PLANT EVS |
| | | | DOM CAFE DIETARY, P MAIN ELEVATORS, MAIN | | |
| | | TH) NURSESTAF | ING OFFICE MARKETIN | ig office, is offi | ÇE, |
| | | HRANNOR DOSS MALES DAWART NO. | 212 EL OOR WOMENS C REA ROCHMS 20, TO 22 | | |
| | | RROOMSBRESS | CHE HID OLD ROOM STOLEN | 10 720 SUX HURSEI DO | |
| | | nnglare Astelles Ssiedfad Mile Inge | | | HE ENSEM PANCE |
| | BOB DESERVE | R PATROLINASICA | NEUGREIFEELELUIGIDE | | |
| | FRORTO | IS AMEULANOE EN | TRANCE HELEADIER INTRANCE DIERARY PA | EING NOOK DENT | ALEANT |
| | | Recenter at this | | | |
| o od i i i i i i i i i i i i i i i i i i | | DENIZE MENASERION | 加設定在基礎的構成 | | |
| | EN ROEK | (SSETTASSISTED) | THE SECTION OF STREET, S | A BALLEDI SIN BAL | |

| 5/22/2009 | - 3.23 PM |
|-----------|--------------|
| 312412003 | - 2.42 6 114 |

1

| | · | 5/22/2009 - 3:23 PM |
|---|--|-----------------------------|
| Page 2 of 2 | 220= IN LERIGREATRO WAS SONDUCITED OF EMERGENCY ROOMS | FILLER FRENCH STREET, BASED |
| | | |
| | 220 TM LERICIN ZAURO WAS SOMED ITTE UN CONSULTOIDNING 30 TFRU 4: MOMENING TRIKOL 122 E.R. CONSULTOIDNING | |
| | | |
| | SCHEDU ING OFFICE CASE MANAGEMENT OFFICE LOSSICON | |
| | 時代が当時になりは進めたらった時の以外で用きなどがくやきに思いたが、認識には能力に思いた。日本の日本の日本の日本 | |
| 10200 | | |
| Intractional and a statistical designed | | |
| | THE PORTION STAMPULANCE ENTRANCE HEURAD COMPANY DOCH | CEN RAFELANE |
| | COOLING TOWERS STAFFENTRANCE DIETARY PATIO MOBE | TERIOR CUIENNEE |
| | | |
| | | |
| 0300 | NEW TOOMOOR OF STREET TO THE PROPERTY DO THE FEATURE STREET FOR THE STREET FOR TH | |
| E REFE ID | NITERIOR PARROLEWAS CONDUCTED OF EMERCENCY ROOMS | |
| | | |
| | ROOMSI#335#STC#32#39#30WND#21 MEDICSTAFEBOO | |
| | THE STATE OF THE CELEVANE OF VENDOR OF THE TRADE OF THE STATE OF THE S | |
| | WAR DEBY ADVICTING STATIONS IN TRUES CONCLERED OF | |
| | | |
| | VIEW EXTERIOR PATROLIWAS CONDUCTED OF OUTSIDE PARKING | EEASIAHUENTRANCES |
| 10352-10 | PORTIGO'S AMBULANCE ENTRANCE HELPAD 10 ACINC 200 | |
| | COOLING TOWERS STAFF ENTRANCE DIFTARY PATIO MOBE | |
| | SOGINGIOMERS SIAFTENTRINGEDICTION FOR SOL | |
| | EXTERIOR CODE 4 AT THIS TIME | |
| | | |
| 酒(注) 三百 | JABON INHERIOR PATROLIWASICONDUCTED DE EMERGENCY ROOMS | |
| | 30 FIRU AN ADMITTING TRIAGE 18 2 FR CONSULTATION BO | |
| | | |
| | | |
| | | |
| 10450 | UNECCKEDISH DOORS FOR THEO MECARELERIA (BIDCORS) | |
| Factor Dis-Goldson | PBXCREOFIVED INVOKEYSTEORATHEDAYATA TO A STUDIED IN | |
| 80,000 | UNIGORED MAINTENNERTRANGET FOR THE DAYN, 22000RB HELLY | |
| 夏 60月二 | WIN CORED IN AN EXTERIOR CRASSING REINIMOBILATIV | |
| 0500 | | |
| 0505 | THE FUNCTORY FOR THE AND THE A | |
| 10516 III | UNLOCKED PACESED RELIEDAYE (LEDOS) | |
| TIS212 IN | TING OF CIDER DONE TO REFE PANELED OF DESIGN | |
| | | |
| | | |
| | | |
| | | ELECTRON DUDNESS CONTRACTOR |
| 107200 | IS/CINIC/OUS IS/OLIAMETON IS/OLCUNNINGFAM AND SUSGAM | |
| | OT OF ISO CAMBERCESIGIENKASIC MONISAND SIGISI FROMHER OF | |
| Constant of the local division of the local | | |

End of Shift Activities Total

 \mathbf{x}

· · ·

| Ella di Olilia italia italia | | |
|--------------------------------|-----------------------------------|--|
| 86 off Property 2 | E/R Restraint = | |
| Assault | Escont | |
| | | Parking Violation = |
| COLE IN | | |
| Goode Pink- | | Restrant |
| | Allecine 2 and a second | ISIGER MEDICE |
| Front C. Front II. | Fost GILEGRAUMORE SEL | |
| PENNELSE (PENNELSE) | Interio/ExteriorPatrol = 8 | |
| Disturbance = | Jump Stan Vehicle + | Nalia le Rouri - a la l |
| Deor/Canc Alam - | Fost & Found = | -Vancalism |
| | Wein Rotskillinkelek - Wie autour | |
| E3/FA BJS (CI DAMERE) EST HALL | | |
| | | |

IN THE SUPREME COURT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; AND UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation,

Appellants,

VS.

ESTATE OF JANE DOE, BY AND THROUGH ITS SPECIAL ADMINISTRATOR, MISTY PETERSON,

Respondent.

APPEAL FROM THE EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA HONORABLE JUDGE RICHARD SCOTTI, CASE NO. A-09-595780-C

APPELLANTS' APPENDIX TO OPENING BRIEF

VOLUME XII of XVII

Docket 70083 Document 2016-25347

DENNIS L. KENNEDY, NEV. BAR NO. 1462 JOSEPH A. LIEBMAN, NEV. BAR NO. 10125 JOSHUA P. GILMORE, NEV. BAR. NO. 11576 **BAILEY & KENNEDY** 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148 TELEPHONE: (702) 562-8820 FACSIMILE: (702) 562-8821 DKENNEDY @ BAILEYKENNEDY.COM JLIEBMAN @ BAILEYKENNEDY.COM

MICHAEL E. PRANGLE, NEV. BAR NO. 8619 KENNETH M. WEBSTER, NEV. BAR NO. 7205 JOHN F. BEMIS, NEV. BAR NO. 9509 HALL PRANGLE & SCHOONVELD, LLC 1160 N. TOWN CENTER DRIVE, STE. 200 LAS VEGAS, NEVADA 89144 TELEPHONE: 702.889.6400 FACSIMILE: 702.384.6025 MPRANGLE@HPSLAW.COM KWEBSTER@HPSLAW.COM

Attorneys for Appellants

APPENDIX TO APPELLANTS' OPENING BRIEF

VOLUME XII of XVII

TABLE OF CONTENTS

| <u>Tab</u> <u>No.</u> | Document Title: | Page Nos.: |
|--------------------------|--|---------------|
| 45 | Plaintiff's Exhibit 1g – Defendant Valley Health | AA2297- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2304 |
| | Center's Seventh Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | October 27, 2014 | |
| 46 | Plaintiff's Exhibit 1h – Defendant Valley Health | AA2305- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2315 |
| | Center's Eighth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | April 22, 2015 | |
| 47 | Plaintiff's Exhibit 1i – Defendant Valley Health | AA2316- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2326 |
| | Center's Ninth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | June 10, 2015 | |
| 48 | Plaintiff's Exhibit 1j – Defendant Valley Health | AA2327- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2340 |
| | Center's Tenth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | June 16, 2015 | |
| 49 | Plaintiff's Exhibit 1k – Defendant Valley Health | AA2341- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2354 |
| | Center's Eleventh Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | June 17, 2015 | |
| 50 | Plaintiff's Exhibit 11 – Defendant Valley Health | AA2355- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2369 |
| | Center's Twelfth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | July 10, 2015 | |

| 51 | Plaintiff's Exhibit 1m – Defendant Valley Health | AA2370- |
|----|---|---------|
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2384 |
| | Center's Thirteenth Supplement to Its Initial Early | |
| | Case Conference List of Witnesses and Documents | |
| | dated July 13, 2015 | |
| 52 | Plaintiff's Exhibit 1n Defendant Valley Health | AA2385- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2399 |
| | Center's Fourteenth Supplement to Its Initial Early | |
| | Case Conference List of Witnesses and Documents | |
| | dated July 20, 2015 | |
| 53 | Plaintiff's Exhibit 2 – Centennial Security Daily | AA2400- |
| | Activity Logs May 14-16, 2008 | AA2421 |
| 54 | Plaintiff's Exhibit 3 – Deposition Transcript of Renato | AA2422- |
| | Sumera, RN taken on May 1, 2015 | AA2461 |
| 55 | Plaintiff's Exhibit 4 – Universal Health Services | AA2462- |
| | Incident Report dated May 15, 2008 | AA2464 |
| 56 | Plaintiff's Exhibit 5 – Complaint for Money Damages, | AA2465- |
| | Cagnina v. Centennial Hills Hospital Medical Center, | AA2489 |
| | et al., Case No. A570756, filed September 2, 2008 and | |
| | First Amended Complaint for Money Damages, | |
| | Cagnina v. Centennial Hills Hospital Medical Center, | |
| | et al., Case No. A570756, filed April 28, 2010 | |

APPENDIX TO APPELLANTS' OPENING BRIEF

ALPHABETICAL INDEX

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Amended Complaint filed August 21, 2009 | Ι | 2 | AA0007- |
| | | | AA0012 |
| Complaint filed July 23, 2009 | Ι | 1 | AA0001- |
| | | | AA0006 |
| Defendant American Nursing Services, | Х | 27 | AA1822- |
| Inc.'s Joinder to Plaintiff's Opposition to | | | AA1824 |
| Defendants Valley Health System LLC | | | |
| d/b/a Centennial Hills Hospital Medical | | | |
| Center and Universal Health Services, Inc.'s | | | |
| Motion for Reconsideration of this Court's | | | |
| November 4, 2015 Order filed December 4, | | | |
| 2015 | | | |
| Defendant Steven Dale Farmer's Limited | Ι | 5 | AA0094- |
| Opposition to Plaintiff's Motion for | | | AA0098 |
| Summary Judgment Re: Liability filed | | | |
| October 13, 2014 | | | |
| Defendant Universal Health Services, Inc.'s | Ι | 3 | AA0013- |
| Answer to Plaintiff's Amended Complaint | | | AA0021 |
| filed September 11, 2013 | | | |
| Defendants Centennial Hills Hospital and | Ι | 7 | AA0113- |
| Universal Health Services, Inc.'s Errata to | | | AA0116 |
| their Opposition to Plaintiff's Motion for | | | |
| Summary Judgment Re: Liability and | | | |
| Joinder to Defendant Steven Dale Farmer's | | | |
| Limited Opposition October 16, 2014 | | | |
| Defendants Valley Health System LLC | IV | 20 | AA0612- |
| d/b/a Centennial Hills Hospital Medical | | | AA0735 |
| Center and Universal Health Services, Inc.'s | | | |
| Brief in Support of Their Position Re: | | | |
| Evidentiary Hearing filed August 26, 2015 | | | |

| Document Title: | Volume No.: | Tab No. | Page Nos.: |
|--|----------------|-------------------|------------|
| Defendants Valley Health System LLC d/b/a | XVII | <u>No.:</u> 84 | AA3306- |
| Centennial Hills Hospital Medical Center and | ΛΫΠ | 04 | AA3308 |
| Universal Health Services, Inc.'s Joint Notice | | | 1113300 |
| of Appeal filed March 30, 2016 | | | |
| Defendants Valley Health System LLC | VIII | 25 | AA1390- |
| d/b/a Centennial Hills Hospital Medical | | | AA1589 |
| Center and Universal Health Services, Inc.'s | | | |
| Motion for Reconsideration of this Court's | | | |
| November 4, 2015 Order filed November | | | |
| 19, 2015 | | | |
| Defendants Valley Health System LLC | III | 13 | AA0469- |
| d/b/a Centennial Hills Hospital Medical | | | AA0487 |
| Center and Universal Health Services, Inc.'s | | | |
| Opposition to Plaintiff's Motion for NRCP | | | |
| 37 Sanctions filed May 13, 2015 | | | |
| Defendant's Exhibit A – Las Vegas | X & XI | 35 | AA1867- |
| Metropolitan Police Dept. File | | | AA2050 |
| Defendant's Exhibit A-1 (Pictures of | XI | 36 | AA2244- |
| Defendant Farmer) | | | AA2249 |
| Defendant's Exhibit List from Vault | Х | 33 | AA1863 |
| Discovery Commissioner's Report and | IV | 19 | AA0605- |
| Recommendations filed August 19, 2015 | | | AA0611 |
| Evidentiary Hearing Brief in Support of the | V | 21 | AA0736- |
| Striking of Defendant Centennial Hills | | | AA0948 |
| Hospital's Answer to Plaintiff's Amended | | | |
| Complaint and Affirmative Defenses filed | | | |
| August 26, 2015 | | | |
| Notice of Entry of Order Denying Motion | Х | 30 | AA1842- |
| for Reconsideration filed December 11, | | | AA1847 |
| 2015 | | | |
| Notice of Entry of Order on Plaintiff's | III | 10 | AA0352- |
| Motion for Summary Judgment Re: | | | AA0362 |
| Liability filed March 2, 2015 | | | |
| Notice of Entry of Order Striking Answer of | VII | 24 | AA1348- |
| Defendant Valley Health System LLC as | | | AA1389 |
| Sanction for Discovery Misconduct filed | | | |
| November 5, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|-------------|-------------|------------|
| | <u>No.:</u> | <u>No.:</u> | |
| Notice of Entry of Stipulation and Order for | Х | 32 | AA1854- |
| Dismissal with Prejudice filed February 29, | | | AA1862 |
| 2016 | | | |
| Order Denying Motion for Reconsideration | Х | 29 | AA1839- |
| filed December 10, 2015 | | | AA1841 |
| Order Denying Petition for Writ of | III | 14 | AA0488- |
| Mandamus or Prohibition filed May 20, | | | AA0489 |
| 2015 | | | |
| Order on Plaintiff's Motion for Summary | III | 9 | AA0344- |
| Judgment Re: Liability filed February 27, | | | AA0351 |
| 2015 | | | |
| Order Setting Evidentiary Hearing filed | IV | 18 | AA0602- |
| August 4, 2015 | | | AA0604 |
| Order Striking Answer of Defendant Valley | VII | 23 | AA1309- |
| Health System LLC as Sanction for | | | AA1347 |
| Discovery Misconduct filed November 4, | | | |
| 2015 | | | |
| Plaintiff's Exhibit 1 – Defendant Centennial | XI | 37 | AA2250- |
| Hills Hospital and Universal Health | | | AA2254 |
| Services, Inc.'s Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated November 24, 2009 | | | |
| Plaintiff's Exhibit 1 – Photo of Universal | XI | 38 | AA2255- |
| Health Services Address with Vault Exhibit | | | AA2256 |
| Form | | | |
| Plaintiff's Exhibit 1a – Defendant | XI | 39 | AA2257- |
| Centennial Hills Hospital and Universal | | | AA2262 |
| Health Services, Inc.'s First Supplement to | | | |
| Its Initial Early Case Conference List of | | | |
| Witnesses and Documents dated April 16, | | | |
| 2010 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 1b – Defendant Valley | XI | 40 | AA2263- |
| Health System, LLC d/b/a Centennial Hills | | | AA2269 |
| Hospital Medical Center's Second | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated February 12, 2013 | | | |
| Plaintiff's Exhibit 1c – Defendant Valley | XI | 41 | AA2270- |
| Health System, LLC d/b/a Centennial Hills | | | AA2275 |
| Hospital Medical Center's Third | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated March 11, 2013 | | | |
| Plaintiff's Exhibit 1d – Defendant Valley | XI | 42 | AA2276- |
| Health System, LLC d/b/a Centennial Hills | | | AA2281 |
| Hospital Medical Center's Fourth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated March 12, 2013 | | | |
| Plaintiff's Exhibit 1e – Defendant Valley | XI | 43 | AA2282- |
| Health System, LLC d/b/a Centennial Hills | | | AA2288 |
| Hospital Medical Center's Fifth Supplement | | | |
| to Its Initial Early Case Conference List of | | | |
| Witnesses and Documents dated March 18, | | | |
| 2013 | | | |
| Plaintiff's Exhibit 1f – Defendant Valley | XI | 44 | AA2289- |
| Health System, LLC d/b/a Centennial Hills | | | AA2296 |
| Hospital Medical Center's Sixth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 7, 2013 | | | |
| Plaintiff's Exhibit 1g – Defendant Valley | XII | 45 | AA2297- |
| Health System, LLC d/b/a Centennial Hills | | | AA2304 |
| Hospital Medical Center's Seventh | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated October 27, 2014 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 1h – Defendant Valley | XII | 46 | AA2305- |
| Health System, LLC d/b/a Centennial Hills | | | AA2315 |
| Hospital Medical Center's Eighth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated April 22, 2015 | | | |
| Plaintiff's Exhibit 1i – Defendant Valley | XII | 47 | AA2316- |
| Health System, LLC d/b/a Centennial Hills | | | AA2326 |
| Hospital Medical Center's Ninth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 10, 2015 | | | |
| Plaintiff's Exhibit 1j – Defendant Valley | XII | 48 | AA2327- |
| Health System, LLC d/b/a Centennial Hills | | | AA2340 |
| Hospital Medical Center's Tenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 16, 2015 | | | |
| Plaintiff's Exhibit 1k – Defendant Valley | XII | 49 | AA2341- |
| Health System, LLC d/b/a Centennial Hills | | | AA2354 |
| Hospital Medical Center's Eleventh | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 17, 2015 | | | |
| Plaintiff's Exhibit 11 – Defendant Valley | XII | 50 | AA2355- |
| Health System, LLC d/b/a Centennial Hills | | | AA2369 |
| Hospital Medical Center's Twelfth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 10, 2015 | | | |
| Plaintiff's Exhibit 1m – Defendant Valley | XII | 51 | AA2370- |
| Health System, LLC d/b/a Centennial Hills | | | AA2384 |
| Hospital Medical Center's Thirteenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 13, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|-------------|------------|
| | No.: | <u>No.:</u> | |
| Plaintiff's Exhibit 1n – Defendant Valley | XII | 52 | AA2385- |
| Health System, LLC d/b/a Centennial Hills | | | AA2399 |
| Hospital Medical Center's Fourteenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 20, 2015 | | | |
| Plaintiff's Exhibit 2 – Centennial Security | XII | 53 | AA2400- |
| Daily Activity Logs May 14-16, 2008 | | | AA2421 |
| Plaintiff's Exhibit 3 – Deposition Transcript | XII | 54 | AA2422- |
| of Renato Sumera, RN taken on May 1, | | | AA2461 |
| 2015 | | | |
| Plaintiff's Exhibit 4 – Universal Health | XII | 55 | AA2462- |
| Services Incident Report dated May 15, | | | AA2464 |
| 2008 | | | |
| Plaintiff's Exhibit 5 – Complaint for Money | XII | 56 | AA2465- |
| Damages, Cagnina v. Centennial Hills | | | AA2489 |
| Hospital Medical Center, et al., Case No. | | | |
| A570756, filed September 2, 2008 and First | | | |
| Amended Complaint for Money Damages, | | | |
| Cagnina v. Centennial Hills Hospital | | | |
| Medical Center, et al., Case No. A570756, | | | |
| filed April 28, 2010 | | | |
| Plaintiff's Exhibit 6 – Deposition Transcript | XIII | 57 | AA2490- |
| of Christine Murray dated January 27, 2010 | | | AA2566 |
| Plaintiff's Exhibit 7 – Deposition Transcript | XIII | 58 | AA2567- |
| of Amy Bochenek dated March 10, 2010 | | | AA2589 |
| Plaintiff's Exhibit 8 – Deposition Transcript | XIII | 59 | AA2590- |
| of Amy Blasing, MSN, RN dated July 28, | | | AA2621 |
| 2015 | | | |
| Plaintiff's Exhibit 9 – Rule 16.1 Mandatory | XIII | 60 | AA2622 |
| Pretrial Discovery Requirements | | | |
| Plaintiff's Exhibit 10 – Public Defender's | XIV | 61 | AA2623- |
| Office E-mails | | | AA2757 |
| Plaintiff's Exhibit 10a – Chronology of | XIV | 62 | AA2758- |
| Public Defender's Office E-mails | | | AA2790 |

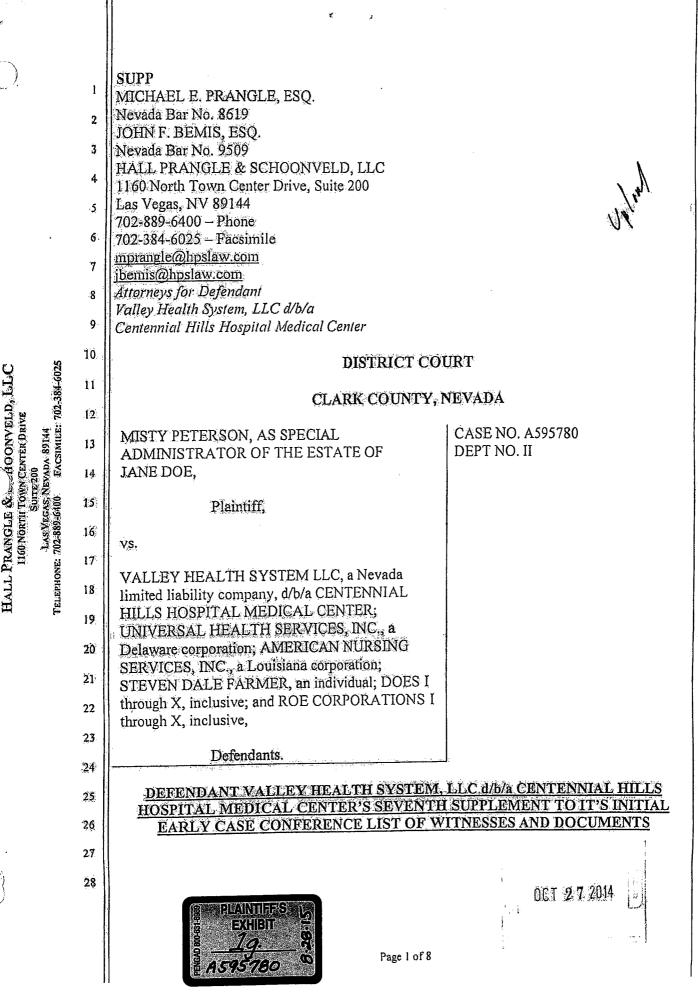
| Document Title: | Volume | Tab | Page Nos.: |
|---|-------------|-------------|------------|
| | <u>No.:</u> | <u>No.:</u> | |
| Plaintiff's Exhibit 11 – Letter from Amy | XIV | 63 | AA2791 |
| Feliciano to McBride, Bemis & Vogel dated | | | |
| January 31, 2013 | | | |
| Plaintiff's Exhibit 12 – Notice of Entry of | XIV | 64 | AA2792- |
| Order Re: Discovery Commissioner's | | | AA2804 |
| Report and Recommendations dated May 6, | | | |
| 2013 | | | |
| Plaintiff's Exhibit 13 – Christine Murray | XIV | 65 | AA2805- |
| Voluntary Statement to Las Vegas | | | AA2820 |
| Metropolitan Police Department dated June | | | |
| 13, 2008 | | | |
| Plaintiff's Exhibit 14 – Margaret Wolfe | XIV | 66 | AA2821- |
| Voluntary Statement to Las Vegas | | | AA2834 |
| Metropolitan Police Department dated May | | | |
| 30, 2008 | | | |
| Plaintiff's Exhibit 15 - Defendants Valley | III | 16 | AA0566- |
| Health System LLC d/b/a Centennial Hills | | | AA0580 |
| Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Objection to | | | |
| Discovery Commissioner Report and | | | |
| Recommendation filed July 30, 2015 | | | |
| Plaintiff's Exhibit 16 – Defendant Valley | XIV | 67 | AA2835- |
| Health Systems, LLC d/b/a Centennial Hills | | | AA2850 |
| Hospital Medical Center's Motion for | | | |
| Protective Order filed June 19, 2013 | | | |
| Plaintiff's Exhibit 17 – Discovery | XIV | 68 | AA2851- |
| Commissioner's Report and | | | AA2856 |
| Recommendation filed September 4, 2013 | | | |
| Plaintiff's Exhibit 18 – Defendants | Ι | 6 | AA0099- |
| Centennial Hills Hospital and Universal | | | AA0112 |
| Health Services, Inc.'s Opposition to | | | |
| Plaintiff's Motion for Summary Judgment | | | |
| Re: Liability and Joinder to Defendant | | | |
| Steven Dale Farmer's Limited Opposition | | | |
| filed October 14, 2014 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 19 – Petitioners Valley | III | 11 | AA0363- |
| Health System, LLC, d/b/a Centennial Hills | | | AA0406 |
| Medical Center's and Universal Health | | | |
| Services, Inc.'s Petition for Writ of | | | |
| Mandamus and/or Writ of Prohibition filed | | | |
| April 29, 2015 | | | |
| Plaintiff's Exhibit 20 – Rule 3.3 Candor | XIV | 69 | AA2857 |
| Toward Tribunal | | | |
| Plaintiff's Exhibit 21 – Recorder's | IV | 17 | AA0581- |
| Transcript of Proceedings – Plaintiff's | | | AA0601 |
| Motion for NRCP 37 Sanctions Against | | | |
| Valley Health System LLC d/b/a Centennial | | | |
| Hills Hospital Medical Center and Universal | | | |
| Health Services filed August 4, 2015 | | | |
| Plaintiff's Exhibit 22 – Deposition | XV | 70 | AA2858- |
| Transcript of Christine Murray dated | | | AA2880 |
| January 8, 2015 | | | |
| Plaintiff's Exhibit 23 – Deposition | XV | 71 | AA2881- |
| Transcript of Sajit Pullarkat dated August 7, | | | AA2896 |
| 2015 | | | |
| Plaintiff's Exhibit 24 – Deposition | XV | 72 | AA2897- |
| Transcript of PMK of Centennial Hills | | | AA2908 |
| Hospital (Sajit Pullarkat) dated August 7, | | | |
| 2015 | | | |
| Plaintiff's Exhibit 25 – Deposition | XV | 73 | AA2909- |
| Transcript of Janet Calliham dated August | | | AA2964 |
| 18, 2015 | | | |
| Plaintiff's Exhibit 26 – Deposition | XV | 74 | AA2965- |
| Transcript of Margaret Wolfe, RN dated | | | AA2984 |
| May 5, 2015 | | | |
| Plaintiff's Exhibit 27 – Defendant Valley | XV | 75 | AA2985- |
| Health System, LLC's Responses to | | | AA2989 |
| Plaintiff's Eleventh Set of Interrogatories | | | |
| dated June 12, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 28 – Defendant Valley | XV | 76 | AA2990- |
| Health System, LLC's Responses to | | | AA2993 |
| Plaintiff's Tenth Set of Interrogatories dated | | | |
| June 10, 2015 | | | |
| Plaintiff's Exhibit 29 – Las Vegas | XVI | 77 | AA2994- |
| Metropolitan Police Department's Criminal | | | AA3185 |
| file of Steven Dale Farmer bates labeled | | | |
| LVMPD00001-LVMPD00190 with | | | |
| Privilege Log (Exhibit W to Defendant | | | |
| Valley Health System, LLC d/b/a | | | |
| Centennial Hills Hospital Medical Center's | | | |
| Seventh Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated October 27, 2014) | | | |
| Plaintiff's Exhibit 30 – Excerpts of | XVII | 78 | AA3186- |
| Deposition of Carol Butler dated June 9, | | | AA3201 |
| 2015 | | | |
| Plaintiff's Exhibit 31 – Excerpts of | XVII | 79 | AA3202- |
| Deposition of Renato Sumera, RN dated | | | AA3213 |
| May 1, 2015 | | | |
| Plaintiff's Exhibit 32 – Excerpts of | XVII | 80 | AA3214- |
| Deposition of Margaret Wolfe, RN dated | | | AA3221 |
| May 5, 2015 | | | |
| Plaintiff's Exhibit 33 – Excerpts of | XVII | 81 | AA3222- |
| Deposition of Amy Blasing, MSN, RN | | | AA3246 |
| dated July 28, 2015 | | | |
| Plaintiff's Exhibit 34 – Excerpts of | XVII | 82 | AA3247- |
| Deposition of Christine Murray, RN dated | | | AA3251 |
| January 8, 2015 | | | |
| Plaintiff's Exhibit List from Vault | X | 34 | AA1864- |
| | | | AA1866 |
| Plaintiff's Motion for NRCP 37 Sanctions | III | 12 | AA0407- |
| Against Valley Health System LLC, d/b/a | | | AA0468 |
| Centennial Hills Hospital Medical Center | | | |
| and Universal Health Services, LLC filed | | | |
| April 29, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|-------------|------|------------|
| | <u>No.:</u> | No.: | |
| Plaintiff's Motion for Summary Judgment | Ι | 4 | AA0022- |
| Re: Liability filed September 29, 2014 | | | AA0093 |
| Plaintiff's Opposition to Defendant's Valley | IX | 26 | AA1590- |
| Health System LLC d/b/a Centennial Hills | | | AA1821 |
| Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Motion for | | | |
| Reconsideration of this Court's November | | | |
| 4, 2015 Order filed December 2, 2015 | | | |
| Reply in Support of Motion for | Х | 28 | AA1825- |
| Reconsideration filed December 4, 2015 | | | AA1838 |
| Reply to Defendant Valley Health System, | III | 15 | AA0490- |
| LLC d/b/a Centennial Hills Hospital | | | AA0565 |
| Medical Center and Universal Health | | | |
| Services, Inc.'s Opposition to Plaintiff's | | | |
| Motion for NRCP 37 Sanctions filed May | | | |
| 21, 2015 | | | |
| Reply to Defendants' Oppositions to | II | 8 | AA0117- |
| Plaintiff's Motion for Summary Judgment | | | AA0343 |
| Re: Liability filed November 21, 2014 | | | |
| Reporter's Transcript of Evidentiary | VI & | 22 | AA0949- |
| Hearing and Motions held on August 28, | VII | | AA1175 |
| 2015 | | | |
| Stipulation and Order for Dismissal with | Х | 31 | AA1848- |
| Prejudice filed February 29, 2016 | | | AA1853 |
| Transcript of Proceedings – Defendant | XVII | 83 | AA3252- |
| Valley Health System LLC d/b/a Centennial | | | AA3305 |
| Hills Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Motion for | | | |
| Reconsideration of this Court's November | | | |
| 4, 2015 Order | | | |

TAB 45



AA2297

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS 1 HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its 2 3 attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits 4 its Seventh Supplement to its NRCP 16.1 List of Witnesses and Documents as follows 5 (supplements provided in **bold**): 6 I. 7 WITNESSES 8 9 1. Jane Doe c/o Robert E. Murdock, Esq. 10 MURDOCK & ASSOCIATES, CHTD. 702-384-6025 Hall Prangle & Choonveld, LLC 521 South Third Street H Las Vegas, Nevada 89101 12 1160 NORTH TOWN CENTER DRIV LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: Jane Doe is expected to testify as to the facts and circumstances surrounding this matter 13 and her alleged damages. 14 SUITE 200 Jane Doe's two sons 2. 15 Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding 16 this matter, their mother's alleged damages and conversations they had with their mother about the incident. 17 18 Steven Dale Farmer 3. c/o Robert C. McBride, Esq. 19 MANDELBAUM ELLERTON & MCBRIDE 2012 Hamilton Lane 20 Las Vegas, Nevada 89106 21 Mr. Farmer is expected to testify as to the facts and circumstances surrounding this 22 matter and the allegations made against him. 23 Debra Scott, MSN, RN, FRE 4. 24 **Executive Director** Nevada State Board of Nursing 25 5011 Meadowwood Mall Way, Suite 300 Reno, NV 89502-6567 26 27 Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The 28

Page 2 of 8

Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

| 5. | Michael Egstad, Manager I |
|----|---|
| | Licensing and Certification Program |
| | California Department of Public Health (CDPH) |
| | ATCS - MS 3301 |
| | P.O. Box 997416 |
| | 1615 Capitol Avenue |
| | Sacramento, CA 95899-7416 |

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

| 6. | Collado Jeunnesse, RN |
|----|-----------------------|
| | Kim Moon, RN |
| | Abraham Deppa, CNA |
| | Nikki Carter, CNA |
| | Marina McDowell, CNA |
| | Alana Schons, CNA |
| | Nelina Arante, RN |
| | Ronald Lodevico |
| | Venise Abelard, CNA |
| | Paula Mosley, RN |
| | Pamela Flagg, CNA |
| | Amber Vergara |
| | Loretta Korinis |
| | |
| | Michelle Lucas |

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

| 7. | Curtis E. Bazemore, M.D. |
|----|--------------------------|
| | Cobinder S. Chopra, M.D. |
| | James E. Mock, M.D. |

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

27 28

3

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

23

24

FACSIMILE: 702-384-6025

89144

LAS VEGAS,

FELEPHONE: 702-889-6400

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive

| 1 | | · · · |
|---|---------------------------------|---|
| - *** | 1 2 3 4 5 6 7 | 8. Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., c/o LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| | 8 9 | 9. Crystal Johnson 4650 North Rainbow Blvd., #2109 Las Vegas, NV 89108 714-580-5383 |
| .D, LL.C E 02-384-6025 | 10 11 12 | Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. |
| PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Ne: 702-889-6400 Facsimile: 702-384-6025 | 13 14 | 10. Douglas Nichols c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 |
| L PRANGLE & - 1160 North Tow Sut Las Vegas, N Ione: 702-889-6400 | 15 16 17 | Las Vegas, NV 89144 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this matter. |
| HALL PI 1 Telephone: | 17 18 19 | 11. Mary Jo Solon Southwest Medical Associates |
| | 20 21 22 | Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. Matthew Ross Rawson-Neal Psychiatric Hospital 1650 Community College Dr. |
| | 23 24 25 | Las Vegas, NV 89146 Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. |
| ۱, | 26 27 28 | 13. Michelle Simmons 5336 Fireside Ranch Ave. Las Vegas, NV 89131 |
| } | | Page 4 of 8 |

剩

| 4 | | · . | |
|--|---|---|--|
| \bigcirc | 1 | Ms. Simmons is expected to testify as to the facts and circumstances surrounding this matter. | |
| HALL PRANGLE CHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 | | |
| \bigcirc | 27 28 | (Exhibit G) | |
| | | Page 5 of 8 | |

3

LANGLE & CHOONVELD, LLC 160 North Town Center Drive Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 SUITE 200 HALL PRANGLE &

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

 Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)

- Broadlane, Inc. Contract dated 08/12/2007
 Bates Numbered BROADLANE000001 000050 (Exhibit I)
- 10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)
- Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 - CHH00321 (Exhibit K)
- 12. Privilege Log for Schedule of Steven Dale Farmer (Exhibit L)
- Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 - CHH00325 (Exhibit M)
- 14. Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N)
- Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 - CHH00365 (Exhibit O)
- Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)
- Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 - CHH00372 (Exhibit Q)
- 18. Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 CCAMH00022 (Exhibit R attached hereto via CD)
- 19. Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 Chop00038 (Exhibit S attached hereto via CD)
- Medical Records from MountainView Hospital bates labeled MVH00001 MVH00159 (Exhibit T attached hereto via CD)

| | ļ | | | |
|--|-------------|--|--|--|
| ar de la companya de | 1 | Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD) | | |
| | 2 3 | 22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD) | | |
| | 4 5 6 | 23. Las Vegas Metropolitan Police Department's Criminal File of Steven Dale Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. (Exhibit W attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. | | |
| | 7 8 9 | 24. Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. | | |
| HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 felephone: 702-889-6400 Facsimile: 702-384-6025 | 10 11 | 25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. | | |
| CHOONVELI CENTER DRIVE 200 VADA 89144 FACSIMILE: 70 | 12 13 | 26. Defendant reserves the right to supplement this list of documents. | | |
| CHO V CENT 200 FACS | 14 | 27. Defendant reserves the right to utilize any document utilized or identified by any | | |
| LE & CHO RTI TOWN CEN SUITE 200 VEGAS, NEVADA 89-6400 FAC | 15 | other party to this litigation. | | |
| RANGLE 1160 North Las Vec 2: 702-889-6 | 16 | DATED this 27 th day of October, 2014. | | |
| HALL PRANGLE & 1160 North To Sur Las Vegas, Telephone: 702-889-6400 | 17 18 | HALL PRANGLE & SCHOONVELD, LLC | | |
| HA | 19 | | | |
| | 20 | By: <u>/s/: John Bemis</u> MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 | | |
| | 21 | JOHN F. BEMIS, ESQ. | | |
| | 22 | Nevada Bar No. 9509 1160 North Town Center Drive, Suite 200 | | |
| | 23 | Las Vegas, NV 89144 | | |
| | 24 | Attorneys for Defendant Valley Health System, LLC d/b/a | | |
| | 25 | Centennial Hills Hospital Medical Center | | |
| | 26 | | | |
| | 27 | | | |
|) | 28 | ••• | | |
| | | Page 7 of 8 | | |

ć

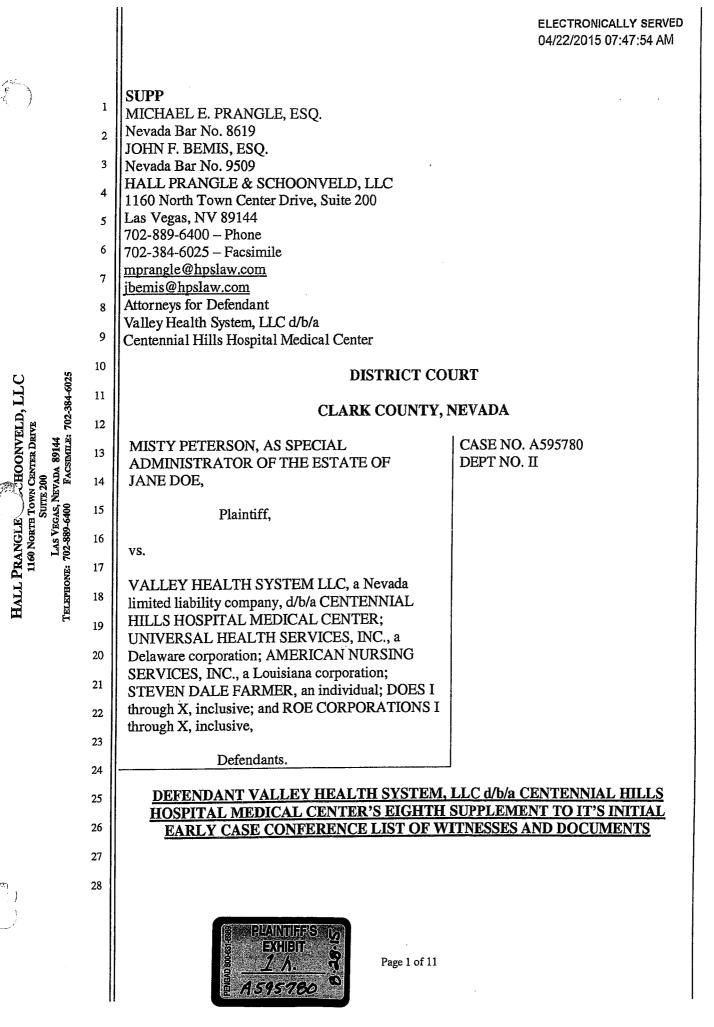
E.

AA2303

| 2 | | | |
|---|----------|--|--|
| | 1 | | <u>Jane Doe v. Centennial Hills, et al.</u> |
| | 2 | RECEIPT | <u>OF COPY</u> |
| | 3 | RECEIPT OF COPY of DEFENDANT | VALLEY HEALTH SYSTEM, LLC d/b/a |
| | 4 | CENTENNIAL HILLS HOSPITAL MEDIC | AL CENTER'S SEVENTH SUPPLEMENT |
| | 5: 6: | TO IT'S INITIAL EARLY CASE CON | FERENCE LIST OF WITNESSES AND |
| | 7 | DOCUMENTS is hereby acknowledged on the f | following dates by the following parties: |
| | 8 | DATED this <u></u> day of October, 2014. | DATED this day of October, 2014. |
| | 9 | A | |
| E C | 10 | Robert & Murdock / | S. BRENT VOGEL, ESQ. |
| 0, L.L. | п | 521 South Third Street LAS VEGAS, NV 89101 | LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 |
| CHOONVELD, LLC CHOONVELD, LLC ACENTER DRIVE 200 EVEN 89144 EVENMILE 702-384-6025 | 12 13 | Attorneys for Plaintiff | Las Vegas, NV 89118 -and- |
| CENTED CENTED CENTED CENTED CENTED CENTED | 13 | DATED this day of October, 2014. | DATED this day of October, 2014. |
| Surr Surr AS, N | 15 | | |
| LL PRANGLE C- L160 NORTI TOV Sur LAS VEGASA | 16 | ROBERT C. MCBRIDE, ESQ. | JAMES P.C. SILVESTRI, ESQ. |
| LL PR | 17 | CARROLL, KELLY, TROTTER, FRANZEN, | 701 Bridger Ave., Suite 600 Las Vegas, NV 89101 |
| BAL | 18 | MCKENNA & PEABODY 701 North Green Valley Parkway, Suite 200 | Attorneys for Defendant American Nursing Services, Inc. |
| | 19 20 | Henderson, Nevada 89074 Attorneys for Defendant | American ivar sing ber vices, inc. |
| | 21 | Steven Dale Farmer | |
| · | 22 | | |
| | 23 | 4833-3895-2992, v. 1 | |
| | 24, | | |
| | 25 | | |
| | 26 27 | | |
| | 28 | | |
| | | | |
| | | Page 8 | of 8 |

AA2304

TAB 46



HALL PRANGLE

AA2305

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its Eighth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

Jane Doe

 c/o Robert E. Murdock, Esq.
 MURDOCK & ASSOCIATES, CHTD.
 521 South Third Street
 Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

702-384-6025

LAS VEGAS, NEVADA 89144 702-889-6400 FACSIMILE:

TELEPHONE:

HALL PRANGLE & HOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

Steven Dale Farmer
 c/o Robert C. McBride, Esq.
 MANDELBAUM ELLERTON & MCBRIDE
 2012 Hamilton Lane
 Las Vegas, Nevada 89106

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

| 24 25 | Debra Scott, MSN, RN, FRE Executive Director Nevada State Board of Nursing 5011 Meadowwood Mall Way, Suite 300 |
|----------|---|
| 26 | 5011 Meadowwood Mall Way, Suite 300 Reno, NV 89502-6567 |

Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

| California Der ATCS - MS 3 P.O. Box 9974 1615 Capitol A | Certification Program partment of Public Health (CDPH) 301 416 Avenue |
|--|---|
| Sacramento, C | CA 95899-7416 |

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

| 7. | Curtis E. Bazemore, M.D. |
|----|--------------------------|
| | Cobinder S. Chopra, M.D. |
| | James E. Mock, M.D. |

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

28

27

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

FACSIMILE: 702-384-6025

89144

LAS VEGAS. NEVADA

TELEPHONE: 702-889-6400

HALL PRANGLE CONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

| 1 | 8. | Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., |
|----------|---------------------------------|--|
| 2 3 | | c/o LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 |
| 4 | | Las Vegas, NV 89118 |
| 5 6 | testify in reg questions inc | above described witnesses are expected to be identified during discovery and to ards to all facts and circumstances surrounding Steven Farmer and the incident in cluding but not limited to investigations performed, background checks performed |
| 7 | regarding Ste | even Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| 8 | 9. | Crystal Johnson 4650 North Rainbow Blvd., #2109 |
| 9 10 | | Las Vegas, NV 89108 714-580-5383 |
| 11 | Ms. J matter. THIS | ohnson is expected to testify as to the facts and circumstances surrounding this INDIVIDUAL IS REPRESENTED BY COUNSEL. |
| 12 13 | 10. | Douglas Nichols |
| 14 | | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 |
| 15 | | Las Vegas, NV 89144 |
| 16 17 | Mr. M matter. | Nichols is expected to testify as to the facts and circumstances surrounding this |
| 18 19 | 11. | Mary Jo Solon Southwest Medical Associates |
| 20 | Ms. S | olon is expected to testify as to the facts and circumstances surrounding this matter. |
| 21 | 12. | Matthew Ross |
| 22 23 | | Rawson-Neal Psychiatric Hospital 1650 Community College Dr. Las Vegas, NV 89146 |
| 24 | Ma D | Las vegas, it vestify as to the facts and circumstances surrounding this matter. |
| 25 | | |
| 26 | 13. | Michelle Simmons 5336 Fireside Ranch Ave. Las Vegas, NV 89131 |
| 27 | | End Compart of the |
| 28 | | |
| | | Page 4 of 11 |

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facemale: 702-384-6025

)

ALC: N

| 1 | Ms. matter. | Simmons is expected to testify as to the facts and circumstances surrounding this |
|----|----------------|---|
| 2 | | |
| 3 | 14. | Salvatore Sparacino c/o John F. Bemis, Esq. |
| 4 | | HALL PRANGLE & SCHOONVELD, LLC |
| 5 | | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| 6 | Mr. | Sparacino is expected to testify as to the facts and circumstances surrounding this |
| 7 | matter. | |
| 8 | 15. | Nida Canque (702) 301-0433 |
| 9 | 16. | Asuncion Layug |
| 10 | | 6628 MacDoogle Street |
| 11 | | Las Vegas, NV 89166 Ph: (702) 405-7919 |
| 12 | 17. | Alexe Brown-Gay |
| 13 | 17. | 5973 Spinnaker Point Avenue |
| 14 | | Las Vegas, NV 89110 Ph: (702) 438-2860 |
| 15 | | |
| 16 | 18. | Emma Cortez 1835 Pallid Swift Court |
| 17 | | North Las Vegas, NV 89084 |
| 18 | | Ph: (702) 292-8330 |
| 19 | 19. | Maria Dakudo 5201 Meadows Lily Avenue |
| 20 | | Las Vegas, NV 89108 |
| 21 | | Ph: (702) 545-0938 |
| 22 | 20. | Janette Luoang 455 E. Twain Avenue, #144 |
| 23 | | Las Vegas, NV 89169 |
| 24 | | Ph: (213) 839-3915 |
| 25 | 21. | Tiffiney Bills |
| 26 | | 4230 Valley Regents Drive North Las Vegas, NV 89032 |
| 27 | | Ph: (702) 443-4813 |
| 28 | 111 | |
| | | |
| | | |
| | | Page 5 of 11 |
| | | |

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Sulte 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

PRANGLE CHOONVELD, LLC 1160 NORTH TOWN CENTER DRIVE 702-384-6025 LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: SUITE 200 HALL PRANGLE

22.

23.

24.

25.

26.

27.

28.

29.

30.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

117

111

Deepa Abraham

Las Vegas, NV 89115

4516 Mohawk River Avenue North Las Vegas, NV 89031

7835 S. Rainbow Blvd. #1771

3829 Moonshine Falls Avenue North Las Vegas, NV 89085

Unknown Contact Information

15757 N 90th Place #1077

6765 Tulip Falls Drive, #2050

Scottsdale, AZ 85260

Las Vegas, NV 89011

Ph: (702) 418-2618

Ph: (314) 221-5914

Ph: (702) 643-6634

Ph: (702) 541-6630

Las Vegas, NV 89131

Ph: (702) 897-0708

8613 Dodds Canyon

Las Vegas, NV 89131

Ph: (702) 332-2423

Ph: (702) 595-9205

Ph: (702) 396-1784

6913 Puetollano Drive North Las Vegas, NV 89084

Pierre

Salcedo

Walker

Dechavez

Gayle

Mosley

Mosely P

4515 N. Las Vegas Blvd., Bldg, 78 #1003

Cindy Parmalee, former Nursing Clinical Supervisor

Page 6 of 11

| | | 31. Schuele | | | | | |
|--|----|---|--|--|--|--|--|
| ^{ال} الاروپية | 1 | 5277 Drifting Sands Court | | | | | |
| | 2 | Las Vegas, NV 89149 | | | | | |
| | | Ph: (503) 338-8864 | | | | | |
| | 3 | | | | | | |
| | 4 | 32. Stringer 5125 Costabella Lane | | | | | |
| | 5 | Las Vegas, NV 89130 | | | | | |
| | 5 | Ph: (702) 459-9043 | | | | | |
| | 6 | | | | | | |
| | 7 | 33. Wescott | | | | | |
| | 8 | Unknown | | | | | |
| | 0 | 34. Ramona Albunan, former Charge Nurse | | | | | |
| | 9 | Ph: (702) 982-8767 | | | | | |
| HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 Ielephone: 702-889-6400 Facemile: 702-384-6025 | 10 | Ph: (440) 840-4740 | | | | | |
| | 11 | 35. Vicky Johnson, former Director of Nursing | | | | | |
| | 11 | Ph: (702) 806-5208 | | | | | |
| ELD IVE : 702 | 12 | | | | | | |
| NV R DR 9144 MILE | 13 | The above-named individuals, Canque – Johnson (#15-35), are former employee | | | | | |
| HOC ENTE DA 8 ACSI | | Defendant, Valley Health System, LLC, and have been identified by Defendant as having | | | | | |
| Town Ce Surre 200 As, Neval | 14 | worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor in February and/or March of 2008, and may have knowledge and information about | | | | | |
| RANGLE & CHOONVEL 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 1: 702-889-6400 Facsimule: 70 | 15 | the alleged incident with the elderly patient to which Nurse Murray referred in her | | | | | |
| ANGLE & | 16 | deposition testimony. Defendant has provided the foregoing individuals' last known | | | | | |
| LAN 60 N | | contact information, and has made efforts to verify the accuracy of such contact | | | | | |
| | 17 | information to the best of its ability. | | | | | |
| HALL PR 11 Telephone: | 18 | 36. LilibethParejas, RN | | | | | |
| | 19 | 37. Bernadine Rebogio, RN | | | | | |
| | | 38. Janice Collado, RN | | | | | |
| | 20 | 39. Darlene Infante Carbonell, RN40. Maria Dacquell, CNA | | | | | |
| | 21 | 40. Maria Dacquell, CNA 41. Rhona Lopez | | | | | |
| | 22 | 42. Aman McPherson | | | | | |
| | | 43. Ailynne Belbis | | | | | |
| | 23 | 44. Larena Abdul | | | | | |
| | 24 | 45. Rebecca Cronister c/o John F. Bemis, Esq. | | | | | |
| | 25 | HALL PRANGLE & SCHOONVELD, LLC | | | | | |
| | 25 | 1160 North Town Center Drive, Suite 200 | | | | | |
| | 26 | Las Vegas, NV 89144 | | | | | |
| | 27 | The above-named individuals, Parejas – Cronister (#36-45), are current employees | | | | | |
| | 28 | of Defendant, Valley Health System, LLC, and have been identified by Defendant as having | | | | | |
| Y T | 28 | | | | | | |
| | | | | | | | |

worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testimony.

46. Defendant reserves the right to supplement its list of witnesses.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

702-384-6025

FACSIMILE:

LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE:

HALL PRANGLE CHOONVELD, LLC 1160 NORTH TOWN CENTER DRIVE

SUITE 200

Defendant reserves the right to call any witnesses identified by any other parties 47. in this litigation.

II.

DOCUMENTS

- Jane Doe's medical records Bates Stamped CH00001 through CH00317 1. (Exhibit A on CD).
- Centennial Hills Hospital Daily Security Logs 2. Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD).
- Records produced by Nevada State Board of Nursing 3. (Exhibit C on CD).
- Centennial Hills Hospital Job Description for CNA 4. Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD).
- Daily Patient Assignment Sheets for the 6th Floor dated 05/13/2008 -5. 05/18/2008. Bates Numbered ASSIGN000001-000012 (Exhibit E)
- Critical Care Services Assignment Sheets for the 5th Floor dated 05/13/2008 -6. 05/18/2008. Bates Numbered ASSIGN000013 - 000023 (Exhibit F)
- Emergency Department Daily Assignments dated 05/13/2008 05/18/2008. 7. Bates Numbered ASSGIN000024 - 000035 (Exhibit G)
- Steven Dale Farmer Staffing Sheets. 8. Bates Numbered STAFF000001 - 000003 (Exhibit H)
- Broadlane, Inc. Contract dated 08/12/2007 9. Bates Numbered BROADLANE000001 - 000050 (Exhibit I)

| 1 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J) |
|----------------|-----|--|
| 2 3 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K) |
| 4 5 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) |
| 6 7 8 | 13. | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 – CHH00325 (Exhibit M) |
| 9 10 | 14. | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N) |
| 11 12 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 – CHH00365 (Exhibit O) |
| 13 14 | 16. | Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P) |
| 15 16 17 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372 (Exhibit Q) |
| 18 19 | 18. | Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD) |
| 20 21 | 19. | Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 – Chop00038 (Exhibit S attached hereto via CD) |
| 22 23 | 20. | Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD) |
| 24 25 | 21. | Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD) |
| 26 27 | 22. | Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD) |
| 28 | 111 | |
| | 1 | Page Q of 11 |

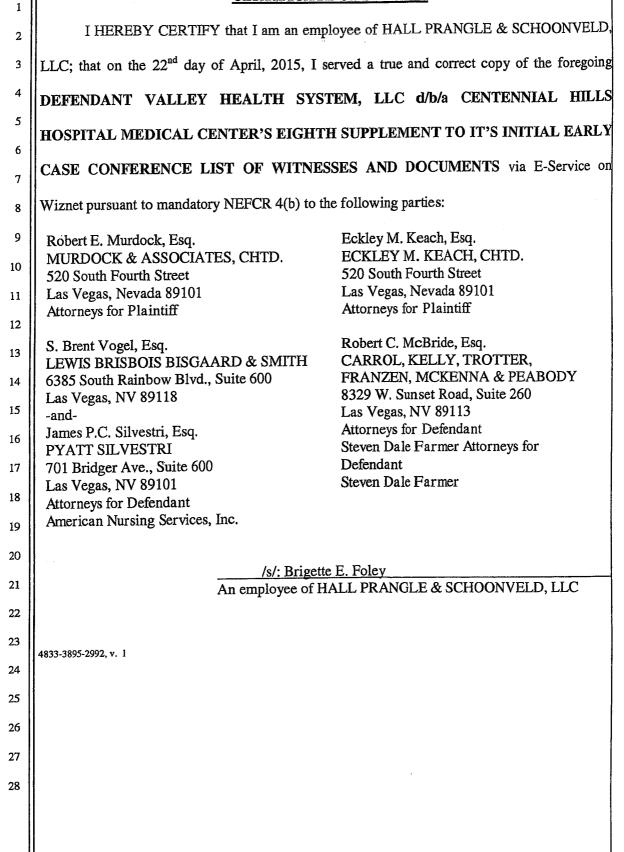
HALL PRANGLE CHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telefbone: 702-889-6400 Facsmule: 702-384-6025

C. T

| | 1 2 | 23. | Las Vegas Metropolitan Police Department's Criminal File of Steven Dale Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. (Exhibit W attached hereto via CD) |
|--|----------|----------------|--|
| | | | CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| | 3 4 | 24. | Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. |
| | 5 | | (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| | 6 | 25. | Les Voces Motronalitan Police Denartment's Audio File of 911 Cell |
| | 7 | 23. | Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD) |
| | 8 | | CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| | 9 | 26. | Defendant reserves the right to supplement this list of documents. |
| CHOONVELD, LLC CENTER DRIVE 00 FACSIMILE: 702-384-6025 | 10 | 27. | Defendant reserves the right to utilize any document utilized or identified by any |
| | 11 | other party to | this litigation. |
| OONVEL TER DRIVE 89144 SIMILE: 70 | 12 | DATE | ED this 22 nd day of April, 2015 |
| CHOONVE CENTER DRIV 2008 200 2014 2014 2014 2015 2014 | 13 | | HALL PRANGLE & SCHOONVELD, LLC |
| DWN CI DWN CI NEVAL | 14 | | HALL FRANCLE & SCHOON VELD, LLC |
| HALL PRANGLE C HO 1160 North Town Cent Suite 200 Las Vegas, Nevada Telefione: 702-389-6400 Fac | 15 | | By: <u>/s/: Brigette E, Foley, NV Bar No. 12965 for:</u> |
| RANG 160 Nc Las : 702-8 | 16 17 | | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 |
| HALL PRANGLE 1160 north Las Veg Las Veg | 17 | | JOHN F. BEMIS, ESQ. |
| HA | 19 | | Nevada Bar No. 9509 1160 North Town Center Drive, Suite 200 |
| | 20 | | Las Vegas, NV 89144 Attorneys for Defendant |
| | 21 | | Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center |
| | 22 | | Centeninar mins Hospitar Medicar Center |
| | 23 | | |
| | 24 | | |
| | 25 | | |
| | 26 | | |
| | 27 | | |
| * | 28 | | |
|) ~~~ | | | |
| | | | |
| | | | Page 10 of 11 |
| | | | |

AA2314

CERTIFICATE OF SERVICE



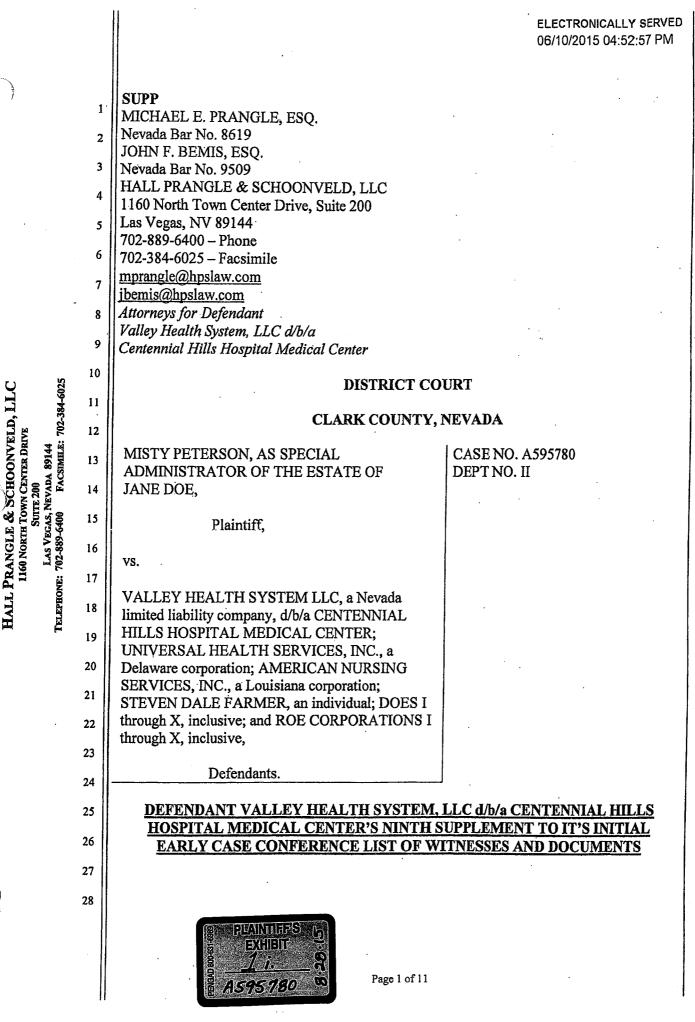
702-384-6025

LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE:

SUITE 200

HOONVELD, LLC

HALL PRANGLE & HOONVEL 1160 North Town Center Drive TAB 47



AA2316

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS 1 HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its 2 attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its Ninth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

1. Jane Doe c/o Robert E. Murdock, Esq. MURDOCK & ASSOCIATES, CHTD. 521 South Third Street Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

18 19

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

20

21

22

23

FACSIMILE: 702-384-6025

Nevada 89144

LAS VECAS, 1 TELEPRONE: 702-889-6400

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

3. Steven Dale Farmer c/o Robert C. McBride, Esq. CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY 701 North Green Valley Parkway, Suite 200 Henderson, Nevada 89074

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

4. Debra Scott, MSN, RN, FRE 24 Executive Director Nevada State Board of Nursing 25 5011 Meadowwood Mall Way, Suite 300 26 Reno, NV 89502-6567

27 Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. 28 The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

5. Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301

- P.O. Box 997416
 - 1615 Capitol Avenue

Sacramento, CA 95899-7416

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. 22

7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D.

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

28

FACSIMILE: 702-384-6025 HALL PRANGLE & SCHOONVELD, LLC 1160 NORTH TOWN CENTER DRIVE SUITE 200 Las Vegas, Nevada 89144 Felephone: 702-889-6400 Facsimile: 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

23

24

25

26

| HALL PRANGLE & SCHOONVELD, LLC 1160 NORTH TOWN CENTER DRIVE SUITE 200 LAS VECAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025 | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | 8. Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., c/o LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. 9. Crystal Johnson 4650 North Rainbow Blvd., #2109 Las Vegas, NV 89108 714-580-5383 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. 10. Douglas Nichols c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 |
|---|---|--|
| | 16 17 18 19 20 | Las Vegas, NV 89144 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this matter. 11. Mary Jo Solon Southwest Medical Associates Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. |
| | 21 22 23 24 25 26 27 | Matthew Ross Rawson-Neal Psychiatric Hospital 1650 Community College Dr. Las Vegas, NV 89146 Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. Michelle Simmons 5336 Fireside Ranch Ave. Las Vegas, NV 89131 |
| | 28 | Page 4 of 11 |

| | 1 | | Ms. | Simmons is expected to testify as to the facts and circumstances surrounding this | |
|--|----|-------------|-----|---|--------|
| | 2 | matter. | | | |
| | | | 14. | Salvatore Sparacino | |
| | 3 | | | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC | |
| | 4 | | | 1160 North Town Center Drive, Suite 200 | |
| | 5 | | | Las Vegas, NV 89144 | |
| | 6 | | Mr. | Sparacino is expected to testify as to the facts and circumstances surrounding this | |
| | 7. | matter. | | | |
| | 8 | | 15. | Nida Canque | |
| | 9 | | | (702) 301-0433 | |
| LD, LLC ve 702-384-6025 | 10 | | 16. | Asuncion Layug | |
| | 11 | | | 6628 MacDoogle Street Las Vegas, NV 89166 | |
| | | | | Ph: (702) 405-7919 | |
| VEL DRIVE 44 LE: 7(| 12 | 2 1 1 | 17. | Alexe Brown-Gay | : ; |
| ACCINTER DRI CENTER DRI 00 ADA 89144 FACSIMILE: | 13 | | 17. | 5973 Spinnaker Point Avenue | |
| N H N | 14 | | | Las Vegas, NV 89110 | |
| | 15 | | | Ph: (702) 438-2860 | |
| NGL) Nort As Ve 2-889- | 16 | | 18. | Emma Cortez 1835 Pallid Swift Court | |
| HALL PRANGLE & 1160 North To Su Las Vecas, Telephone: 702-889-6406 | 17 | | | North Las Vegas, NV 89084 | |
| ALL | 18 | | | Ph: (702) 292-8330 | |
| H. Tar | 19 | ·] | 19. | Maria Dakudo | |
| | 20 | | | 5201 Meadows Lily Avenue Las Vegas, NV 89108 | i |
| | 21 | | | Ph: (702) 545-0938 | |
| | | | 20. | Janette Luoang | |
| | 22 | 2 | 20. | 455 E. Twain Avenue, #144 | |
| | 23 | | | Las Vegas, NV 89169 Ph: (213) 839-3915 | |
| | 24 | | | FII: (215) 659-5915 | |
| | 25 | 2 | 21. | Tiffiney Bills 4230 Valley Regents Drive | |
| | 26 | | | North Las Vegas, NV 89032 | |
| | 27 | /// | | | |
| 5 | 28 | ,,, | | | |
| } | | | | · | |
| | | | | | |
| | | · | | Page 5 of 11 | |
| | [] | | | I | 1 |

.

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Sutte 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimele: 702-384-6025

22. Deepa Abraham 1 4515 N. Las Vegas Blvd., Bldg. 78, #1003 Las Vegas, NV 89115 2 Ph: (702) 643-6634 3 Cindy Parmalee, former Nursing Clinical Supervisor 23. 4 4516 Mohawk River Avenue North Las Vegas, NV 89031 5 Ph: (702) 541-6630 6 Pierre 24. 7 7835 S. Rainbow Blvd., #1771 Las Vegas, NV 89131 8 Ph: (702) 897-0708 9 25. Salcedo 10 8613 Dodds Canyon Las Vegas, NV 89131 11 Ph: (702) 332-2423 12 26. Walker 13 3829 Moonshine Falls Avenue North Las Vegas, NV 89085 14 Ph: (702) 595-9205 15 27. Dechavez 16 6913 Puetollano Drive North Las Vegas, NV 89084 17 Ph: (702) 396-1784 18 28. Gayle 19 Unknown Contact Information 20 29. Mosley 21 15757 N 90th Place #1077 Scottsdale, AZ 85260 22 Ph: (314) 221-5914 23 30. Mosley, P 24 6765 Tulip Falls Drive, #2050 Las Vegas, NV 89011 25 Ph: (702) 418-2618 26 111 27 111 28

Page 6 of 11

| | • | |
|--|----|--|
| 1 | | 31. Schuele |
| | 1 | 5277 Drifting Sands Court |
| Į | 2 | Las Vegas, NV 89149 |
| | 3 | Ph: (503) 338-8864 |
| | 5 | 32. Stringer |
| | 4 | 5125 Costabella Lane |
| | 5 | Las Vegas, NV 89130 |
| | 6 | Ph: (702) 459-9043 |
| | | 33. Wescott |
| | 7 | Unknown |
| | 8 | |
| | 9 | 34. Ramona Albunan, former Charge Nurse |
| | | Ph: (702) 982-8767 Ph: (440) 840-4740 |
| SZ C | 10 | |
| LD, LLC ve 702-384-6025 | 11 | 35. Vicky Johnson, former Director of Nursing |
| 702.3 | 12 | Ph: (702) 806-5208 |
| ONVE TER DRI 89144 SIMILE: | 10 | The above-named individuals, Canque – Johnson (#15-35), are former employees of |
| HOONVE HOONVE Center Dri 00 Ada 89144 Facsimile: | 13 | Defendant, Valley Health System, LLC, and have been identified by Defendant as having |
| EVAN OF | 14 | worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor |
| & SCH SUITE 200 SUITE 200 AS, NEVAL | 15 | in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testify |
| UNGLE & SCHO 0 North Town Cent Sutte 200 Las Vecas, Nevada 02-889-6400 FACC | 16 | Defendant has provided the foregoing individuals' last known contact information, and has made |
| HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Druve Suffe 200 LAS VECAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-602 | | efforts to verify the accuracy of such contact information to the best of its ability. |
| | 17 | |
| ALI | 18 | 36. Lilibeth Parejas, RN37. Bernadine Rebogio, RN |
| | 19 | 38. Janice Collado, RN |
| | | 39. Darlene Infante Carbonell, RN |
| | 20 | 40. Maria Dacquell, CNA |
| | 21 | 41. Rhona Lopez42. Aman McPherson |
| | 22 | 43. Ailynne Belbis |
| | | 44. Larena Abdul |
| | 23 | 45. Rebecca Cronister |
| | 24 | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC |
| | 25 | 1160 North Town Center Drive, Suite 200 |
| | 26 | Las Vegas, NV 89144 |
| | 20 | The above named individuals Daraing Cranister (#26.45) and automate analysis of |
| | 27 | The above-named individuals, Parejas - Cronister (#36-45), are current employees of Defendant, Valley Health System, LLC, and have been identified by Defendant as having |
| | 28 | worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor |
| <u> </u> | | |
| | | |

||

Page 7 of 11

| \bigcirc | 1 | | and/or March of 2008, and may have knowledge and information about the alleged the elderly patient to which Nurse Murray referred in her deposition testify. |
|--|----------------|-----------|--|
| | 2 | 46. | Defendant reserves the right to supplement its list of witnesses. |
| | 3 | 47. | Defendant reserves the right to call any witnesses identified by any other parties in this litigation. |
| | 5 | | II. |
| | 6 | | DOCUMENTS |
| | 7 | | DOCUMENTS |
| | 8 9 | 1. | Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD). |
| | 10 | 2. | Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD). |
| HOONVELD, LLC Enter Drive Do Ado Adsimile: 702-384-6025 | 11 12 | 3, | Records produced by Nevada State Board of Nursing (Exhibit C on CD). |
| SCHOONVELD, LLC NCENTER DRIVE E 200 EVADA 89144 EVADA 89144 | 13 14 | 4. | Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD). |
| HALL PRANGLE & SCHOONVEL 1160 North Town Center Drive Sute 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 70 | 15. 16 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
| | 17 18 19 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F) |
| | 20 21 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G) |
| | 22 23 24 | 8. | Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H) |
| | 25 | 9. | Broadlane, Inc. Contract dated 08/12/2007 |
| | 26 | | Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| | 27 28 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J) |
| | | · . | Page 8 of 11 |

11. Schedule of Steven Dale Farmer at Centennial Hills Hospital from 1 April 13, 2008 through June 7, 2008 bates labeled CHH00318 - CHH00321 (Exhibit K) 2 3 12. Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) 4 Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 13. 5 bates labeled CHH00322 - CHH00325 6 (Exhibit M) 7 Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer 14. (Exhibit N) 8 9 Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled 15. CHH00326 - CHH00365 10 (Exhibit O) FACSIMILE: 702-384-6025 11 Privilege Log for Agency Payroll Spreadsheets for February 2008, 16. 12 March 2008, April 2008 and May 2008 LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: (Exhibit P) 13 Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, 17. 14 and May 2008 bates labeled CHH00366 - CHH00372 15 (Exhibit O) 16 Medical Records from Clark County Adult Mental Health bates labeled 18. CCAMH00001 - CCAMH00022 (Exhibit R attached hereto via CD) 17 18 Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001-19. Chop00038 (Exhibit S attached hereto via CD) 19 Medical Records from MountainView Hospital bates labeled MVH00001 -20. 20 MVH00159 (Exhibit T attached hereto via CD) 21 21. Medical Records from Southern Hills Hospital bates labeled Shills00001 -Shills00241 (Exhibit U attached hereto via CD) 22 23 Medical Records from University Medical Center bates labeled UMC00001 -22. UMC00209 (Exhibit V attached hereto via CD) 24 Las Vegas Metropolitan Police Department's Criminal File of Steven Dale 23. 25 Farmer bates labeled LVMPD00001 - LVMPD0190 with Privilege Log. 26 (Exhibit W attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. 27 28

HALL PRANGLE & SCHOONVELD, LL

1160 NORTH TOWN CENTER DRIVE SUITE 200

Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer 24. 1 bates labeled LVMPD0191 – LVMPD0196. (Exhibit X attached hereto via CD) 2 CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. 3 Las Vegas Metropolitan Police Department's Audio File of 911 Call 25. 4 (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. 5 6 26. Policy and Procedure - Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005) 7 Policy and Procedure - Abuse/Neglect of Neonates/Children 27. 8 (Exhibit AA attached hereto bates labeled P&P0006 - 0010) 9 28. Policy and Procedure - Abuse/Neglect of the Elderly 10 (Exhibit BB attached hereto bates labeled P&P0011 - 0013) 702-384-6025 11 Defendant reserves the right to supplement this list of documents. 29. 12 Defendant reserves the right to utilize any document utilized or identified by any 89144 30. 13 LAS VEGAS. NEVADA other party to this litigation. 14 15 DATED this 10th day of June, 2015. [ELEPHONE: 702-889-640 16 HALL PRANGLE & SCHOONVELD, LLC 17 18 By: /s/: John Bemis MICHAEL E. PRANGLE, ESQ. 19 Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. 20 Nevada Bar No. 9509 21 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 22 Attorneys for Defendant 23 Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center 24 25 26 27 28

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH. TOWN CENTER DRIV

SUITE 200

Page 10 of 11

CERTIFICATE OF SERVICE

1

FACSIMILE: 702-384-6025

FELEPHONE: 702-889-6400

HALL PRANGLE & SCHOONVELD, LLC

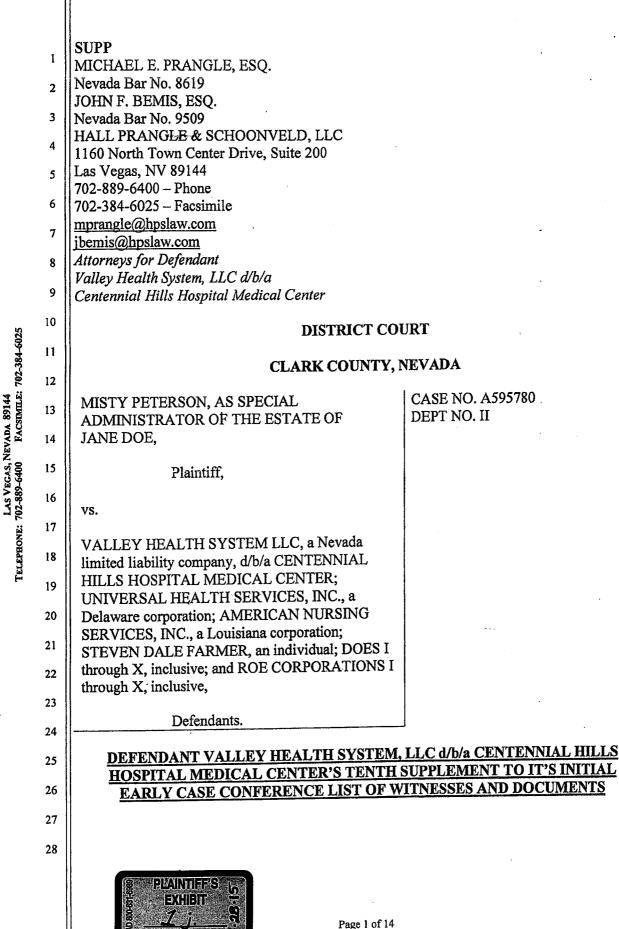
1160 NORTH TOWN CENTER DRIVI SUITE 200 LAS VECAS, NEVADA 89144

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 3 LLC; that on the 10th day of June, 2015, I served a true and correct copy of the foregoing 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S NINTH SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on 7 Wiznet pursuant to mandatory NEFCR 4(b) to the following parties: 8 9 Eckley M. Keach, Esq. Robert E. Murdock, Esq. MURDOCK & ASSOCIATES, CHTD. ECKLEY M. KEACH, CHTD. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiff Attorneys for Plaintiff 12 Robert C. McBride, Esq. S. Brent Vogel, Esq. 13 CARROL, KELLY, TROTTER, LEWIS BRISBOIS BISGAARD & SMITH FRANZEN, MCKENNA & PEABODY 14 6385 South Rainbow Blvd., Suite 600 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89118 15 -and-Las Vegas, NV 89113 Attorneys for Defendant James P.C. Silvestri, Esq. 16 Steven Dale Farmer Attorneys for PYATT SILVESTRI 701 Bridger Ave., Suite 600 Defendant 17 Steven Dale Farmer Las Vegas, NV 89101 18 Attorneys for Defendant American Nursing Services, Inc. 19 20 21 PRANGLÉ & SCHOONVELD, LLC An employee of H 22 4828-2348-7524, v. 1 23 24 25 26 27 28

Page 11 of 11

TAB 48

ELECTRONICALLY SERVED 06/16/2015 06:08:17 PM



DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD/LLC, hereby submits its Ninth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

Jane Doe 1. c/o Robert E. Murdock, Esq. MURDOCK & ASSOCIATES, CHTD. 521 South Third Street Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

702-384-6025

FACSIMILE:

LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE:

HALL PRANGLE & HOUVELD, LL

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

Steven Dale Farmer 3. c/o Robert C. McBride, Esq. CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY 701 North Green Valley Parkway, Suite 200 Henderson, Nevada 89074

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

Debra Scott, MSN, RN, FRE 4. 24 **Executive Director** Nevada State Board of Nursing 25 5011 Meadowwood Mall Way, Suite 300 26 Reno, NV 89502-6567

27 Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The 28

Page 2 of 14

Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing 1 prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 2 5. 3 Michael Egstad, Manager I Licensing and Certification Program 4 California Department of Public Health (CDPH) ATCS - MS 3301 5 P.O. Box 997416 6 1615 Capitol Avenue Sacramento, CA 95899-7416 7 Mr. Egstad is expected to testify regarding The certification process, background check 8 and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. 9 Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 10 00199703, Nurse Assistant Certificate 00659300). 11 12 6. Collado Jeunnesse, RN Kim Moon, RN 13 Abraham Deppa, CNA Nikki Carter, CNA 14 Marina McDowell, CNA 15 Alana Schons, CNA Nelina Arante, RN 16 Ronald Lodevico

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D.

Venise Abelard, CNA

Paula Mosley, RN

Loretta Korinis Michelle Lucas

Pamela Flagg, CNA Amber Vergara

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

27 28

HALL PRANGLE & HOONVELD, LLC

[160 NORTH TOWN CENTER DRIVE

SUITE 200

702-384-6025

ADA 89144 Facsimile:

FELEPHONE: 702-889-6400

17

18

19

20

21

22

23

24

25

26

LAS VEGAS,

Page 3 of 14

| | | . . | | | <i></i> | | |
|--|----|----------------------|--------------------------------------|---|--------------------------------|--------------------------------|------------------------|
| ι · | | | : | | 1.2 | | |
| _ | | | | | | • | |
| | 1 | 8. | | r employees, represe esentatives of Amer | | | |
| | 2 | | Nursing Services, | Inc., | | \$ | |
| | 3 | | | BOIS BISGAARD & ow Blvd., Suite 600 | e SMITH | | |
| | 4 | | Las Vegas, NV 89 | 118 | | • • | |
| | 5 | The a | bove described with | nesses are expected l circumstances surr | to be identified | during discov armer and the | ery and to incident in |
| | 6 | questions inc | luding but not limi | ted to investigations | s performed, back | ground checks | performed |
| | 7 | regarding Ste | ven Farmer and the | assignment of Steve | n Farmer to Cente | ennial Hills Hos | pital. |
| | 8 | 9. | Crystal Johnson 4650 North Rainb | ow Blvd., #2109 | | | |
| | 9 | | Las Vegas, NV 89 | | | | |
| 7.) KS | 10 | | 714-580-5383 | | | | |
| LD, LLC ve 702-384-6025 | 11 | Ms. J matter THIS | ohnson is expected | to testify as to the EPRESENTED BY | e facts and circur COUNSEL. | nstances surrou | unding this |
| | 12 | | | · · · · | | | |
| AOONVELD, LL ENTER DRIVE 20 ADA 89144 RACSIMILE: 702-384-6 | 13 | 10. | Douglas Nichols c/o John F. Bemis | , Esq. | ÷ | | |
| EVADA | 14 | | HALL PRANGLI | & SCHOONVELD Center Drive, Suite | | | |
| E & Burn Surn EGAS, N | 15 | | Las Vegas, NV 89 | | 200 | | |
| PRANGLE & 1160 North To Su Las Vegas, te: 702-889-6400 | 16 | Mr. N | lichols is expected | to testify as to the | e facts and circur | nstances surrou | unding this |
| | 17 | matter. | · · | • • | | · • | |
| HALL] | 18 | 11. | Mary Jo Solon | | · . | L | |
| | 19 | | Southwest Medica | al Associates | | • | |
| | 20 | Ms. S | olon is expected to | testify as to the facts | and circumstance | s surrounding t | his matter. |
| | 21 | 12. | Matthew Ross | | | . * * | |
| | 22 | | Rawson-Neal Psy 1650 Community | | | | |
| | 23 | | Las Vegas, NV 89 | | • | 11 | |
| | 24 | Mr. R | oss is expected to te | estify as to the facts a | and circumstances | surrounding th | is matter. |
| | 25 | | Michelle Simmon | | | | |
| | 26 | 13. | 5336 Fireside Rar | ich Ave. | | | |
| • . .• · | 27 | | Las Vegas, NV 89 | 9131 | | | |
|) Y | 28 | | ۰. | | | | |
| | | | | | | | |
| | | | | | | | |

AA2330

Ms. Simmons is expected to testify as to the facts and circumstances surrounding this 1 matter. 2 14. Salvatore Sparacino 3 c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 4 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 5 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this 6 matter. 7 15. Nida Ibasco Canque, RN 8 7940 Quail Breast Lane 9 Las Vegas, NV 89131 (This is last known address) 10 702-384-6025 Nurse Canque was a night-shift nurse during the time period of February through 11 June 2008, and therefore, may have knowledge and information about the facts and 12 circumstances surrounding this matter. FACSIMILE: 13 Asuncion Layug, RN 16. 8920 Rendon Street 14 Las Vegas, NV 89143 **TELEPRONE: 702-889-6400** 15 (This is last known address) 16 Nurse Layug was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and 17 circumstances surrounding this matter. 18 Alxenia Priscilla Brown-Gay, RN 17. 19 5973 Spinnaker Point Avenue Las Vegas, NV 89110 20 (This is last known address) 21 Nurse Brown-Gay was a night-shift nurse during the time period of February 22 through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 23 24 Ì11 25 /// 26 III27 111 28 Page 5 of 14

AA2331

HALL PRANGLE & AOONVELD, LL(1160 North Town Center Drive 89144 LAS VEGAS, NEVADA

18. Emma Birrey Cortez, RN **1835 Pallid Swift Court** North Las Vegas, NV 89084 (This is last known address)

Nurse Cortez was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

1.26

19. Maria Asuncion Katri E. Dakudao, RN 5201 Meadows Lily Avenue Las Vegas, NV 89108 (This is last known address)

Jenette Luoang Banas, RN

John F. Bemis, Esq.

c/o Michael E. Prange, Esq., and

Nurse Dakudao was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

HALL PRANGLE & AOONVELD, LLC 1160 North Town Center Drive 702-384-602 FACSIMILE: 89144 702-889-6400 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

23

TELEPHONE:

20.

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 Nurse Banas was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and

circumstances surrounding this matter.

Tiffiney Diane Bills, CNA 21. 4230 Valley Regents Drive North Las Vegas, NV 89032 (This is last known address)

Ms. Bills was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and 22 circumstances surrounding this matter.

| 24 | 22. | Deepa Abraham, LPN 4515 N. Las Vegas Blvd., Bldg. 78, #1003 |
|----|-----|--|
| 25 | | Las Vegas, NV 89115 (This is last known address) |
| 26 | | |

Ms. Abraham was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and 27 circumstances surrounding this matter. s. 28

Page 6 of 14

23. Cindy L. Parmelee 4516 Mohawk River Avenue North Las Vegas, NV 89031 (This is last known address)

ľ

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FACSIMILE: 702-384-6025

LAS VEGAS, NEVADA 89144 702-889-6400 FACSIMILE:

TELEPHONE:

HOONVELD, LLC

1160 NORTH TOWN CENTER DRIVI

HALL PRANGLE &

Ms. Parmelee was a night-shift RN during the time period cf February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

i) N

24. Marie Bayrotie Pierre, RN 8914 Bonneville Peak Court Las Vegas, NV 89148 (*This is last known address*)

Nurse Pierre was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

25. Ana Maria P. Salcedo, RN 3832 Kettle Falls Avenue North Las Vegas, NV 89085 (This is last known address)

Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2003, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

26. Charlene Walker-Lexing, 3829 Moonshine Falls Avenue North Las Vegas, NV 89085 (This is last known address)

Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

| 27. | Virginia D. De Chavez |
|-----|------------------------------|
| | 12338 Holly Jane Court |
| | Orlando, FL 32824 |
| | (This is last known address) |

De Chavez was an RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Page 7 of 14

Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle 28. 1 3937 Sierra Sun Street North Las Vegas, NV 89032 2 (This is last known address) 3 On information and belief, Ms. Hutchinson was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and 4 information about the facts and circumstances surrounding this matter. 5 6 Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN 29. 7 **224 Algiers Drive** Venice, FL 34293 8 (This is last known address) 9 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge 10 702-384-6025 and information about the facts and circumstances surrounding this matter. 11 12 30. Paula L. Mosley, RN FACSIMILE: **5880 Boulder Falls Street** 13 Henderson, NV 89011 (This is last known address) 14 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) LAS VEGAS, 15 TELEPHONE: 702-889-6400 during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 16 17 Amy Dee Schuele, RN 31. 18 **5277 Drifting Sands Court** Las Vegas, NV 89149 19 (This is last known address) 20 Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge 21 and information about the facts and circumstances surrounding this matter. 22 Victoria Stringer, RN 23 32. 2208 Frostproof Street 24 Las Vegas, NV 89128 (This is last known address) 25 Nurse Stringer was a RN who sometimes worked double shifts (from day to night) 26 during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 27 38 28 Page 8 of 14

HOONVELD, LLC

891

HALL PRANGLE & HOONVEL 1160 North Town Center Drive

AA2334

33. Lorraine F. Wescott, RN 8888 Sparkling Creek Avenue Las Vegas, NV 89143 (This is last known address)

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

702-384-602

FACSIMILE: 89144

NEVADA

LAS VEGAS,

FELEPHONE: 702-889-6400

HALL PRANGLE & AOONVELD, LLC 1160 North Town Center Drive

Nurse Wescott was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

34. Ma Ramona Ticao Albunan 10 Forest Grove Drive, #21 Daly City, CA 94015 (This is last known address)

Nurse Albunan was a RN who sometimes worked as the evening Nurse Clinical Supervisor during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

35. Vickie A. Johnson, RN 9129 Amber Waves Street Las Vegas, NV 89123 (This is last known address)

Nurse Johnson was a former Director of Nursing during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 17

36. Lilibeth Parejas, RN

Bernadine Rebogio, RN 37.

38. Janice Collado, RN

- Darlene Infante Carbonell, RN 39.
- Maria Dacquell, CNA 40.

41. Rhona Lopez

Aman McPherson 42.

43. Ailynne Belbis

Larena Abdul 44. 45. Rebecca Cronister c/o. John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144

The above-named individuals, Parejas - Cronister (#36-45), are current employees of Defendant, Valley Health System, LLC, and have been identified by Defendant as having 27 worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor 28

in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testify. 1 ·2 **Carol Butler** 46. 9079 William Cody Dr. . 3 Evergreen, CO 80439 4 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time 5 of the events surrounding the instant litigation. 6 Amy Blasing, formerly Amy Bochenek 47. 7 9521 San Mateo Blvd. NE Albuquerque, NM 87113 8 Ms. Blasing is the former director of the Emergency Department at the time of the 9 events surrounding the instant litigation. 10 FACSIMILE: 702-384-6025 48. **Darby Curly** 11 4021 Cherokee Rose Ave 12 N Las Vegas, NV 89031 · i! . . LAS VECAS, NEVADA 89144 Telephone: 702-889-6400 Facsimile: Mr. Curly is a former charge nurse in the Emergency Department at the time of the 13 events surrounding the instant litigation. 14 . . Defendant reserves the right to supplement its list of witnesses. 15 49. Defendant reserves the right to call any witnesses identified by any other parties 16 50. in this litigation. 17 18 II. 19 **DOCUMENTS** 20 Jane Doe's medical records Bates Stamped CH00001 through CH00317 1. 21 (Exhibit A on CD). 22 Centennial Hills Hospital Daily Security Logs 2. Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD). 23 Records produced by Nevada State Board of Nursing 24 3. (Exhibit C on CD). R. 25 Centennial Hills Hospital Job Description for CNA 26 4. Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD). 27 28

HALL PRANGLE & HOONVELD, LLC

160 NORTH TOWN CENTER DRIVI

Page 10 of 14

| . PRANGLE & AOONVELD, LLC | N CENTER DRIVE | :200 | EVADA 89144 | DNE: 702-889-6400 FACSIMILE: 702-384-6025 | • |
|---------------------------|------------------------------|-----------|-------------------------|---|---|
| PRANGLE & | 1160 NORTH TOWN CENTER DRIVE | SUITE 200 | LAS VECAS, NEVADA 89144 | DNE: 702-889-6400 | |

///

28

LELEPHO

1

2

3

4

5

Daily Patient Assignment Sheets for the 6th Floor dated 05/13/2008 -5. 05/18/2008. Bates Numbered ASSIGN000001-000012 (Exhibit E) Critical Care Services Assignment Sheets for the 5th Floor dated 05/13/2008 -6. 05/18/2008. Bates Numbered ASSIGN000013-000023 (Exhibit F) Emergency Department Daily Assignments dated 05/13/2003 - 05/18/2008. 7. Bates Numbered ASSGIN000024 - 000035 (Exhibit G) Steven Dale Farmer Staffing Sheets. 8. Bates Numbered STAFF000001 - 000003 (Exhibit H) 9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 - 000050 (Exhibit I) Privilege Log for Schedule of Steven Dale Farmer 10. (Exhibit J) Schedule of Steven Dale Farmer at Centennial Hills Hospital from 11. April 13, 2008 through June 7, 2008 bates labeled CHH00318 - CHH00321 (Exhibit K) Privilege Log for Schedule of Steven Dale Farmer 12. (Exhibit L) Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 13. bates labeled CHH00322 - CHH00325 (Exhibit M) Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer 14. (Exhibit N) Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled 15. CHH00326 - CHH00365 (Exhibit O) Privilege Log for Agency Payroll Spreadsheets for February 2008, 16. March 2008, April 2008 and May 2008 (Exhibit P)

 \mathcal{A}

702-384-6025 MOONVELD, LLC HALL PRANGLE & HOONVEI 1160 North Town Center Driv FACSIMILE: 89144 702-889-6400 **FELEPHONE:**

1

2

3

4

5

6

7

8

9

10

- 26

Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, 17. and May 2008 bates labeled CHH00366 - CHH00372 ġ. (Exhibit Q)

- Medical Records from Clark County Adult Mental Health bates labeled 18. CCAMH00001 - CCAMH00022 (Exhibit R attached hereto via CD)
- Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 -19. Chop00038 (Exhibit S attached hereto via CD)
- Medical Records from MountainView Hospital bates labeled MVH00001 -20. MVH00159 (Exhibit T attached hereto via CD)
- Medical Records from Southern Hills Hospital bates labeled Shills00001 -21. Shills00241 (Exhibit U attached hereto via CD)
- Medical Records from University Medical Center bates labeled UMC00001 -22. UMC00209 (Exhibit V attached hereto via CD)
- Las Vegas Metropolitan Police Department's Criminal File of Steven Dale 23. Farmer bates labeled LVMPD00001 - LVMPD0190 with Privilege Log. (Exhibit W attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
- Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer 24. bates labeled LVMPD0191 - LVMPD0196. (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
- Las Vegas Metropolitan Police Department's Audio File of 911 Call 25. (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
- Policy and Procedure Domestic Violence (or Spousal Abuse) 26. (Exhibit Z attached hereto bates labeled P&P0001 - 0005)
- Policy and Procedure Abuse/Neglect of Neonates/Children 27. (Exhibit AA attached hereto bates labeled P&P0006 - 0010)
- Policy and Procedure Abuse/Neglect of the Elderly 28. (Exhibit BB attached hereto bates labeled P&P0011 - 0013)
- Privilege Log regarding Patient Safety Committee Minutes and 29. Documentation from June, July, August and September of 2008. (Exhibit **CC)**.

Ì.

| | 1 | 30. Defendant reserves the right to supplement this list of documents. |
|--|----------|--|
| | 2 | 31. Defendant reserves the right to utilize any document utilized or identified by any |
| | 3 | other party to this litigation. |
| | 4 | DATED this 16 th day of June, 2015. |
| | 5 | |
| | 6 | HALL PRANGLE & SCHOONVELD, LLC |
| | 7 | By: /s/: John Bemis |
| | 8 | MICHAEL E. PRANGLE, ESQ. |
| | 9 | Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. |
| ស ន | 10 | Nevada Bar No. 9509 1160 North Town Center Drive, Suite 200 |
| LD, LLC /E 702-384-6025 | 11 | Las Vegas, NV 89144 Attorneys for Defendant |
| /ELD RIVE 4 E: 702- | | Valley Health System, LLC d/b/a |
| RANGLE & CARONVELD, LLC 1160 North Town Center Drive Sutte 200 LAS VEGAS, NEVADA 89144 : 702-889-6400 FACSIMILE: 702-384-602 | 13 | Centennial Hills Hospital Medical Center |
| E 200 | 14 | |
| LE & | 15 | |
| HALL PRANGLE & 1160 North Tow Suf Las Vegas, felephone: 702-899-6400 | 16 | |
| L PR 11 III | 17 | |
| HALL PR 11 Telephone: | 18 | |
| · | 19 | |
| | 20 | |
| | 21 22 | |
| | 22 | |
| , | 23 | |
| · · · · · · · · · · · · · · · · · · · | 25 | · · · · · · · · · · · · · · · · · · · |
| | 26 | |
| | 27 | |
| х, `/' | 28 | |
|) · | | |
| | | |
| | | Page 13 of 14 |

:

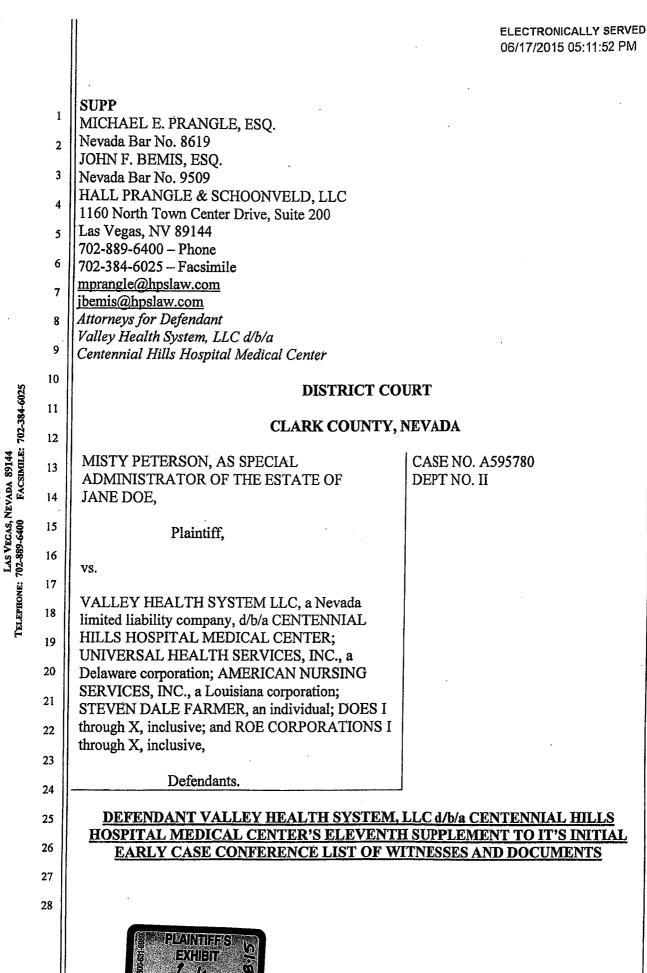
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 16th day of June, 2015, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S TENTH SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on 7 Wiznet pursuant to mandatory NEFCR 4(b) to the following parties: 8 9 Robert E. Murdock, Esq. Eckley M. Keach, Esq. MURDOCK & ASSOCIATES, CHTD. ECKLEY M. KEACH, CHTD. 10 520 South Fourth Street 520 South Fourth Street 11 Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 Attorneys for Plaintiff Attorneys for Plaintiff 12 S. Brent Vogel, Esq. Robert C. McBride, Esq. 13 LEWIS BRISBOIS BISGAARD & SMITH CARROL, KELLY, TROTTER, 6385 South Rainbow Blvd., Suite 600 14 FRANZEN, MCKENNÀ & PEABODY Las Vegas, NV 89118 8329 W. Sunset Road, Suite 260 15 -and-Las Vegas, NV 89113 James P.C. Silvestri, Esq. Attorneys for Defendant, 16 PYATT SILVESTRI Steven Dale Farmer Attorneys for 17 701 Bridger Ave., Suite 600 Defendant Las Vegas, NV 89101 Steven Dale Farmer 18 Attorneys for Defendant American Nursing Services, Inc. 19 20 in atom-Peak 21 An employee of HALL PRANGLE & SCHCONVELD, LLC 22 4841-6653-5205, v. 1 23 24 25 26 • 27 28

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 felephone: 702-889-6400 Facemile: 702-384-6025 1

Page 14 of 14

TAB 49



Page 1 of 14

HALL PRANGLE & JCHOONVELD, LL 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Elepbone: 702-889-6400 Facsimile: 702-384-60

AA2341

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its Eleventh Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

Jane Doe
 c/o Robert E. Murdock, Esq.
 MURDOCK & ASSOCIATES, CHTD.
 521 South Third Street
 Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

LAS VECAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

Steven Dale Farmer
 c/o Robert C. McBride, Esq.
 CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY
 701 North Green Valley Parkway, Suite 200
 Henderson, Nevada 89074

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

| 24 | 4. | Debra Scott, MSN, RN, FRE Executive Director |
|----|----|--|
| 25 | | Nevada State Board of Nursing |
| 26 | | 5011 Meadowwood Mall Way, Suite 300 Reno, NV 89502-6567 |

Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The

Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 2

| 5. | Michael Egstad, Manager I |
|----|---|
| | Licensing and Certification Program |
| | California Department of Public Health (CDPH) |
| | ATCS - MS 3301 |
| | P.O. Box 997416 |
| | 1615 Capitol Avenue |
| | Sacramento, CA 95899-7416 |

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

б. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

21 The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. 22

| 7. | Curtis E. Bazemore, M.D. |
|----|--------------------------|
| | Cobinder S. Chopra, M.D. |
| | James E. Mock, M.D. |

The above identified physicians are expected to testify as to the care and treatment 26 rendered as well as the facts and circumstances surrounding this matter.

27 28

1

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

23

24

25

/ada 89144 Facsimile: 702-384-6025

LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 FACS

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

| HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Sutte 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facismile: 702-384-6025 | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., o'o LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. Crystal Johnson 4650 North Rainbow Blvd., #2109 Las Vegas, NV 89108 714-580-5383 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. Douglas Nichols c/o John F. Bernis, Esq. HALL PRANCLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this matter. Mary Jo Solon Southwest Medical Associates Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. Matthew Ross Ravoon-Neal Psychiatric Hospital 1650 Community College Dr. Las Vegas, NV 89146 Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. Mitchele Simmons 5336 Fireside Ranch Ave. Las Vegas, NV 89131 |
|---|---|--|
| | | Page 4 of 14 |

| | 1 | Ms. Simmons is expected to testify as to the facts and circumstances surrounding this matter. |
|--|----------------------|--|
| | 2 3 4 5 | 14. Salvatore Sparacino c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| | 6 7 | Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this matter. |
| · | 8 9 10 | 15. Nida Ibasco Canque, RN 7940 Quail Breast Lane Las Vegas, NV 89131 (This is last known address) |
| CHOONVELD, LLC CENTER DRIVE CENTER DRIVE 200 VADA 89144 FACSIMILE: 702-384-6025 | 11 12 | Nurse Canque was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| MAN NEV | 13 14 15 | 16. Asuncion Layug, RN 8920 Rendon Street Las Vegas, NV 89143 (This is last known address) |
| HALL PRANGLE & 1160 north To Su Las Vecas, Ielephone: 702-889-6400 | 16 17 18 | Nurse Layug was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| HA | 19 20 | 17. Alxenia Priscilla Brown-Gay, RN 5973 Spinnaker Point Avenue Las Vegas, NV 89110 (This is last known address) |
| | 21 22 23 24 | Nurse Brown-Gay was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| | 24 25 26 | |
| | 27 28 | |
| | | Page 5 of 14 |

AA2345

18. Emma Birrey Cortez, RN 1835 Pallid Swift Court North Las Vegas, NV 89084 (This is last known address) Nurse Cortez was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 19. Maria Asuncion Katri E. Dakudao, RN 5201 Meadows Lily Avenue Las Vegas, NV 89108 (This is last known address) Nurse Dakudao was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 20. Jenette Luoang Banas, RN c/o Michael E. Prange, Esq., and John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 Nurse Banas was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 21. Tiffiney Diane Bills, CNA 4230 Valley Regents Drive North Las Vegas, NV 89032 (This is last known address) Ms. Bills was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 22. Deepa Abraham, LPN 4515 N. Las Vegas Blvd., Bldg. 78, #1003 Las Vegas, NV 89115 (This is last known address) Ms. Abraham was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 LAS VECAS, NEVADA 89144 Telephone: 702-889-6400 FACSIMILE: 702-384-6025 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Page 6 of 14

23. Cindy L. Parmelee 4516 Mohawk River Avenue North Las Vegas, NV 89031 (This is last known address)

Ms. Parmelee was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

24. Marie Bayrotie Pierre, RN 8914 Bonneville Peak Court Las Vegas, NV 89148 (This is last known address)

Nurse Pierre was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

25. Ana Maria P. Salcedo, RN 3832 Kettle Falls Avenue North Las Vegas, NV 89085 (*This is last known address*)

Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

26. Charlene Walker-Lexing, 3829 Moonshine Falls Avenue North Las Vegas, NV 89085 (This is last known address)

Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

27. Virginia D. De Chavez
12338 Holly Jane Court
Orlando, FL 32824
(This is last known address)

De Chavez was an RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle 28. 1 3937 Sierra Sun Street North Las Vegas, NV 89032 2 (This is last known address) 3 On information and belief, Ms. Hutchinson was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the 4 facts and circumstances surrounding this matter. 5 6 Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN 29. 7 224 Algiers Drive Venice, FL 34293 8 (This is last known address) 9 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during 10 the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 11 12 Paula L. Mosley, RN 30. 5880 Boulder Falls Street 13 Henderson, NV 89011 (This is last known address) 14 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during 15 the time period of February through June 2008, and therefore, may have knowledge and 16 information about the facts and circumstances surrounding this matter. 17 Amy Dee Schuele, RN 31. 18 5277 Drifting Sands Court Las Vegas, NV 89149 19 (This is last known address) 20 Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and 21 information about the facts and circumstances surrounding this matter. 22 Victoria Stringer, RN 23 32. 2208 Frostproof Street 24 Las Vegas, NV 89128 (This is last known address) 25 Nurse Stringer was a RN who sometimes worked double shifts (from day to night) during 26 the time period of February through June 2008, and therefore, may have knowledge and 27 information about the facts and circumstances surrounding this matter. 28

702-384-6025

ADA 89144 FACSIMILE:

LAS VEGAS, NEVADA

702-889-6400

FELEPHONE:

HALL PRANGLE & wedoonveld, LLC

1160 NORTH TOWN CENTER DRIVI

SUITE 200

Page 8 of 14

33. Lorraine F. Wescott, RN
 8888 Sparkling Creek Avenue
 Las Vegas, NV 89143
 (This is last known address)

Nurse Wescott was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

34. Ma Ramona Ticao Albunan
10 Forest Grove Drive, #21
Daly City, CA 94015
(This is last known address)

Nurse Albunan was a RN who sometimes worked as the evening Nurse Clinical Supervisor during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Vickie A. Johnson, RN
 9129 Amber Waves Street
 Las Vegas, NV 89123
 (This is last known address)

Nurse Johnson was a former Director of Nursing during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

36. Lilibeth Parejas, RN

37. Bernadine Rebogio, RN

38. Janice Collado, RN

39. Darlene Infante Carbonell, RN

40. Maria Dacquell, CNA

41. Rhona Lopez

42. Aman McPherson

43. Ailynne Belbis

44. Larena Abdul

45. Rebecca Cronister

- c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC
 - 1160 North Town Center Drive, Suite 200
- Las Vegas, NV 89144

The above-named individuals, Parejas – Cronister (#36-45), are current employees of
 Defendant, Valley Health System, LLC, and have been identified by Defendant as having
 worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor

28

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testify. 1 2 46. Carol Butler 3 9079 William Cody Dr. Evergreen, CO 80439 4 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the 5 events surrounding the instant litigation. 6 Amy Blasing, formerly Amy Bochenek 47. 7 9521 San Mateo Blvd. NE Albuquerque, NM 87113 8 Ms. Blasing is the former director of the Emergency Department at the time of the events 9 surrounding the instant litigation. 10 FACSIMILE: 702-384-6025 48. Darby Curly 11 4021 Cherokee Rose Ave 12 N Las Vegas, NV 89031 LAS VECAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 13 Mr. Curly is a former charge nurse in the Emergency Department at the time of the events surrounding the instant litigation. 14 Defendant reserves the right to supplement its list of witnesses. 15 49. 16 Defendant reserves the right to call any witnesses identified by any other parties 50. in this litigation. 17 18 II. 19 DOCUMENTS 20 Jane Doe's medical records Bates Stamped CH00001 through CH00317 1. 21 (Exhibit A on CD). 22 Centennial Hills Hospital Daily Security Logs 2. Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD). 23 24 Records produced by Nevada State Board of Nursing 3. (Exhibit C on CD). 25 Centennial Hills Hospital Job Description for CNA 26 4. Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD). 27 28

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE SUITE 200

Page 10 of 14

| 1 2 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
|----------------|------------|---|
| 3 4 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F) |
| 5 6 7 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G) |
| 8 9 | 8. | Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H) |
| 10 11 | 9. | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| 12 13 14 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J) |
| 14 15 16 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K) |
| 17 18 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) |
| 19 20 | 13. | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 – CHH00325 (Exhibit M) |
| 21 22 | 14. | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N) |
| 23 24 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 – CHH00365 (Exhibit O) |
| 25 26 | 16. | Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P) |
| 27 28 | /// /// | |
| | | |

Ž

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

, 1234,

| 1 2 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372 (Exhibit Q) |
|----------|-----|--|
| 3 | 18. | Medical Records from Clark County Adult Mental Health bates labeled |
| 4 | | CCAMH00001 - CCAMH00022 (Exhibit R attached hereto via CD) |
| 5 | 19. | Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 – Chop00038 (Exhibit S attached hereto via CD) |
| 6 7 | 20. | Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD) |
| 8 9 | 21. | Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD) |
| 10 11 | 22. | Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD) |
| 12 | 23. | Las Vegas Metropolitan Police Department's Criminal File of Steven Dale |
| 13 | | Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. (Exhibit W attached hereto via CD) |
| 14 | | CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 15 16 | 24. | Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. |
| 17 | | (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 18 | 25. | Las Vegas Metropolitan Police Department's Audio File of 911 Call |
| 19 | | (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 20 | 26. | Policy and Procedure – Domestic Violence (or Spousal Abuse) |
| 21 | | (Exhibit Z attached hereto bates labeled P&P0001 - 0005) |
| 22 23 | 27. | Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010) |
| 24 | | Policy and Procedure – Abuse/Neglect of the Elderly |
| 25 | 28. | (Exhibit BB attached hereto bates labeled P&P0011 – 0013) |
| 26 | 29. | Privilege Log regarding Patient Safety Committee Minutes and Documentation |
| 27 | | from June, July, August and September of 2008. (Exhibit CC) |
| 28 | 111 | |
| 1 | | |
| | | Page 12 of 14 |
| | | - |

Ser.

-

| | 1 | 30. | Centennial Hills Hospital Managerial Hierarchy Chart | |
|---------------------------|----------|----------------|---|--|
| | 2 | | (Exhibit DD attached hereto and bates labeled CHH00373) | |
| | 3 | 31. | Job Description – RN I (Exhibit EE attached hereto and bates labeled CHH00374 – 00380) | |
| | 4 | 32. | Job Description – RN III | |
| | 5 | | (Exhibit FF attached hereto and bates labeled CHH00381 - 00387) | |
| | 6 7 | 33. | Job Description – Unit Coordinator/ED Tech (Exhibit GG attached hereto and bates labeled CHH00388 – 00395) | |
| | 8 | 34. | Defendant reserves the right to supplement this list of documents. | |
| | 9 | 35. | Defendant reserves the right to utilize any document utilized or identified by any | |
| 5025 . | 10 | other party to | this litigation. | |
| FACSIMILE: 702-384-6025 | 11 | DATE | D this 17 th day of June, 2015. | |
| | 12 | | HALL PRANGLE & SCHOONVELD, LLC | |
| | 13 | | | |
| TELEPHONE: 702-889-6400 F | 14 15 | | By: <u>/s/: John Bemis</u> | |
| | 16 | | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 | |
| E: 702- | 17 | | JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 | |
| EP HON | 18 | | 1160 North Town Center Drive, Suite 200 | |
| Teu | 19 | | Las Vegas, NV 89144 Attorneys for Defendant | |
| | 20 | | Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center | |
| | 21 | | | |
| | 22 | | | |
| | 23 | | | |
| | 24 | | | |
| | 25 | | | |
| | 26 | | | |
| | 27 | | | |
| | 28 | | | |
| | | | | |
| | | | | |
| | | | Page 13 of 14 | |
| | | l | · · · | |

HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 The ferding 2005, Nevada 20144

.

1.

 $\left(\right)$

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 17th day of June, 2015, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S ELEVENTH SUPPLEMENT TO IT'S INITIAL 6 EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service 7 on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties: 8 9 Eckley M. Keach, Esq. Robert E. Murdock, Esq. ECKLEY M. KEACH, CHTD. MURDOCK & ASSOCIATES, CHTD. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiff Attorneys for Plaintiff 12 Robert C. McBride, Esq. S. Brent Vogel, Esq. 13 CARROL, KELLY, TROTTER, LEWIS BRISBOIS BISGAARD & SMITH FRANZEN, MCKENNA & PEABODY 6385 South Rainbow Blvd., Suite 600 14 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89118 15 Las Vegas, NV 89113 -and-Attorneys for Defendant James P.C. Silvestri, Esq. 16 Steven Dale Farmer Attorneys for PYATT SILVESTRI 701 Bridger Ave., Suite 600 Defendant 17 Steven Dale Farmer Las Vegas, NV 89101 18 Attorneys for Defendant American Nursing Services, Inc. 19 20 21 An employee of HALL PRANGLE & SCHOONVELD, LLC 22 4847-7549-8533, v. 1 23 24 25 26 27 28

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 FacSimile: 702-384-6025 1

Page 14 of 14

TAB 50

| | 1 | | | | | |
|-------------------------|----|---|---|--|--|--|
| | | | | | | |
| | 1 | SUPP MICHAEL E PRANCIE ESO | · . | | | |
| | 2 | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 | ELECTRONICALLY SERVED 07/10/2015 04:26:09 PM | | | |
| | | JOHN F. BEMIS, ESQ. | 07710/2015 04.20.09 PW | | | |
| | 3 | Nevada Bar No. 9509 HALL PRANGLE & SCHOONVELD, LLC | | | | |
| | 4 | 1160 North Town Center Drive, Suite 200 | | | | |
| | 5 | Las Vegas, NV 89144 702-889-6400 – Phone | | | | |
| | 6 | 702-384-6025 – Facsimile | | | | |
| | 7 | mprangle@hpslaw.com jbemis@hpslaw.com | | | | |
| | 8 | Attorneys for Defendant | | | | |
| | 9 | Valley Health System, LLC d/b/a | | | | |
| | 10 | | | | | |
| FACSIMILE: 702-384-6025 | | DISTRICT COU | JRT | | | |
| | 11 | CLARK COUNTY, N | NEVADA | | | |
| | 12 | MISTY PETERSON, AS SPECIAL | CASE NO. A595780 | | | |
| CSIMU | 13 | ADMINISTRATOR OF THE ESTATE OF | DEPT NO. II | | | |
| FAC | 14 | JANE DOE, | | | | |
| 406 | 15 | Plaintiff, | | | | |
| HONE: 702-889-6400 | 16 | | | | | |
| 20 30 | 17 | VS. | | | | |
| <u>-</u> | 18 | VALLEY HEALTH SYSTEM LLC, a Nevada | | | | |
| I ELE | 19 | limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; | | | | |
| | | UNIVERSAL HEALTH SERVICES, INC., a | | | | |
| | 20 | Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; | | | | |
| | 21 | STEVEN DALE FARMER, an individual; DOES I | | | | |
| | 22 | through X, inclusive; and ROE CORPORATIONS I through X, inclusive, | | | | |
| | 23 | | | | | |
| | 24 | Defendants. | | | | |
| | 25 | DEFENDANT VALLEY HEALTH SYSTEM, | LLC d/b/a CENTENNIAL HILLS | | | |
| | 26 | HOSPITAL MEDICAL CENTER'S TWELFTH | SUPPLEMENT TO IT'S INITIAL | | | |
| | [| EARLY CASE CONFERENCE LIST OF W | LINEOSED AND DOCUMENTS | | | |
| | 27 | | | | | |
| | 28 | | | | | |
| | | PLAINTIFE'S EXHIBIT 12 2 /. 99 A 595780 0 Page 1 of 15 | | | | |

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Telephone: 702-889-6400

Ĩ

*** { }

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its Twelfth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

Jane Doe

 c/o Robert E. Murdock, Esq.
 MURDOCK & ASSOCIATES, CHTD.
 521 South Third Street
 Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

Steven Dale Farmer
 c/o Robert C. McBride, Esq.
 CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY
 701 North Green Valley Parkway, Suite 200
 Henderson, Nevada 89074

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

| 23 | |
|----|--|
| 24 | Debra Scott, MSN, RN, FRE Executive Director |
| 25 | Nevada State Board of Nursing 5011 Meadowwood Mall Way, Suite 300 |
| 26 | Reno, NV 89502-6567 |

Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

| 1 2 | Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). |
|---------------------------------------|--|
| 3 4 5 6 7 8 9 10 | 5. Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number |
| 11 | 00199703, Nurse Assistant Certificate 00659300). |
| 12 | 6. Collado Jeunnesse, RN |
| 13 | Kim Moon, RN Abraham Deppa, CNA |
| 14 | Nikki Carter, CNA Marina McDowell, CNA |
| 15 | Alana Schons, CNA Nelina Arante, RN |
| 16 | Ronald Lodevico |
| 17 | Venise Abelard, CNA Paula Mosley, RN |
| 18 | Pamela Flagg, CNA Amber Vergara |
| 19 | Loretta Korinis Michelle Lucas |
| 20 | |
| 21 22 | The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. |
| 23 | 7. Curtis E. Bazemore, M.D. |
| 24 | Cobinder S. Chopra, M.D. James E. Mock, M.D. |
| 25 | |
| 26 | The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. |
| 27 | |
| 28 | |
| | |

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsmille: 702-384-6025

- 1

AA2358

| | 1 2 3 4 5 6 7 8 | Ms. Simmons is expected to testify as to the facts and circumstances surrounding this matter. 14. Salvatore Sparacino c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this matter. 15. Nida Ibasco Canque, RN |
|---|--------------------------------------|--|
| | 9 | 7940 Quail Breast Lane Las Vegas, NV 89131 |
| 7. VQ | 10 | (This is last known address) |
| LLC 84-602 | 11 | Nurse Canque was a night-shift nurse during the time period of February through June |
| HOONVELD, LLC CENTER DRIVE 00 FACSIMILE: 702-384-6025 | 12 | 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| ONVI TER DRI 89144 SIMILE: | 13 | 16. Asuncion Layug, RN |
| N CEN N CEN 200 FAC | 14 | 8920 Rendon Street |
| RANGLE & SCHOONVEL 1160 North Town Center Drive Sutte 200 Las Vegas, Nevada 89144 :: 702-889-6400 Facsimile: 70 | 15 | Las Vegas, NV 89143 (This is last known address) |
| NGL) NORT LAS VE 12-889- | 16 | Nurse Layug was a night-shift nurse during the time period of February through June |
| HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsmile: 702-384-602 | 17 | 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| HAI | 18 | 17. Alxenia Priscilla Brown-Gay, RN |
| . • | 19 | 5973 Spinnaker Point Avenue |
| | 20 | Las Vegas, NV 89110 (This is last known address) |
| | 21 | |
| | 22 23 | Nurse Brown-Gay was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| | 24 | |
| | 25 | /// |
| | 26 | /// |
| | 27 | /// |
| | 28 | /// |
| | | |

18. Emma Birrey Cortez, RN 1 1835 Pallid Swift Court North Las Vegas, NV 89084 2 (This is last known address) 3 Nurse Cortez was a night-shift nurse during the time period of February through June 4 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 5 6 19. Maria Asuncion Katri E. Dakudao, RN 5201 Meadows Lily Avenue 7 Las Vegas, NV 89108 (This is last known address) 8 9 Nurse Dakudao was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances 10 surrounding this matter. 11 20. Jenette Luoang Banas, RN 12 c/o Michael E. Prangle, Esq., and John F. Bemis, Esq. 13 HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 14 Las Vegas, NV 89144 15 Nurse Banas was a night-shift nurse during the time period of February through June 16 2008, and therefore, may have knowledge and information about the facts and circumstances 17 surrounding this matter. 18 21. Tiffiney Diane Bills, CNA 4230 Valley Regents Drive 19 North Las Vegas, NV 89032 20 (This is last known address) 21 Ms. Bills was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances 22 surrounding this matter. 23 Deepa Abraham, LPN 22. 24 4515 N. Las Vegas Blvd., Bldg. 78, #1003 Las Vegas, NV 89115 25 (This is last known address) 26 Ms. Abraham was a night-shift CNA during the time period of February through June 27 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 28

FACSIMILE: 702-384-6025

LAS VEGAS, NEVADA 89144 Telephone: 702-889-6400 Facsimile:

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE SUITE 200

Page 6 of 15

Cindy L. Parmelee
 4516 Mohawk River Avenue
 North Las Vegas, NV 89031
 (This is last known address)

Ms. Parmelee was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

24. Marie Bayrotie Pierre, RN 8914 Bonneville Peak Court Las Vegas, NV 89148 (This is last known address)

Nurse Pierre was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

25. Ana Maria P. Salcedo, RN
3832 Kettle Falls Avenue
North Las Vegas, NV 89085
(*This is last known address*)

Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

26. Charlene Walker-Lexing,
3829 Moonshine Falls Avenue
North Las Vegas, NV 89085
(This is last known address)

Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

| 27. | Virginia D. De Chavez |
|-----|------------------------------|
| | 12338 Holly Jane Court |
| | Orlando, FL 32824 |
| | (This is last known address) |

De Chavez was an RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimme: 702-384-6025 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

| 1 | 28. Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle 3937 Sierra Sun Street North Las Vegas, NV 89032 |
|---------------------|---|
| · 3 | (This is last known address) |
| 4 | On information and belief, Ms. Hutchinson was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the |
| 5 | facts and circumstances surrounding this matter. |
| 6 7 [.] | 29. Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN 224 Algiers Drive Venice, FL 34293 |
| 8 | (This is last known address) |
| 9 10 | Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and |
| 11 | information about the facts and circumstances surrounding this matter. |
| 12 | 30. Paula L. Mosley, RN |
| 13 | 5880 Boulder Falls Street Henderson, NV 89011 |
| 14 | (This is last known address) |
| 15 | Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during |
| 16 | the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| 17 18 | 31. Amy Dee Schuele, RN |
| 19 | 5277 Drifting Sands Court Las Vegas, NV 89149 |
| 20 | (This is last known address) |
| 21 | Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and |
| 22 | information about the facts and circumstances surrounding this matter. |
| 23 | 32. Victoria Stringer, RN |
| 24 | 2208 Frostproof Street Las Vegas, NV 89128 |
| 25 | (This is last known address) |
| 26 | Nurse Stringer was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and |
| 27 | information about the facts and circumstances surrounding this matter. |
| 28 | |
| | Page 8 of 15 |

1

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

33. Lorraine F. Wescott, RN
 8888 Sparkling Creek Avenue
 Las Vegas, NV 89143
 (This is last known address)

Nurse Wescott was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

34. Ma Ramona Ticao Albunan
 10 Forest Grove Drive, #21
 Daly City, CA 94015
 (This is last known address)

Nurse Albunan was a RN who sometimes worked as the evening Nurse Clinical Supervisor during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

35. Vickie A. Johnson, RN
9129 Amber Waves Street
Las Vegas, NV 89123
(This is last known address)

Nurse Johnson was a former Director of Nursing during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

36. Lilibeth Parejas, RN

37. Bernadine Rebogio, RN

38. Janice Collado, RN

39. Darlene Infante Carbonell, RN

40. Maria Dacquell, CNA

41. Rhona Lopez

42. Aman McPherson

43. Ailynne Belbis

44. Larena Abdul

45. Rebecca Cronister

- c/o John F. Bemis, Esq.
 - HALL PRANGLE & SCHOONVELD, LLC
- 1160 North Town Center Drive, Suite 200
 - Las Vegas, NV 89144

The above-named individuals, Parejas – Cronister (#36-45), are current employees of Defendant, Valley Health System, LLC, and have been identified by Defendant as having worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor

28

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

'ADA 89144 Facsimile: 702-384-6025

LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 FACS

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testify. 1 2 46. Carol Butler 3 9079 William Cody Dr. Evergreen, CO 80439 4 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the 5 events surrounding the instant litigation. 6 Amy Blasing, formerly Amy Bochenek 47. 7 9521 San Mateo Blvd. NE Albuquerque, NM 87113 8 Ms. Blasing is the former director of the Emergency Department at the time of the events 9 surrounding the instant litigation. 10 Darby Curly 48. 11 4021 Cherokee Rose Ave 12 N Las Vegas, NV 89031 13 Mr. Curly is a former charge nurse in the Emergency Department at the time of the events surrounding the instant litigation. 14 Defendant reserves the right to supplement its list of witnesses. 15 49. 16 Defendant reserves the right to call any witnesses identified by any other parties 50. in this litigation. 17 18 II. 19 DOCUMENTS 20 Jane Doe's medical records Bates Stamped CH00001 through CH00317 1. 21 (Exhibit A on CD). 22 Centennial Hills Hospital Daily Security Logs 2. Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD). 23 Records produced by Nevada State Board of Nursing 24 3. (Exhibit C on CD). 25 Centennial Hills Hospital Job Description for CNA 26 4. Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD). 27 28

LAS VEGAS, NEVADA 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE SUITE 200

AA2364

| | | | Page 11 of 15 |
|---|----------|-----|--|
| | | | |
| ; ;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;; | 28 | 111 | |
| | 27 | 111 | (Exhibit P) |
| | 26 | 10 | March 2008, April 2008 and May 2008 |
| | 25 | | • |
| | 24 | | CHH00326 – CHH00365 (Exhibit O) |
| | 22 | 1: | |
| | 21 22 | 14 | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N) |
| | 20 | | (Exhibit M) |
| | 19 | 13 | bates labeled CHH00322 – CHH00325 |
| HALL PR 11 Telephone: | 18 | | (Exhibit L) |
| PRANGLE 1160 North Las Veg ne: 702-889-6 | 17 | 12 | |
| CANGLE & SCHO 60 NORTH TOWN CENT SUITE 200 LAS VECAS, NEVADA 702-889-6400 FACS | 15 | 11. | (Exhibit K) |
| CC SC Town C UTTE 20 S, NEVA | 14 | | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 |
| & SCHOONVEL E SCHOONVEL Town Center Drive Sutte 200 AS, Nevada 89144 400 FACSIMILE: 70 | 13 14 | | (Exhibit J) |
| IVELI DRIVE 44 LE: 703 | 12 | 10 | |
| HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suitte 200 Las Vegas, Nevada 89144 Felephone: 702-889-6400 Facsimille: 702-384-6025 | 11 | | Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| | 10 | 9. | Broadlane, Inc. Contract dated 08/12/2007 |
| | 8 9 | 8. | Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H) |
| | 7 | | (Exhibit G) |
| | 6 | 7. | Bates Numbered ASSGIN000024 – 000035 |
| | 5 | | (Exhibit F) |
| | 3 | 6. | 05/18/2008. Bates Numbered ASSIGN000013 - 000023 |
|) 22 - | 1 2 | 5. | 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
| \rightarrow | | | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – |

| 1 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372 (Exhibit Q) |
|----------|-----|--|
| 3 | 18. | Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD) |
| 4 | 19. | Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 - |
| 5 | | Chop00038 (Exhibit S attached hereto via CD) |
| 7 | 20. | Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD) |
| 8 | 21. | Medical Records from Southern Hills Hospital bates labeled Shills00001 - |
| 9 | | Shills00241 (Exhibit U attached hereto via CD) |
| 10 11 | 22. | Medical Records from University Medical Center bates labeled UMC00001 - UMC00209 (Exhibit V attached hereto via CD) |
| 12 | 23. | Las Vegas Metropolitan Police Department's Criminal File of Steven Dale |
| 13 | | Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. (Exhibit W attached hereto via CD) |
| 14 | | CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 15 | 24. | Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. |
| 16 | | (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 17 | | |
| 18 | 25. | Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD) |
| 20 | | CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 21 | 26. | Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005) |
| 22 | 27. | Policy and Procedure – Abuse/Neglect of Neonates/Children |
| 23 | 27. | (Exhibit AA attached hereto bates labeled P&P0006 – 0010) |
| 24 | 28. | Policy and Procedure – Abuse/Neglect of the Elderly |
| 25 | | (Exhibit BB attached hereto bates labeled P&P0011 – 0013) |
| 26 | 29. | Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC) |
| 27 28 | /// | |
| 20 | | |
| | | |

{

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facemile: 702-384-6025

Page 12 of 15

| 1 | 30. | Centennial Hills Hospital Managerial Hierarchy Chart (Exhibit DD attached hereto and bates labeled CHH00373) |
|----------|------|--|
| 2 3 | 31. | Job Description – RN I (Exhibit EE attached hereto and bates labeled CHH00374 – 00380) |
| 4 5 | 32. | Job Description – RN III (Exhibit FF attached hereto and bates labeled CHH00381 – 00387) |
| 6 | 33. | Job Description – Unit Coordinator/ED Tech (Exhibit GG attached hereto and bates labeled CHH00388 – 00395) |
| 8 | 34. | Policy and Procedure – Chain of Command (Exhibit HH attached hereto and bates labeled P&P0014-0017) |
| 9 10 | 35. | Privilege Log Regarding Patient Relations Log from February, March, April and May, 2008 (Exhibit II attached hereto) |
| 11 12 | 36. | Patient Relations Log (Exhibit JJ attached hereto and bates labeled PtRelations0001-0009) |
| 13 14 | 37. | Privilege Log Regarding Risk Events from February, March, April and May, 2008 (Exhibit KK attached hereto) |
| 15 | 38. | Risk Events (Exhibit LL attached hereto and bates labeled RiskEvents0001-0026) |
| 16 17 | 39. | ` Privilege Log Regarding Grievance Log (Exhibit MM attached hereto) |
| 18 19 | 40. | Grievance Log (Exhibit NN attached hereto and bates labeled Grievance0001-0018) |
| 20 | 41. | Bureau of Health Care Quality and Compliance for Centennial Hills Hospital Medical Center (Exhibit OO attached hereto and bates |
| 21 | | Labeled BHCQ0001-0038) |
| 22 23 | | |
| 23 24 | | |
| 25 | ,,,, | |
| 26 | /// | |
| 27 | /// | · · |
| 28 | /// | - · · · · · · · · · · · · · · · · · · · |
| | | |

Page 13 of 15

. 75

| A formation and the second secon | | 1 | 42. Defendant reserves the right to supplement this list of documents. 43. Defendant reserves the right to utilize any document utilized or identified by any |
|--|---|----------|--|
| | | 2 | |
| | | 4 | other party to this litigation. |
| | | 5 | DATED this 10 th day of July, 2015. |
| | | 6 | HALL PRANGLE & SCHOONVELD, LLC |
| | | 7 | By: /s/: John Bemis |
| | | 8 | MICHAEL E. PRANGLE, ESQ. |
| | | 9 | Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. |
| 7.) | S . | 10 | Nevada Bar No. 9509 1160 North Town Center Drive, Suite 200 |
| LLC | 384-602 | 11 | Las Vegas, NV 89144 Attorneys for Defendant |
| TELD, RIVE | 4 E: 702- | 12 | Valley Health System, LLC d/b/a |
| RANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suppe 200 | a 89144 csimile: | 13 | Centennial Hills Hospital Medical Center |
| SCHO WN CEN | SUITE 200 LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025 | 14 | |
| LE & | | 15 | |
| LL PRANGLE 1160 North | | 16 | |
| L PR | HONE: | 17 | |
| HAL | TELEPI | 18 | |
| | · | 19 | |
| | | 20 | |
| | | 21 22 | |
| | | 22 | /// |
| | | 24 | |
| | | 25 | /// |
| | | 26 | |
| | | 27 | |
| ł | | 28 | /// |
|) | | | |
| | | | Page 14 of 15 |

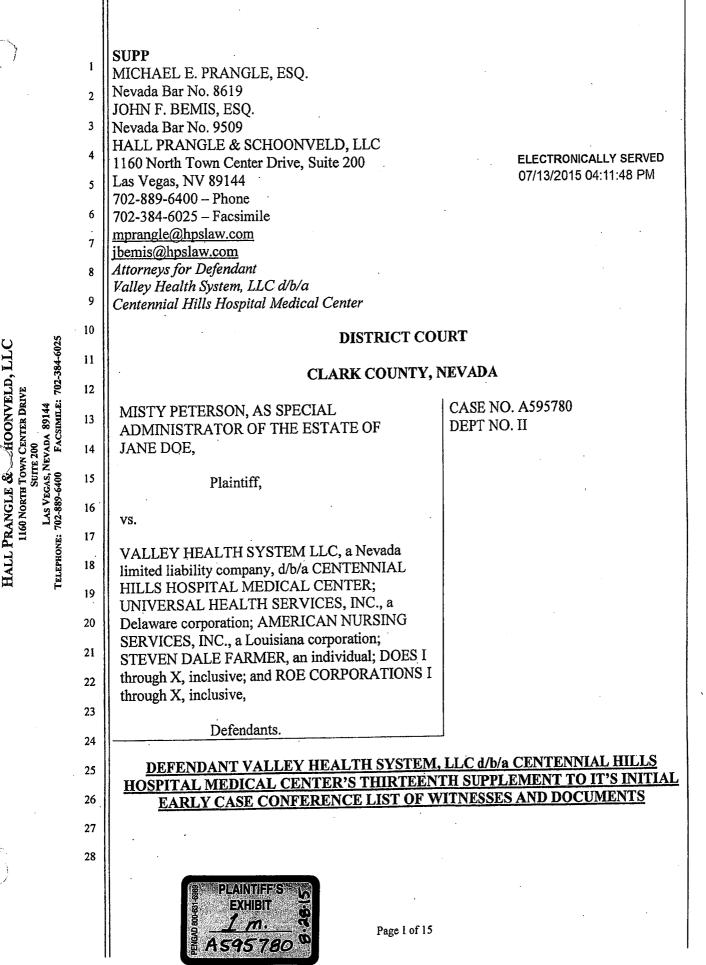
No. of the second secon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 10th day of July, 2015, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S TWELFTH SUPPLEMENT TO IT'S INITIAL 6 EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service 7 on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties: 8 9 Eckley M. Keach, Esq. Robert E. Murdock, Esq. ECKLEY M. KEACH, CHTD. MURDOCK & ASSOCIATES, CHTD. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiff Attorneys for Plaintiff 12 Robert C. McBride, Esq. S. Brent Vogel, Esq. 13 CARROL, KELLY, TROTTER, LEWIS BRISBOIS BISGAARD & SMITH FRANZEN, MCKENNA & PEABODY 6385 South Rainbow Blvd., Suite 600 14 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89118 15 Las Vegas, NV 89113 -and-Attorneys for Defendant James P.C. Silvestri, Esq. 16 Steven Dale Farmer Attorneys for PYATT SILVESTRI Defendant 17 701 Bridger Ave., Suite 600 Steven Dale Farmer Las Vegas, NV 89101 18 Attornevs for Defendant American Nursing Services, Inc. 19 20 /s/: Audrey Ann Stephanski 21 An employee of HALL PRANGLE & SCHOONVELD, LLC 22 4848-8565-1749, v. 1 23 24 25 26 27 28

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

TAB 51



AA2370

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS 1 HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its 2 attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits 3 its Thirteenth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows 4 5 (supplements provided in **bold**): 6

I.

WITNESSES

1. Jane Doe c/o Robert E. Murdock, Esq. MURDOCK & ASSOCIATES, CHTD. 521 South Third Street Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

Jane Doe's two sons 2.

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

3.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

FACSIMILE: 702-384-6025

LAS VEGAS, NEVADA 89144 702-889-6/00 FACSIMILE

TELEPHONE:

HALL PRANGLE & HOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

Steven Dale Farmer c/o Robert C. McBride, Esq. CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY 701 North Green Valley Parkway, Suite 200 Henderson, Nevada 89074

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

23 Debra Scott, MSN, RN, FRE 4. 24 **Executive Director** Nevada State Board of Nursing 25 5011 Meadowwood Mall Way, Suite 300 Reno, NV 89502-6567 26

Ms. Scott is expected to testify regarding The certification process, background check 27 and investigation performed by the Nevada Board of Nursing prior to certification. The 28

Page 2 of 15

Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing 1 prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 2 3 5. Michael Egstad, Manager I Licensing and Certification Program 4 California Department of Public Health (CDPH) ATCS - MS 3301 5 P.O. Box 997416 6 1615 Capitol Avenue Sacramento, CA 95899-7416 7 Mr. Egstad is expected to testify regarding The certification process, background check 8 and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D 9 Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300) 10 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). 11 12 Collado Jeunnesse, RN 6. Kim Moon, RN 13 Abraham Deppa, CNA

Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D.

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

27 28

FACSIMILE: 702-384-6025

14

15

16

17

18

19

20

23

24

25

26

89144

LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 FAC

HALL PRANGLE & CHOONVELD, LLC

[60 NORTH TOWN CENTER DRIV

| \rightarrow | 1 | 8. Employees, former employees, representatives |
|---|-----|--|
| | [] | of and former representatives of American Nursing Services, Inc., |
| | 2 | c/o LEWIS BRISBOIS BISGAARD & SMITH |
| | 3 | 6385 South Rainbow Blvd., Suite 600 |
| . · | 4 | Las Vegas, NV 89118 |
| | 5 | The above described witnesses are expected to be identified during discovery and to |
| | 6 | testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed |
| | 7 | regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| | . 8 | 9. Crystal Johnson 4650 North Rainbow Blvd., #2109 |
| | 9 | Las Vegas, NV 89108 |
| . KO | 10 | 714-580-5383 |
| HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 | 11 | Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. |
| ELD UVE : 702 | 12 | |
| ONVJ ER DR 89144 SIMILE | 13 | 10. Douglas Nichols c/o John F. Bemis, Esq. |
| HOC PENTI MDA 2 FACSI | 14 | HALL PRANGLE & SCHOONVELD, LLC |
| MEV O | | 1160 North Town Center Drive, Suite 200 |
| LE & | 15 | Las Vegas, NV 89144 |
| HALL PRANGLE & HOONVEL 1160 North Town Center Drive Sutte 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 70 | 16 | Mr. Nichols is expected to testify as to the facts and circumstances surrounding this |
| LI 11 ONE: | 17 | matter. |
| (ALI LEPH | 18 | 11. Mary Jo Solon |
| | 19 | Southwest Medical Associates |
| | 20 | Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. |
| | 21 | 12. Matthew Ross |
| | 22 | Rawson-Neal Psychiatric Hospital |
| | | 1650 Community College Dr. |
| | 23 | Las Vegas, NV 89146 |
| | 24 | Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. |
| | 25 | 13. Michelle Simmons |
| | 26 | 5336 Fireside Ranch Ave. |
| | 27 | Las Vegas, NV 89131 |
| | 28 | |
| | | |
| | | Dame 4 of 15 |
| · | | Page 4 of 15 |

C

į.

AA2373

| | , | Ms. Simmons is expected to testify as to the facts and circumstances surrounding this |
|---|----|--|
| | 1 | matter. |
| | 2 | 14. Salvatore Sparacino |
| | 3. | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC |
| | 4 | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| | 5 | |
| | | Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this matter. |
| | 7 | |
| | 8 | 15. Nida Ibasco Canque, RN 7940 Quail Breast Lane |
| | 9 | Las Vegas, NV 89131 |
| 5 6 | 10 | (This is last known address) |
| LLC 384-60: | 11 | Nurse Canque was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances |
| CHOONVELD, LLC CHOONVELD, LLC I Center Drive 1 Center Drive 200 Vada 89144 Vada 89144 Facsmile: 702-384-6025 | 12 | surrounding this matter. |
| CHOONVEL CENTER DRIVE CENTER DRIVE 200 83144 FACSIMILE: 70 | 13 | 16. Asuncion Layug, RN |
| | 14 | 8920 Rendon Street |
| 2 S E Z | 15 | Las Vegas, NV 89143 (This is last known address) |
| RANGLE & Exact 1160 North Town Suite Las Vecas, Ne: 1702-889-6400 | 16 | Nurse Layug was a night-shift nurse during the time period of February through June |
| HALL PRANGLE & 1160 north To Su Las Vecas, Telephone: 702-889-6400 | 17 | 2008, and therefore, may have knowledge and information about the facts and circumstances |
| LLL L | 18 | surrounding this matter. |
| HA | 19 | 17. Alxenia Priscilla Brown-Gay, RN |
| | 20 | 5973 Spinnaker Point Avenue Las Vegas, NV 89110 |
| | 21 | (This is last known address) |
| | 22 | Nurse Brown-Gay was a night-shift nurse during the time period of February through |
| | 23 | June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. |
| | 24 | |
| | 25 | |
| | 26 | /// |
| | 27 | |
| | 28 | /// |
| | | |
| | | |

AA2374

 Emma Birrey Cortez, RN 1835 Pallid Swift Court North Las Vegas, NV 89084 (*This is last known address*)

1.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

702-384-6025

ADA 89144 FACSIMILE:

FELEPHONE: 702-889-6400

LAS VEGAS, NEVADA

HALL PRANGLE & HOONVELD, LL(

1160 NORTH TOWN CENTER DRIV

SUITE 200

Nurse Cortez was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Maria Asuncion Katri E. Dakudao, RN
 5201 Meadows Lily Avenue
 Las Vegas, NV 89108
 (This is last known address)

Nurse Dakudao was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

20. Jenette Luoang Banas, RN
c/o Michael E. Prangle, Esq., and
John F. Bemis, Esq.
HALL PRANGLE & SCHOONVELD, LLC
1160 North Town Center Drive, Suite 200
Las Vegas, NV 89144

Nurse Banas was a night-shift nurse during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

21. Tiffiney Diane Bills, CNA 4230 Valley Regents Drive North Las Vegas, NV 89032 (*This is last known address*)

Ms. Bills was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

22. Deepa Abraham, LPN
4515 N. Las Vegas Blvd., Bldg. 78, #1003
Las Vegas, NV 89115
(This is last known address)

Ms. Abraham was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances 28 surrounding this matter. 23. Cindy L. Parmelee
 4516 Mohawk River Avenue
 North Las Vegas, NV 89031
 (*This is last known address*)

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FACSIMILE: 702-384-6025

Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile:

HALL PRANGLE & CHOONVELD, LLC

1160 NORTH TOWN CENTER DRIV

SUITE 200

Ms. Parmelee was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

24. Marie Bayrotie Pierre, RN 8914 Bonneville Peak Court Las Vegas, NV 89148 (This is last known address)

Nurse Pierre was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

25. Ana Maria P. Salcedo, RN
3832 Kettle Falls Avenue
North Las Vegas, NV 89085
(This is last known address)

Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

26. Charlene Walker-Lexing,
3829 Moonshine Falls Avenue
North Las Vegas, NV 89085
(*This is last known address*)

Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

27. Virginia D. De Chavez 12338 Holly Jane Court Orlando, FL 32824 (This is last known address)

De Chavez was an RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

8 9 10 702-384-6025 HALL PRANGLE & CHOONVELD, LLC 11 12 1160 NORTH TOWN CENTER DRIVE FACSIMILE: 89144 13 LAS VECAS, NEVADA 14 SUITE 200 15 702-889-6400 16

1

2

3

4

5

6

7

17

18

19

20

21

22

23

24

25

26

27

TELEPHONE:

Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle 28. 3937 Sierra Sun Street North Las Vegas, NV 89032 (This is last known address)

On information and belief, Ms. Hutchinson was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN 29. 224 Algiers Drive Venice, FL 34293 (This is last known address)

Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Paula L. Mosley, RN 30. 5880 Boulder Falls Street Henderson, NV 89011 (This is last known address)

Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Amy Dee Schuele, RN 31. 5277 Drifting Sands Court Las Vegas, NV 89149 (This is last known address)

Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Victoria Stringer, RN 32. 2208 Frostproof Street Las Vegas, NV 89128 (This is last known address)

Nurse Stringer was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

33. Lorraine F. Wescott, RN
 8888 Sparkling Creek Avenue
 Las Vegas, NV 89143
 (This is last known address)

Nurse Wescott was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

34. Ma Ramona Ticao Albunan 10 Forest Grove Drive, #21 Daly City, CA 94015 (*This is last known address*)

Nurse Albunan was a RN who sometimes worked as the evening Nurse Clinical Supervisor during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Vickie A. Johnson, RN
 9129 Amber Waves Street
 Las Vegas, NV 89123
 (This is last known address)

Nurse Johnson was a former Director of Nursing during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

36. Lilibeth Parejas, RN

37. Bernadine Rebogio, RN

38. Janice Collado, RN

39. Darlene Infante Carbonell, RN

40. Maria Dacquell, CNA

41. Rhona Lopez

42. Aman McPherson

43. Ailynne Belbis

44. Larena Abdul

45. Rebecca Cronister

- c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC
 - 1160 North Town Center Drive, Suite 200

Las Vegas, NV 89144

The above-named individuals, Parejas – Cronister (#36-45), are current employees of Defendant, Valley Health System, LLC, and have been identified by Defendant as having worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor

28

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

FACSIMILE: 702-384-6025

Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile

HOONVELD, LL

HALL PRANGLE &

1160 NORTH TOWN CENTER DRIVI

in February and/or March of 2008, and may have knowledge and information about the alleged incident with the elderly patient to which Nurse Murray referred in her deposition testify.

46. Carol Butler 9079 William Cody Dr. Evergreen, CO 80439

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FACSIMILE: 702-384-6025

FLEPHONE: 702-889-6400

CHOONVELD, LLC

HALL PRANGLE

1160 NORTH TOWN CENTER DRIVI SUITE 200 Las Vegas, Nevada 89144 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the events surrounding the instant litigation.

47. Amy Blasing, formerly Amy Bochenek9521 San Mateo Blvd. NEAlbuquerque, NM 87113

Ms. Blasing is the former director of the Emergency Department at the time of the events surrounding the instant litigation.

48. Darby Curly
 4021 Cherokee Rose Ave
 N Las Vegas, NV 89031

Mr. Curly is a former charge nurse in the Emergency Department at the time of the events surrounding the instant litigation.

49. Defendant reserves the right to supplement its list of witnesses.

50. Defendant reserves the right to call any witnesses identified by any other parties in this litigation.

II.

DOCUMENTS

- 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD).
- Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD).
- 3. Records produced by Nevada State Board of Nursing (Exhibit C on CD).
- 4. Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD).

Page 10 of 15

| • • | AHOONVELD, LLC | V CENTER DRIVE | 200 | EVADA 89144 | FACSIMILE: 702-384-6025 |
|------------|------------------------------|------------------------------|-----------|-------------------------|---|
| Υ. | HALL PRANGLE & HOONVELD, LLC | 1160 NORTH TOWN CENTER DRIVE | SUITE 200 | LAS VEGAS, NEVADA 89144 | TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025 |

| 1 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
|----------|-----|---|
| 3 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – |
| 4 | | 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F) |
| 5 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. |
| 6 | | Bates Numbered ASSGIN000024 – 000035 (Exhibit G) |
| 7 | 0 | Steven Dale Farmer Staffing Sheets. |
| 8 | 8. | Bates Numbered STAFF000001 – 000003 (Exhibit H) |
| 10 | | |
| 10 | 9. | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 |
| 12 | | (Exhibit I) |
| 12 | 10. | Privilege Log for Schedule of Steven Dale Farmer |
| 14 | | (Exhibit J) |
| 15 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 |
| 16 | | (Exhibit K) |
| 17 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) |
| 18 | 12 | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 |
| 19 20 | 13. | bates labeled CHH00322 – CHH00325 (Exhibit M) |
| 21 | | Privilege Log for Centennial Hills Hospital HR. File for Steven Dale Farmer |
| 21 | 14. | (Exhibit N) |
| 23 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled |
| 24 | | СНН00326 – СНН00365 |
| 25 | | (Exhibit O) |
| 26 | 16. | Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 |
| 27 | | (Exhibit P) |
| 28 | /// | |
| 30 | | \cdot \cdot \cdot |
| | | |
| | 11 | |

| \bigcirc | 1 2 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372 (Exhibit Q) |
|---|----------------|-----|---|
| | 3 | 18. | Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD) |
| | 5 | 19. | Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 – Chop00038 (Exhibit S attached hereto via CD) |
| | 6 7 | 20. | Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD) |
| | 8 9 | 21. | Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD) |
| LD, LLC ve 702-384-6025 | 10 11 | 22. | Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD) |
| HOONVELD, LLC CENTER DRIVE 200 VADA 89144 FACSIMILE: 702-384-602. | 12 13 | 23. | Las Vegas Metropolitan Police Department's Criminal File of Steven Dale Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. |
| & HOO Town Center Suff 200 As, Nevada 8 | 14 | | (Exhibit W attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| HALL PRANGLE & HOONVE 1160 North Town Center Dri Sutte 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: | 15 16 17 | 24. | Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| HALL P | 18 19 | 25. | Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| | 20 21 | 26. | Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005) |
| t | 22 23 | 27. | Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010) |
| | 24 25 | 28. | Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013) |
| | 26 27 | 29. | Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC) |
| | 28 | 111 | |

ľ

| 1 | 30. | Centennial Hills Hospital Managerial Hierarchy Chart (Exhibit DD attached hereto and bates labeled CHH00373) |
|----------|-----------------|--|
| 2 | 31. | Job Description – RN I |
| 3 | 51. | (Exhibit EE attached hereto and bates labeled CHH00374 – 00380) |
| 4 ~ 5 | 32. | Job Description – RN III (Exhibit FF attached hereto and bates labeled CHH00381 – 00387) |
| 6 | 33. | Job Description – Unit Coordinator/ED Tech (Exhibit GG attached hereto and bates labeled CHH00388 – 00395) |
| 8 | 34. | Policy and Procedure – Chain of Command (Exhibit HH attached hereto and bates labeled P&P0014-0017) |
| 9 10 | 35. | Privilege Log Regarding Patient Relations Log from February, March, April and May, 2008 (Exhibit II attached hereto) |
| 11 12 | 36. | Patient Relations Log (Exhibit JJ attached hereto and bates labeled PtRelations0001-0009) |
| 13 | 37. | Privilege Log Regarding Risk Events from February, March, April and May, 2008 (Exhibit KK attached hereto) |
| 14 15 | 38. | Risk Events (Exhibit LL attached hereto and bates labeled RiskEvents0001-0026) |
| 16 | | Privilege Log Regarding Grievance Log (Exhibit MM attached hereto) |
| 17 18 | 39. | |
| 18 | 40. | Grievance Log (Exhibit NN attached hereto and bates labeled Grievance0001-0018) |
| 20 | 41. | Bureau of Health Care Quality and Compliance for Centennial Hills Hospital Medical Center (Exhibit OO attached hereto and bates |
| 21 | | Labeled BHCQ0001-0038) |
| 22 | 42. | Privilege Log Regarding Incident Report (Exhibit PP attached hereto) |
| 23 24 | 43. | Centennial Hills Hospital Incident Report (Exhibit QQ attached hereto and bates labeled |
| 25 | | CHH Incident Report00001-00005) |
| 26 | | |
| 27 | /// · · · · · · | |
| 28 | 111 | |
| | | |
| | | Page 13 of 15 |

HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimilie: 702-384-6025

AA2382

|) | 1 | 44. Defendant reserves the right to supplement this list of documents. | | | | | | | |
|---|----------|--|--|--|--|--|--|--|--|
| | 2 | 45. Defendant reserves the right to utilize any document utilized or identified by any | | | | | | | |
| | 3 | other party to this litigation. | | | | | | | |
| | 4 | DATED this 13 th day of July, 2015. | | | | | | | |
| | 5 | HALL PRANGLE & SCHOONVELD, LLC | | | | | | | |
| | 6 | | | | | | | | |
| | 7 | By: /s/: John Bemis | | | | | | | |
| | 8 | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 | | | | | | | |
| | 9 | JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 | | | | | | | |
| | 10 | 1160 North Town Center Drive, Suite 200 | | | | | | | |
| LD, LLC ve 702-384-6025 | 11 | Las Vegas, NV 89144 Attorneys for Defendant | | | | | | | |
| G G | 12 | Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center | | | | | | | |
| HOONVE CENTER DRIV 00 ADA 89144 FACSIMILE: | 13 | | | | | | | | |
| Control CHOONVEL Town Center Drive Surre 200 as, Nevada 89144 400 FACSIMILE: 70 | 14 | | | | | | | | |
| LANGLE & CHOONVI [60 NORTH TOWN CENTER DR SUITE 200 LAS VEGAS, NEVADA 89144 702-889-6400 FACSIMILE: | 15 | | | | | | | | |
| HALL PRANGLE & 1160 north Ti 51 Las Vecas 122-889-640 felephone: 702-889-640 | 16 | | | | | | | | |
| HALL PR 11 Telephone: | 17 | | | | | | | | |
| HAJ | 18 19 | | | | | | | | |
| | 20 | , | | | | | | | |
| | 21 | | | | | | | | |
| | 22 | | | | | | | | |
| | 23 | /// | | | | | | | |
| | 24 | | | | | | | | |
| | 25 | | | | | | | | |
| | 26 | /// | | | | | | | |
| | 27 | | | | | | | | |
| \ \ | 28 | 111 | | | | | | | |
|) | | | | | | | | | |
| | | Page 14 of 15 | | | | | | | |
| | | | | | | | | | |

CERTIFICATE OF SERVICE

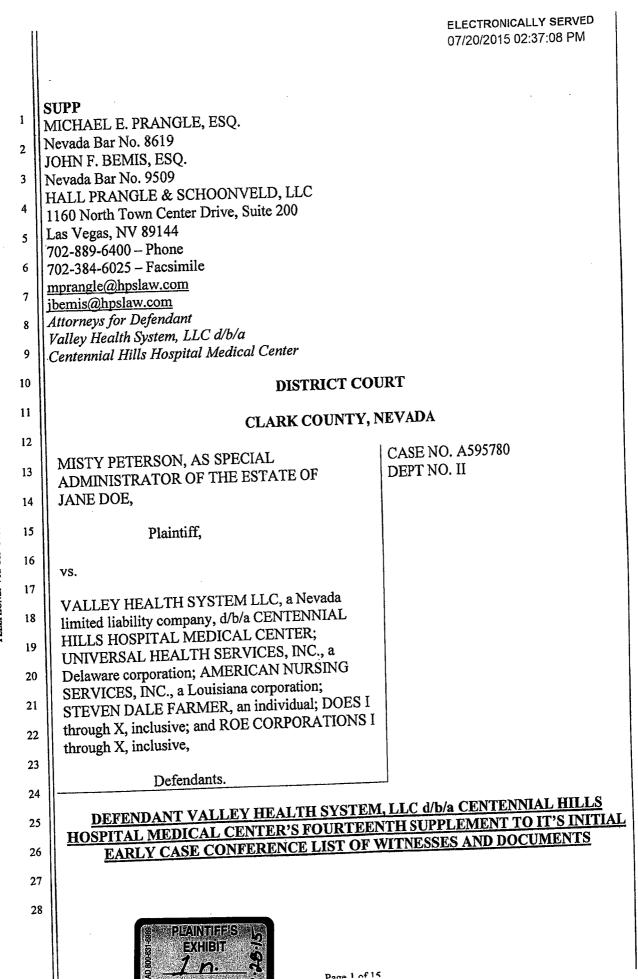
HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

د ا^{ین} ر

| . | <u>CERTIFICATE OF SERVICE</u> | | | | | | |
|--------|--|---|--|--|--|--|--|
| 1 | I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, | | | | | | |
| 3 | LLC; that on the 13 th day of July, 2015, I served a true and correct copy of the foregoing | | | | | | |
| 4 | DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS | | | | | | |
| 5 | HOSPITAL MEDICAL CENTER'S THIRT | ENNETH SUPPLEMENT TO IT'S INITIAL | | | | | |
| 6 7 | EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service | | | | | | |
| 8 | on Wiznet pursuant to mandatory NEFCR 4(b) | to the following parties: | | | | | |
| 9 | Robert E. Murdock, Esq. | Eckley M. Keach, Esq. ECKLEY M. KEACH, CHTD. | | | | | |
| 10 | MURDOCK & ASSOCIATES, CHTD. 520 South Fourth Street | 520 South Fourth Street | | | | | |
| 11 | Las Vegas, Nevada 89101 | Las Vegas, Nevada 89101 | | | | | |
| 12 | Attorneys for Plaintiff | Attorneys for Plaintiff | | | | | |
| | S. Brent Vogel, Esq. | Robert C. McBride, Esq. | | | | | |
| 13 | LEWIS BRISBOIS BISGAARD & SMITH | CARROL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY | | | | | |
| 14 | 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 | 8329 W. Sunset Road, Suite 260 | | | | | |
| 15 | -and- | Las Vegas, NV 89113 | | | | | |
| 16 | James P.C. Silvestri, Esq. PYATT SILVESTRI | Attorneys for Defendant Steven Dale Farmer Attorneys for | | | | | |
| 17 | 701 Bridger Ave., Suite 600 | Defendant | | | | | |
| 18 | Las Vegas, NV 89101 | Steven Dale Farmer | | | | | |
| 19 | Attorneys for Defendant American Nursing Services, Inc. | | | | | | |
| | | | | | | | |
| 20 | /s/: Audre | y Ann Stephanski | | | | | |
| 21 | An employee of H | HALL PRANGLE & SCHOONVELD, LLC | | | | | |
| 22 | | | | | | | |
| 23 | 4833-0748-1637, v. 1 | | | | | | |
| 24 | · . | | | | | | |
| 25 | | | | | | | |
| 26 | | | | | | | |
| 27 | | | | | | | |
| 28 | | : | | | | | |
| 20 | | | | | | | |
| | | | | | | | |
| | | | | | | | |

Page 15 of 15

TAB 52



HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center DRIVE Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

AA2385

DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its Fourteenth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements provided in **bold**):

I.

WITNESSES

Jane Doe

 c/o Robert E. Murdock, Esq.
 MURDOCK & ASSOCIATES, CHTD.
 521 South Third Street
 Las Vegas, Nevada 89101

Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages.

2. Jane Doe's two sons

Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding this matter, their mother's alleged damages and conversations they had with their mother about the incident.

| 3. | Steven Dale Farmer c/o Robert C. McBride, Esq. CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY 701 North Green Valley Parkway, Suite 200 Henderson, Nevada 89074 |
|----|--|
|----|--|

Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him.

23
24
25
26
4. Debra Scott, MSN, RN, FRE Executive Director Nevada State Board of Nursing 5011 Meadowwood Mall Way, Suite 300 Reno, NV 89502-6567

Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The

Dawa 7 af 15

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Sutte 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facemale: 702-384-6025

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

| 1 | Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). |
|-------------|--|
| 3 | 5. Michael Egstad, Manager I |
| | Licensing and Certification Program |
| 4 | California Department of Public Health (CDPH) ATCS - MS 3301 |
| 5 | P.O. Box 997416 |
| 6 | 1615 Capitol Avenue Sacramento, CA 95899-7416 |
| 7 | |
| 8 | Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. |
| 10 | Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number |
| 11 | Revocation of Steven Dale Farmer's CNA Certificate (Home House Construction of 00199703, Nurse Assistant Certificate 00659300). |
| 12 | 6. Collado Jeunnesse, RN |
| 13 | Kim Moon, RN |
| 14 | Abraham Deppa, CNA Nikki Carter, CNA |
| | Marina McDowell, CNA |
| 15 | Alana Schons, CNA Nelina Arante, RN |
| 16 | Ronald Lodevico |
| 17 | Venise Abelard, CNA Paula Mosley, RN |
| 18 | Pamela Flagg, CNA |
| 19 | Amber Vergara Loretta Korinis |
| 20 | Michelle Lucas |
| 21 · | The above identified nurses and certified Nurses' Assistants are expected to testify as to |
| 22 | the care and treatment rendered as well as the facts and circumstances surrounding this matter. |
| 23 | 7. Curtis E. Bazemore, M.D. |
| 24 | Cobinder S. Chopra, M.D. James E. Mock, M.D. |
| 25 | The above identified physicians are expected to testify as to the care and treatment |
| 26 | The above identified physicians are expected to testify as to the oute and inclusion rendered as well as the facts and circumstances surrounding this matter. |
| 27 | |
| 28 | |
| | |
| | |
| | Page 2 of 15 |

HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Sute 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025 1²

N.

| | 11 | | | | | |
|---|----|--|--|--|--|--|
| | | | | | | |
| | 1 | 8. Employees, former employees, representatives of and former representatives of American | | | | |
| | 2 | Nursing Services, Inc., c/o LEWIS BRISBOIS BISGAARD & SMITH | | | | |
| | 3 | 6385 South Rainbow Blvd., Suite 600 | | | | |
| | 4 | Las Vegas, NV 89118 | | | | |
| | 5 | The above described witnesses are expected to be identified during discovery and to | | | | |
| | 6 | The above described witnesses are expected to be latitude for and the incident in testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed | | | | |
| SUITE 200 LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025 | 7 | regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. | | | | |
| | 8 | 9. Crystal Johnson | | | | |
| | 9 | 4650 North Rainbow Blvd., #2109 Las Vegas, NV 89108 | | | | |
| | 10 | 714-580-5383 | | | | |
| | 11 | Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. | | | | |
| | 12 | 10. Douglas Nichols | | | | |
| oa 891 Acsimi | 13 | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC | | | | |
| SUITE 200 AS, NEVAI 400 F/ | 14 | 1160 North Town Center Drive, Suite 200 | | | | |
| SUIT LAS VEGAS, N 02-889-6400 | 15 | Las Vegas, NV 89144 | | | | |
| | 16 | Mr. Nichols is expected to testify as to the facts and circumstances surrounding this | | | | |
| IONE: | 17 | matter. | | | | |
| LELEPB | 18 | 11. Mary Jo Solon Southwest Medical Associates | | | | |
| - | 19 | Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. | | | | |
| | 20 | Ms. Solon is expected to testily as to the facts and chedinetic chedinetic contracts of the second s | | | | |
| | 21 | 12. Matthew Ross Rawson-Neal Psychiatric Hospital | | | | |
| | 22 | 1650 Community College Dr. | | | | |
| | 23 | Las Vegas, NV 89146 | | | | |
| | 24 | Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. | | | | |
| | 25 | 13. Michelle Simmons | | | | |
| | 26 | 5336 Fireside Ranch Ave. Las Vegas, NV 89131 | | | | |
| | 27 | Las vogas, iv or io | | | | |
| | 28 | | | | | |
| | | | | | | |
| | | Page 4 of 15 | | | | |
| | | | | | | |

HALL PRANGLE & DEHONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144

AA2388

| 1 | Ms. Simmons is expected to testify as to the facts and circumstances surrounding this matter. | | |
|----|---|--|--|
| 2 | | | |
| 3 | 14. Salvatore Sparacino c/o John F. Bemis, Esq. | | |
| 4 | HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 | | |
| 5 | Las Vegas, NV 89144 | | |
| 6 | Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this | | |
| 7 | matter. | | |
| 8 | 15. Nida Ibasco Canque, RN | | |
| 9 | 7940 Quail Breast Lane Las Vegas, NV 89131 | | |
| 10 | (This is last known address) | | |
| 11 | Nurse Canque was a night-shift nurse during the time period of February through June | | |
| 12 | 2008, and therefore, may have knowledge and information about the facts and circumstance surrounding this matter. | | |
| 13 | | | |
| 14 | 16. Asuncion Layug, RN 8920 Rendon Street | | |
| 15 | Las Vegas, NV 89143 (This is last known address) | | |
| 16 | Nurse Layug was a night-shift nurse during the time period of February through June | | |
| 17 | 2008, and therefore, may have knowledge and information about the facts and circumstances | | |
| 18 | surrounding this matter. | | |
| 19 | 17. Alxenia Priscilla Brown-Gay, RN | | |
| 20 | 5973 Spinnaker Point Avenue Las Vegas, NV 89110 | | |
| 21 | (This is last known address) | | |
| 22 | Nurse Brown-Gay was a night-shift nurse during the time period of February through | | |
| 23 | June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | |
| 24 | /// | | |
| 25 | | | |
| 26 | /// | | |
| 27 | 111 | | |
| 28 | /// | | |
| | | | |
| | | | |
| | Page 5 of 15 | | |

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suffe 200 Las Vegas, Nevada 89144 Telepeone: 702-889-6400 Facsmale: 702-384-6025

. |

| 1 | 18. Emma Birrey Cortez, RN 1835 Pallid Swift Court North Las Vegas, NV 89084 | | | | |
|----------|--|--|--|--|--|
| 2 | (This is last known address) | | | | |
| 3 | Nurse Cortez was a night-shift nurse during the time period of February through June | | | | |
| 4 | 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | | |
| | 19. Maria Asuncion Katri E. Dakudao, RN | | | | |
| | 5201 Meadows Lily Avenue | | | | |
| | Las Vegas, NV 89108 (This is last known address) | | | | |
| | D Lucks and a night shift purse during the time period of February through June | | | | |
| 10 | 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | | |
| 11 | | | | | |
| 12 | 20. Jenette Luoang Banas, RN c/o Michael E. Prangle, Esq., and | | | | |
| 13 | John F. Bemis, Esq. | | | | |
| 14 | HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 | | | | |
| 15 | | | | | |
| 16 17 | Nurse Banas was a night-shift nurse during the time period of February through Jur 2008, and therefore, may have knowledge and information about the facts and circumstance surrounding this matter. | | | | |
| 18 | 21. Tiffiney Diane Bills, CNA | | | | |
| 19 | 4230 Valley Regents Drive | | | | |
| 20 | North Las Vegas, NV 89032 (This is last known address) | | | | |
| 21 | Description of February through June 2008, | | | | |
| 22 | and therefore, may have knowledge and information about the facts and encounteracted | | | | |
| 23 | surrounding this matter. | | | | |
| 24 | 22. Deepa Abraham, LPN 4515 N. Las Vegas Blvd., Bldg. 78, #1003 | | | | |
| | Las Vegas, NV 89115 | | | | |
| | (This is last known address) | | | | |
| 20 | Ms. Abraham was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances | | | | |
| 28 | surrounding this matter. | | | | |
| | | | | | |
| | Dage 6 of 15 | | | | |
| | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 | | | | |

. ? 1. .

Cindy L. Parmelee 23. 4516 Mohawk River Avenue North Las Vegas, NV 89031 (This is last known address)

Ms. Parmelee was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 5

> Marie Bayrotie Pierre, RN 24. 8914 Bonneville Peak Court Las Vegas, NV 89148 (This is last known address)

Nurse Pierre was a night-shift RN during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

25. Ana Maria P. Salcedo, RN 3832 Kettle Falls Avenue North Las Vegas, NV 89085 (This is last known address)

Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

Charlene Walker-Lexing, 26. 3829 Moonshine Falls Avenue North Las Vegas, NV 89085 (This is last known address)

Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter.

| 27. | Virginia D. De Chavez |
|-----|------------------------------|
| | 12338 Holly Jane Court |
| | Orlando, FL 32824 |
| | (This is last known address) |

25 De Chavez was an RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and 26 information about the facts and circumstances surrounding this matter. 27

28

1

2

3

4

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

FACSIMILE: 702-384-6025

LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE:

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVI

SUITE 200

| 1 | Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle 3937 Sierra Sun Street North Las Vegas, NV 89032 (This is last known address) | | | |
|------------------|---|--|--|--|
| 3 4 5 | On information and belief, Ms. Hutchinson was a night-shift CNA during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | |
| 6 7 8 9 | 29. Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN 224 Algiers Drive Venice, FL 34293 (This is last known address) | | | |
| 10 11 | Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | |
| 12 13 14 | 30. Paula L. Mosley, RN 5880 Boulder Falls Street Henderson, NV 89011 (This is last known address) | | | |
| 15 16 | Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | |
| 17 18 19 | 31. Amy Dee Schuele, RN 5277 Drifting Sands Court Las Vegas, NV 89149 (This is last known address) | | | |
| 20 21 22 | Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | |
| 23 24 25 | 32. Victoria Stringer, RN 2208 Frostproof Street Las Vegas, NV 89128 (This is last known address) | | | |
| 26 27 | Nurse Stringer was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. | | | |
| 28 | Page & of 15 | | | |

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

33. Lorraine F. Wescott, RN 1 8888 Sparkling Creek Avenue Las Vegas, NV 89143 2 (This is last known address) 3 Nurse Wescott was a RN who sometimes worked double shifts (from day to night) during the time period of February through June 2008, and therefore, may have knowledge and 4 information about the facts and circumstances surrounding this matter. 5 6 Ma Ramona Ticao Albunan 34. 10 Forest Grove Drive, #21 7 Daly City, CA 94015 (This is last known address) 8 Nurse Albunan was a RN who sometimes worked as the evening Nurse Clinical 9 Supervisor during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and circumstances surrounding this matter. 10 11 Vickie A. Johnson, RN 35. 12 9129 Amber Waves Street Las Vegas, NV 89123 13 (This is last known address) LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 FAC 14 Nurse Johnson was a former Director of Nursing during the time period of February through June 2008, and therefore, may have knowledge and information about the facts and 15 circumstances surrounding this matter. 16 Lilibeth Parejas, RN 36. 17 Bernadine Rebogio, RN 37. 18 Janice Collado, RN 38. Darlene Infante Carbonell, RN 39. 19 Maria Dacquell, CNA 40. Rhona Lopez 41. 20 Aman McPherson 42. 21 Ailynne Belbis 43. Larena Abdul 44. 22 Rebecca Cronister 45. c/o John F. Bemis, Esq. 23 HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 24 Las Vegas, NV 89144 25 The above-named individuals, Parejas - Cronister (#36-45), are current employees of 26 Defendant, Valley Health System, LLC, and have been identified by Defendant as having worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor 27 28

Dera O of 14

702-384-6025

FACSIMILE:

89144

HALL PRANGLE & CHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVI

SUITE 200

AA2393

in February and/or March of 2008, and may have knowledge and information about the alleged 1 incident with the elderly patient to which Nurse Murray referred in her deposition testify. 2 46. Carol Butler 9079 William Cody Dr. 3 Evergreen, CO 80439 4 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the 5 events surrounding the instant litigation. 6 Amy Blasing, formerly Amy Bochenek 47. 7 9521 San Mateo Blvd. NE Albuquerque, NM 87113 8 Ms. Blasing is the former director of the Emergency Department at the time of the events 9 surrounding the instant litigation. 10 48. Darby Curly 11 4021 Cherokee Rose Ave 12 N Las Vegas, NV 89031 13 Mr. Curly is a former charge nurse in the Emergency Department at the time of the events surrounding the instant litigation. 14 Defendant reserves the right to supplement its list of witnesses. 15 49. 16 Defendant reserves the right to call any witnesses identified by any other parties 50. in this litigation. 17 18 II. 19 DOCUMENTS 20 Jane Doe's medical records Bates Stamped CH00001 through CH00317 1. 21 (Exhibit A on CD). 22 Centennial Hills Hospital Daily Security Logs 2. Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD). 23 24 Records produced by Nevada State Board of Nursing 3. (Exhibit C on CD). 25 Centennial Hills Hospital Job Description for CNA 26 4. Bates Numbered Unit Coord/C N A -1 -8 (Exhibit D on attached CD). 27 28

Las Vecas, Nevada 89144 Telephone: 702-889-6400 FACSIMILE: 702-384-6025

SUITE 200

HALL PRANGLE & HOONVELD, LLC

Page 10 of 15

| $\langle \gamma \rangle$ | 1 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
|---|----------------|-----|--|
| | 3 4 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F) |
| | 5 6 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G) |
| | 7 8 9 | 8. | Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H) |
| LD, LLC 1E 702-384-6025 | 10 11 | 9. | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| & CHOONVELD, LLC We CHOONVELD, LLC Town Center Drive SUITE 200 AS, NEVADA 89144 AS, NEVADA 89144 A00 FACSIMILE: 702-384-602 | 12 13 14 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J) |
| RANGLE & CHOONVEL 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 1: 702-889-6400 Facsimile: 70 | 15 16 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K) |
| HALL PRANGLE 1160 North 1 Las Veg 1 Leephone: 702-889-66 | 17 18 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) |
| H. Tai | 19 20 | 13. | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 – CHH00325 (Exhibit M) |
| | 21 22 | 14. | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N) |
| | 23 24 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 – CHH00365 (Exhibit O) |
| | 25 26 | 16. | Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P) |
| | 27 28 | /// | |
| | | | Dage 11 of 14 |

| 1 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372 (Exhibit Q) |
|----------|-----|---|
| 3 | 18. | Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD) |
| 4 5 | 19. | Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 – Chop00038 (Exhibit S attached hereto via CD) |
| 6 7 | 20. | Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD) |
| 8 9 | 21. | Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD) |
| 10 11 | 22. | Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD) |
| 12 | 23. | Las Vegas Metropolitan Police Department's Criminal File of Steven Dale Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log. |
| 13 14 | | (Exhibit W attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 15 16 | 24. | Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer bates labeled LVMPD0191 – LVMPD0196. |
| 16 | | (Exhibit X attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 18 19 | 25. | Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD) CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER. |
| 20 21 | 26. | Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005) |
| 22 23 | 27. | Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010) |
| 24 25 | 28. | Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013) |
| 25 | 29. | Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC) |
| 27 28 | 1 | |
| | | |
| | | Page 12 of 15 |

HALL PRANGLE & CHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

| 1 | 30. | Centennial Hills Hospital Managerial Hierarchy Chart (Exhibit DD attached hereto and bates labeled CHH00373) |
|----------|------|--|
| 2 3 | 31. | Job Description – RN I (Exhibit EE attached hereto and bates labeled CHH00374 – 00380) |
| 4 5 | 32. | Job Description – RN III (Exhibit FF attached hereto and bates labeled CHH00381 – 00387) |
| 6 7 | 33. | Job Description – Unit Coordinator/ED Tech (Exhibit GG attached hereto and bates labeled CHH00388 – 00395) |
| 8 9 | 34. | Policy and Procedure – Chain of Command (Exhibit HH attached hereto and bates labeled P&P0014-0017) |
| 10 | 35. | Privilege Log Regarding Patient Relations Log from February, March, April and May, 2008 (Exhibit II attached hereto) |
| 11 12 | 36. | Patient Relations Log (Exhibit JJ attached hereto and bates labeled PtRelations0001-0009) |
| 13 14 | 37. | Privilege Log Regarding Risk Events from February, March, April and May, 2008 (Exhibit KK attached hereto) |
| 15 16 | 38. | Risk Events (Exhibit LL attached hereto and bates labeled RiskEvents0001-0026) |
| 17 | 39. | Privilege Log Regarding Grievance Log (Exhibit MM attached hereto) |
| 18 19 | 40. | Grievance Log (Exhibit NN attached hereto and bates labeled Grievance0001-0018) |
| 20 21 | 41. | Bureau of Health Care Quality and Compliance for Centennial Hills Hospital Medical Center (Exhibit OO attached hereto and bates Labeled BHCQ0001-0038) |
| 22 23 | 42. | Privilege Log Regarding Incident Report (Exhibit PP attached hereto) |
| 24 | 43. | Centennial Hills Hospital Incident Report (Exhibit QQ attached hereto and bates labeled CHH Incident Report00001-00005) |
| 25 26 | 44. | 2009 Patient Safety Fair Documents (Exhibit RR attached hereto and bates labeled 09PTSFTY00001-00002) |
| 27 28 | | (EXHIDIL AN ALLACHEU HEICIU ANU DAIGS IADGEU 071 ISF I 100001-00002) |
| | | |

HALL PRANGLE Construction VELD, LLC 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Teleprone: 702-389-6400 Facsimile: 702-384-6025

1.0

1 Service Excellence Commitment Agreement 45. (Exhibit SS attached hereto and bates labeled Service00001-00006) 2 Defendant reserves the right to supplement this list of documents. 46. 3 Defendant reserves the right to utilize any document utilized or identified by any 4 47. 5 other party to this litigation. 6 DATED this 20th day of July, 2015. 7 HALL PRANGLE & SCHOONVELD, LLC 8 9 By: 10 PRANGLE, ESQ. MICHAEL E. FACSIMILE: 702-384-6025 HALL PRANGLE weichoonveld, LLC Nevada Bar No. 8619 11 JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 12 1160 NORTH TOWN CENTER DRIVE SUITE 200 1160 North Town Center Drive, Suite 200 LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 13 Las Vegas, NV 89144 Attorneys for Defendant 14 Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center 15 16 17 18 19 20 21 22 /// 23 24 /// 25 26 /// 27 /// 28 Page 14 of 15

CERTIFICATE OF SERVICE 1 I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 20th day of July, 2015, I served a true and correct copy of the foregoing 3 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 4 5 HOSPITAL MEDICAL CENTER'S FOURTEENTH SUPPLEMENT TO IT'S INITIAL 6 EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service 7 on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties: 8 9 Eckley M. Keach, Esq. Robert E. Murdock, Esq. ECKLEY M. KEACH, CHTD. MURDOCK & ASSOCIATES, CHTD. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiff Attorneys for Plaintiff 12 Robert C. McBride, Esq. S. Brent Vogel, Esq. 13 CARROL, KELLY, TROTTER, LEWIS BRISBOIS BISGAARD & SMITH FRANZEN, MCKENNA & PEABODY 6385 South Rainbow Blvd., Suite 600 14 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89118 15 Las Vegas, NV 89113 -and-Attorneys for Defendant James P.C. Silvestri, Esq. 16 Steven Dale Farmer Attorneys for PYATT SILVESTRI 701 Bridger Ave., Suite 600 Defendant 17 Steven Dale Farmer Las Vegas, NV 89101 18 Attorneys for Defendant American Nursing Services, Inc. 19 20 That An employee of HALL PRANGLE & SCHOONVELD, LLC 21 22 4827-3732-5862, v. 1 23 24 25 26 27 28

Down 14 af 14

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Sutte 200 Las Vegas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

IN THE SUPREME COURT OF NEVADA

Electronically Filed Aug 16 2016 09:31 a.m. Tracie K. Lindeman Clerk of Supreme Court

VALLEY HEALTH SYSTEM, LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; AND UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation,

Appellants,

vs.

ESTATE OF JANE DOE, BY AND THROUGH ITS SPECIAL ADMINISTRATOR, MISTY PETERSON,

Respondent.

APPEAL FROM THE EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA HONORABLE JUDGE RICHARD SCOTTI, CASE NO. A-09-595780-C

APPELLANTS' APPENDIX TO OPENING BRIEF

VOLUME XI of XVII

Docket 70083 Document 2016-25347

DENNIS L. KENNEDY, NEV. BAR NO. 1462 JOSEPH A. LIEBMAN, NEV. BAR NO. 10125 JOSHUA P. GILMORE, NEV. BAR. NO. 11576 **BAILEY & KENNEDY** 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148 TELEPHONE: (702) 562-8820 FACSIMILE: (702) 562-8821 DKENNEDY @ BAILEYKENNEDY.COM JLIEBMAN @ BAILEYKENNEDY.COM

MICHAEL E. PRANGLE, NEV. BAR NO. 8619 KENNETH M. WEBSTER, NEV. BAR NO. 7205 JOHN F. BEMIS, NEV. BAR NO. 9509 HALL PRANGLE & SCHOONVELD, LLC 1160 N. TOWN CENTER DRIVE, STE. 200 LAS VEGAS, NEVADA 89144 TELEPHONE: 702.889.6400 FACSIMILE: 702.384.6025 MPRANGLE@HPSLAW.COM KWEBSTER@HPSLAW.COM

Attorneys for Appellants

APPENDIX TO APPELLANTS' OPENING BRIEF

VOLUME XI of XVII

TABLE OF CONTENTS

| <u>Tab</u> | Document Title: | Page |
|------------|---|---------|
| <u>No.</u> | | Nos.: |
| 35 | Defendant's Exhibit A – Las Vegas Metropolitan | AA2052- |
| | Police Dept. File – PART TWO | AA2243 |
| | | |
| 36 | Defendant's Exhibit A-1 (Pictures of Defendant | AA2244- |
| | Farmer) | AA2249 |
| 37 | Plaintiff's Exhibit 1 – Defendant Centennial Hills | AA2250- |
| | Hospital and Universal Health Services, Inc.'s Initial | AA2254 |
| | Early Case Conference List of Witnesses and | |
| | Documents dated November 24, 2009 | |
| 38 | Plaintiff's Exhibit 1 – Photo of Universal Health | AA2255- |
| | Services Address with Vault Exhibit Form | AA2256 |
| 39 | Plaintiff's Exhibit 1a – Defendant Centennial Hills | AA2257- |
| | Hospital and Universal Health Services, Inc.'s First | AA2262 |
| | Supplement to Its Initial Early Case Conference List of | |
| | Witnesses and Documents dated April 16, 2010 | |
| 40 | Plaintiff's Exhibit 1b – Defendant Valley Health | AA2263- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2269 |
| | Center's Second Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | February 12, 2013 | |
| 41 | Plaintiff's Exhibit 1c – Defendant Valley Health | AA2270- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2275 |
| | Center's Third Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | March 11, 2013 | |
| 42 | Plaintiff's Exhibit 1d – Defendant Valley Health | AA2276- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2281 |
| | Center's Fourth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | March 12, 2013 | |

| 43 | Plaintiff's Exhibit 1e – Defendant Valley Health | AA2282- |
|----|---|---------|
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2288 |
| | Center's Fifth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | March 18, 2013 | |
| 44 | Plaintiff's Exhibit 1f – Defendant Valley Health | AA2289- |
| | System, LLC d/b/a Centennial Hills Hospital Medical | AA2296 |
| | Center's Sixth Supplement to Its Initial Early Case | |
| | Conference List of Witnesses and Documents dated | |
| | June 7, 2013 | |

APPENDIX TO APPELLANTS' OPENING BRIEF

ALPHABETICAL INDEX

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Amended Complaint filed August 21, 2009 | Ι | 2 | AA0007- |
| | | | AA0012 |
| Complaint filed July 23, 2009 | Ι | 1 | AA0001- |
| | | | AA0006 |
| Defendant American Nursing Services, | Х | 27 | AA1822- |
| Inc.'s Joinder to Plaintiff's Opposition to | | | AA1824 |
| Defendants Valley Health System LLC | | | |
| d/b/a Centennial Hills Hospital Medical | | | |
| Center and Universal Health Services, Inc.'s | | | |
| Motion for Reconsideration of this Court's | | | |
| November 4, 2015 Order filed December 4, | | | |
| 2015 | | | |
| Defendant Steven Dale Farmer's Limited | Ι | 5 | AA0094- |
| Opposition to Plaintiff's Motion for | | | AA0098 |
| Summary Judgment Re: Liability filed | | | |
| October 13, 2014 | | | |
| Defendant Universal Health Services, Inc.'s | Ι | 3 | AA0013- |
| Answer to Plaintiff's Amended Complaint | | | AA0021 |
| filed September 11, 2013 | | | |
| Defendants Centennial Hills Hospital and | Ι | 7 | AA0113- |
| Universal Health Services, Inc.'s Errata to | | | AA0116 |
| their Opposition to Plaintiff's Motion for | | | |
| Summary Judgment Re: Liability and | | | |
| Joinder to Defendant Steven Dale Farmer's | | | |
| Limited Opposition October 16, 2014 | | | |
| Defendants Valley Health System LLC | IV | 20 | AA0612- |
| d/b/a Centennial Hills Hospital Medical | | | AA0735 |
| Center and Universal Health Services, Inc.'s | | | |
| Brief in Support of Their Position Re: | | | |
| Evidentiary Hearing filed August 26, 2015 | | | |

| Document Title: | Volume No.: | Tab No. | Page Nos.: |
|--|----------------|-------------------|------------|
| Defendants Valley Health System LLC d/b/a | XVII | <u>No.:</u> 84 | AA3306- |
| Centennial Hills Hospital Medical Center and | ΛΫΠ | 04 | AA3308 |
| Universal Health Services, Inc.'s Joint Notice | | | 1113300 |
| of Appeal filed March 30, 2016 | | | |
| Defendants Valley Health System LLC | VIII | 25 | AA1390- |
| d/b/a Centennial Hills Hospital Medical | | | AA1589 |
| Center and Universal Health Services, Inc.'s | | | |
| Motion for Reconsideration of this Court's | | | |
| November 4, 2015 Order filed November | | | |
| 19, 2015 | | | |
| Defendants Valley Health System LLC | III | 13 | AA0469- |
| d/b/a Centennial Hills Hospital Medical | | | AA0487 |
| Center and Universal Health Services, Inc.'s | | | |
| Opposition to Plaintiff's Motion for NRCP | | | |
| 37 Sanctions filed May 13, 2015 | | | |
| Defendant's Exhibit A – Las Vegas | X & XI | 35 | AA1867- |
| Metropolitan Police Dept. File | | | AA2050 |
| Defendant's Exhibit A-1 (Pictures of | XI | 36 | AA2244- |
| Defendant Farmer) | | | AA2249 |
| Defendant's Exhibit List from Vault | Х | 33 | AA1863 |
| Discovery Commissioner's Report and | IV | 19 | AA0605- |
| Recommendations filed August 19, 2015 | | | AA0611 |
| Evidentiary Hearing Brief in Support of the | V | 21 | AA0736- |
| Striking of Defendant Centennial Hills | | | AA0948 |
| Hospital's Answer to Plaintiff's Amended | | | |
| Complaint and Affirmative Defenses filed | | | |
| August 26, 2015 | | | |
| Notice of Entry of Order Denying Motion | Х | 30 | AA1842- |
| for Reconsideration filed December 11, | | | AA1847 |
| 2015 | | | |
| Notice of Entry of Order on Plaintiff's | III | 10 | AA0352- |
| Motion for Summary Judgment Re: | | | AA0362 |
| Liability filed March 2, 2015 | | | |
| Notice of Entry of Order Striking Answer of | VII | 24 | AA1348- |
| Defendant Valley Health System LLC as | | | AA1389 |
| Sanction for Discovery Misconduct filed | | | |
| November 5, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|-------------|-------------|------------|
| | <u>No.:</u> | <u>No.:</u> | |
| Notice of Entry of Stipulation and Order for | Х | 32 | AA1854- |
| Dismissal with Prejudice filed February 29, | | | AA1862 |
| 2016 | | | |
| Order Denying Motion for Reconsideration | Х | 29 | AA1839- |
| filed December 10, 2015 | | | AA1841 |
| Order Denying Petition for Writ of | III | 14 | AA0488- |
| Mandamus or Prohibition filed May 20, | | | AA0489 |
| 2015 | | | |
| Order on Plaintiff's Motion for Summary | III | 9 | AA0344- |
| Judgment Re: Liability filed February 27, | | | AA0351 |
| 2015 | | | |
| Order Setting Evidentiary Hearing filed | IV | 18 | AA0602- |
| August 4, 2015 | | | AA0604 |
| Order Striking Answer of Defendant Valley | VII | 23 | AA1309- |
| Health System LLC as Sanction for | | | AA1347 |
| Discovery Misconduct filed November 4, | | | |
| 2015 | | | |
| Plaintiff's Exhibit 1 – Defendant Centennial | XI | 37 | AA2250- |
| Hills Hospital and Universal Health | | | AA2254 |
| Services, Inc.'s Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated November 24, 2009 | | | |
| Plaintiff's Exhibit 1 – Photo of Universal | XI | 38 | AA2255- |
| Health Services Address with Vault Exhibit | | | AA2256 |
| Form | | | |
| Plaintiff's Exhibit 1a – Defendant | XI | 39 | AA2257- |
| Centennial Hills Hospital and Universal | | | AA2262 |
| Health Services, Inc.'s First Supplement to | | | |
| Its Initial Early Case Conference List of | | | |
| Witnesses and Documents dated April 16, | | | |
| 2010 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 1b – Defendant Valley | XI | 40 | AA2263- |
| Health System, LLC d/b/a Centennial Hills | | | AA2269 |
| Hospital Medical Center's Second | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated February 12, 2013 | | | |
| Plaintiff's Exhibit 1c – Defendant Valley | XI | 41 | AA2270- |
| Health System, LLC d/b/a Centennial Hills | | | AA2275 |
| Hospital Medical Center's Third | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated March 11, 2013 | | | |
| Plaintiff's Exhibit 1d – Defendant Valley | XI | 42 | AA2276- |
| Health System, LLC d/b/a Centennial Hills | | | AA2281 |
| Hospital Medical Center's Fourth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated March 12, 2013 | | | |
| Plaintiff's Exhibit 1e – Defendant Valley | XI | 43 | AA2282- |
| Health System, LLC d/b/a Centennial Hills | | | AA2288 |
| Hospital Medical Center's Fifth Supplement | | | |
| to Its Initial Early Case Conference List of | | | |
| Witnesses and Documents dated March 18, | | | |
| 2013 | | | |
| Plaintiff's Exhibit 1f – Defendant Valley | XI | 44 | AA2289- |
| Health System, LLC d/b/a Centennial Hills | | | AA2296 |
| Hospital Medical Center's Sixth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 7, 2013 | | | |
| Plaintiff's Exhibit 1g – Defendant Valley | XII | 45 | AA2297- |
| Health System, LLC d/b/a Centennial Hills | | | AA2304 |
| Hospital Medical Center's Seventh | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated October 27, 2014 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 1h – Defendant Valley | XII | 46 | AA2305- |
| Health System, LLC d/b/a Centennial Hills | | | AA2315 |
| Hospital Medical Center's Eighth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated April 22, 2015 | | | |
| Plaintiff's Exhibit 1i – Defendant Valley | XII | 47 | AA2316- |
| Health System, LLC d/b/a Centennial Hills | | | AA2326 |
| Hospital Medical Center's Ninth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 10, 2015 | | | |
| Plaintiff's Exhibit 1j – Defendant Valley | XII | 48 | AA2327- |
| Health System, LLC d/b/a Centennial Hills | | | AA2340 |
| Hospital Medical Center's Tenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 16, 2015 | | | |
| Plaintiff's Exhibit 1k – Defendant Valley | XII | 49 | AA2341- |
| Health System, LLC d/b/a Centennial Hills | | | AA2354 |
| Hospital Medical Center's Eleventh | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated June 17, 2015 | | | |
| Plaintiff's Exhibit 11 – Defendant Valley | XII | 50 | AA2355- |
| Health System, LLC d/b/a Centennial Hills | | | AA2369 |
| Hospital Medical Center's Twelfth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 10, 2015 | | | |
| Plaintiff's Exhibit 1m – Defendant Valley | XII | 51 | AA2370- |
| Health System, LLC d/b/a Centennial Hills | | | AA2384 |
| Hospital Medical Center's Thirteenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 13, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|-------------|------------|
| | No.: | <u>No.:</u> | |
| Plaintiff's Exhibit 1n – Defendant Valley | XII | 52 | AA2385- |
| Health System, LLC d/b/a Centennial Hills | | | AA2399 |
| Hospital Medical Center's Fourteenth | | | |
| Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated July 20, 2015 | | | |
| Plaintiff's Exhibit 2 – Centennial Security | XII | 53 | AA2400- |
| Daily Activity Logs May 14-16, 2008 | | | AA2421 |
| Plaintiff's Exhibit 3 – Deposition Transcript | XII | 54 | AA2422- |
| of Renato Sumera, RN taken on May 1, | | | AA2461 |
| 2015 | | | |
| Plaintiff's Exhibit 4 – Universal Health | XII | 55 | AA2462- |
| Services Incident Report dated May 15, | | | AA2464 |
| 2008 | | | |
| Plaintiff's Exhibit 5 – Complaint for Money | XII | 56 | AA2465- |
| Damages, Cagnina v. Centennial Hills | | | AA2489 |
| Hospital Medical Center, et al., Case No. | | | |
| A570756, filed September 2, 2008 and First | | | |
| Amended Complaint for Money Damages, | | | |
| Cagnina v. Centennial Hills Hospital | | | |
| Medical Center, et al., Case No. A570756, | | | |
| filed April 28, 2010 | | | |
| Plaintiff's Exhibit 6 – Deposition Transcript | XIII | 57 | AA2490- |
| of Christine Murray dated January 27, 2010 | | | AA2566 |
| Plaintiff's Exhibit 7 – Deposition Transcript | XIII | 58 | AA2567- |
| of Amy Bochenek dated March 10, 2010 | | | AA2589 |
| Plaintiff's Exhibit 8 – Deposition Transcript | XIII | 59 | AA2590- |
| of Amy Blasing, MSN, RN dated July 28, | | | AA2621 |
| 2015 | | | |
| Plaintiff's Exhibit 9 – Rule 16.1 Mandatory | XIII | 60 | AA2622 |
| Pretrial Discovery Requirements | | | |
| Plaintiff's Exhibit 10 – Public Defender's | XIV | 61 | AA2623- |
| Office E-mails | | | AA2757 |
| Plaintiff's Exhibit 10a – Chronology of | XIV | 62 | AA2758- |
| Public Defender's Office E-mails | | | AA2790 |

| Document Title: | Volume | Tab | Page Nos.: |
|---|-------------|-------------|------------|
| | <u>No.:</u> | <u>No.:</u> | |
| Plaintiff's Exhibit 11 – Letter from Amy | XIV | 63 | AA2791 |
| Feliciano to McBride, Bemis & Vogel dated | | | |
| January 31, 2013 | | | |
| Plaintiff's Exhibit 12 – Notice of Entry of | XIV | 64 | AA2792- |
| Order Re: Discovery Commissioner's | | | AA2804 |
| Report and Recommendations dated May 6, | | | |
| 2013 | | | |
| Plaintiff's Exhibit 13 – Christine Murray | XIV | 65 | AA2805- |
| Voluntary Statement to Las Vegas | | | AA2820 |
| Metropolitan Police Department dated June | | | |
| 13, 2008 | | | |
| Plaintiff's Exhibit 14 – Margaret Wolfe | XIV | 66 | AA2821- |
| Voluntary Statement to Las Vegas | | | AA2834 |
| Metropolitan Police Department dated May | | | |
| 30, 2008 | | | |
| Plaintiff's Exhibit 15 - Defendants Valley | III | 16 | AA0566- |
| Health System LLC d/b/a Centennial Hills | | | AA0580 |
| Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Objection to | | | |
| Discovery Commissioner Report and | | | |
| Recommendation filed July 30, 2015 | | | |
| Plaintiff's Exhibit 16 – Defendant Valley | XIV | 67 | AA2835- |
| Health Systems, LLC d/b/a Centennial Hills | | | AA2850 |
| Hospital Medical Center's Motion for | | | |
| Protective Order filed June 19, 2013 | | | |
| Plaintiff's Exhibit 17 – Discovery | XIV | 68 | AA2851- |
| Commissioner's Report and | | | AA2856 |
| Recommendation filed September 4, 2013 | | | |
| Plaintiff's Exhibit 18 – Defendants | Ι | 6 | AA0099- |
| Centennial Hills Hospital and Universal | | | AA0112 |
| Health Services, Inc.'s Opposition to | | | |
| Plaintiff's Motion for Summary Judgment | | | |
| Re: Liability and Joinder to Defendant | | | |
| Steven Dale Farmer's Limited Opposition | | | |
| filed October 14, 2014 | | | |

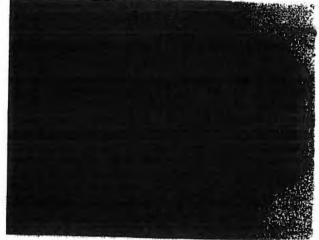
| Document Title: | Volume | Tab | Page Nos.: |
|---|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 19 – Petitioners Valley | III | 11 | AA0363- |
| Health System, LLC, d/b/a Centennial Hills | | | AA0406 |
| Medical Center's and Universal Health | | | |
| Services, Inc.'s Petition for Writ of | | | |
| Mandamus and/or Writ of Prohibition filed | | | |
| April 29, 2015 | | | |
| Plaintiff's Exhibit 20 – Rule 3.3 Candor | XIV | 69 | AA2857 |
| Toward Tribunal | | | |
| Plaintiff's Exhibit 21 – Recorder's | IV | 17 | AA0581- |
| Transcript of Proceedings – Plaintiff's | | | AA0601 |
| Motion for NRCP 37 Sanctions Against | | | |
| Valley Health System LLC d/b/a Centennial | | | |
| Hills Hospital Medical Center and Universal | | | |
| Health Services filed August 4, 2015 | | | |
| Plaintiff's Exhibit 22 – Deposition | XV | 70 | AA2858- |
| Transcript of Christine Murray dated | | | AA2880 |
| January 8, 2015 | | | |
| Plaintiff's Exhibit 23 – Deposition | XV | 71 | AA2881- |
| Transcript of Sajit Pullarkat dated August 7, | | | AA2896 |
| 2015 | | | |
| Plaintiff's Exhibit 24 – Deposition | XV | 72 | AA2897- |
| Transcript of PMK of Centennial Hills | | | AA2908 |
| Hospital (Sajit Pullarkat) dated August 7, | | | |
| 2015 | | | |
| Plaintiff's Exhibit 25 – Deposition | XV | 73 | AA2909- |
| Transcript of Janet Calliham dated August | | | AA2964 |
| 18, 2015 | | | |
| Plaintiff's Exhibit 26 – Deposition | XV | 74 | AA2965- |
| Transcript of Margaret Wolfe, RN dated | | | AA2984 |
| May 5, 2015 | | | |
| Plaintiff's Exhibit 27 – Defendant Valley | XV | 75 | AA2985- |
| Health System, LLC's Responses to | | | AA2989 |
| Plaintiff's Eleventh Set of Interrogatories | | | |
| dated June 12, 2015 | | | |

| Document Title: | Volume | Tab | Page Nos.: |
|--|--------|------|------------|
| | No.: | No.: | |
| Plaintiff's Exhibit 28 – Defendant Valley | XV | 76 | AA2990- |
| Health System, LLC's Responses to | | | AA2993 |
| Plaintiff's Tenth Set of Interrogatories dated | | | |
| June 10, 2015 | | | |
| Plaintiff's Exhibit 29 – Las Vegas | XVI | 77 | AA2994- |
| Metropolitan Police Department's Criminal | | | AA3185 |
| file of Steven Dale Farmer bates labeled | | | |
| LVMPD00001-LVMPD00190 with | | | |
| Privilege Log (Exhibit W to Defendant | | | |
| Valley Health System, LLC d/b/a | | | |
| Centennial Hills Hospital Medical Center's | | | |
| Seventh Supplement to Its Initial Early Case | | | |
| Conference List of Witnesses and | | | |
| Documents dated October 27, 2014) | | | |
| Plaintiff's Exhibit 30 – Excerpts of | XVII | 78 | AA3186- |
| Deposition of Carol Butler dated June 9, | | | AA3201 |
| 2015 | | | |
| Plaintiff's Exhibit 31 – Excerpts of | XVII | 79 | AA3202- |
| Deposition of Renato Sumera, RN dated | | | AA3213 |
| May 1, 2015 | | | |
| Plaintiff's Exhibit 32 – Excerpts of | XVII | 80 | AA3214- |
| Deposition of Margaret Wolfe, RN dated | | | AA3221 |
| May 5, 2015 | | | |
| Plaintiff's Exhibit 33 – Excerpts of | XVII | 81 | AA3222- |
| Deposition of Amy Blasing, MSN, RN | | | AA3246 |
| dated July 28, 2015 | | | |
| Plaintiff's Exhibit 34 – Excerpts of | XVII | 82 | AA3247- |
| Deposition of Christine Murray, RN dated | | | AA3251 |
| January 8, 2015 | | | |
| Plaintiff's Exhibit List from Vault | X | 34 | AA1864- |
| | | | AA1866 |
| Plaintiff's Motion for NRCP 37 Sanctions | III | 12 | AA0407- |
| Against Valley Health System LLC, d/b/a | | | AA0468 |
| Centennial Hills Hospital Medical Center | | | |
| and Universal Health Services, LLC filed | | | |
| April 29, 2015 | | | |

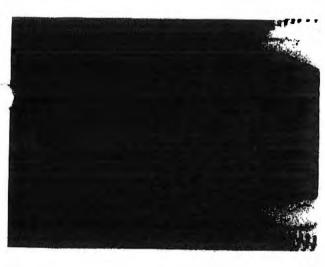
| Document Title: | Volume | Tab | Page Nos.: |
|--|-------------|------|------------|
| | <u>No.:</u> | No.: | |
| Plaintiff's Motion for Summary Judgment | Ι | 4 | AA0022- |
| Re: Liability filed September 29, 2014 | | | AA0093 |
| Plaintiff's Opposition to Defendant's Valley | IX | 26 | AA1590- |
| Health System LLC d/b/a Centennial Hills | | | AA1821 |
| Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Motion for | | | |
| Reconsideration of this Court's November | | | |
| 4, 2015 Order filed December 2, 2015 | | | |
| Reply in Support of Motion for | Х | 28 | AA1825- |
| Reconsideration filed December 4, 2015 | | | AA1838 |
| Reply to Defendant Valley Health System, | III | 15 | AA0490- |
| LLC d/b/a Centennial Hills Hospital | | | AA0565 |
| Medical Center and Universal Health | | | |
| Services, Inc.'s Opposition to Plaintiff's | | | |
| Motion for NRCP 37 Sanctions filed May | | | |
| 21, 2015 | | | |
| Reply to Defendants' Oppositions to | II | 8 | AA0117- |
| Plaintiff's Motion for Summary Judgment | | | AA0343 |
| Re: Liability filed November 21, 2014 | | | |
| Reporter's Transcript of Evidentiary | VI & | 22 | AA0949- |
| Hearing and Motions held on August 28, | VII | | AA1175 |
| 2015 | | | |
| Stipulation and Order for Dismissal with | Х | 31 | AA1848- |
| Prejudice filed February 29, 2016 | | | AA1853 |
| Transcript of Proceedings – Defendant | XVII | 83 | AA3252- |
| Valley Health System LLC d/b/a Centennial | | | AA3305 |
| Hills Hospital Medical Center and Universal | | | |
| Health Services, Inc.'s Motion for | | | |
| Reconsideration of this Court's November | | | |
| 4, 2015 Order | | | |

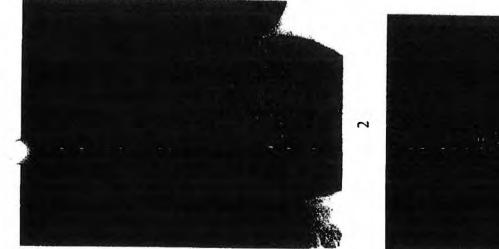
TAB 35 PART TWO

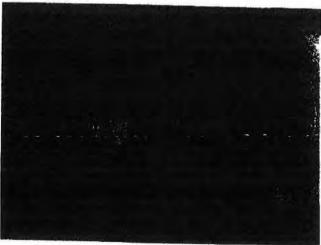
CONFIDENTIAL











s.

9

4



I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

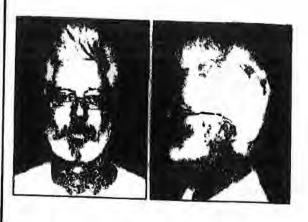
on file with the Las Vegas Metropolitan Police Department. Surgers S. In Curdy Director, Police Records Bureau Records Custodian

Las Vegas Metro Police Department

CONFIDENTIAL 5-16-2008

Booking record for SOUTHWICK, WILLIAM

| Arres | t Information | |
|---------------------------------|---|--------------------------------------|
| 3427009 | CS #: | 2584931 |
| | State ID: | |
| 12-15-2006 | Arrest Time: | 21:30 |
| | Arst Ofcr P#; | |
| L1104 - DRIVIN ALCOHOL - M-0 | NG UNDER THE IN 01045-484.3791-1 | FLUENCE OF 1.14.010 |
| | 3427009 12-15-2006 : L1104 - DRIVI | State ID: 12-15-2006 Arrest Time: |



| Suspect Information | | | Physical Description | | |
|-----------------------|--------------------|------------|----------------------|-----------------------------------|--------------------------|
| Name: | SOUTHWICK, WILLIAM | Sex: | Male | Hair Color: | Gray |
| | | Race: | White | Hair Length: | Short |
| Address; | | Eye Color: | Blue | Hair Style: | Straight |
| Birth Date: SSN #: | 06-02-1958 | Height: | 6'0" | Mustache: Beard: Sideburns: | Mustache Beard Yes |
| Drivers License # | | Weight: | 225 | Complexion: | Light |
| Fivers License # | | Glasses: | No | Build: | Medium |

FOR LAW ENFORCEMENT USE ONLY

Copyright © 2002 All rights reserved. ImageWare Systems, Inc.

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

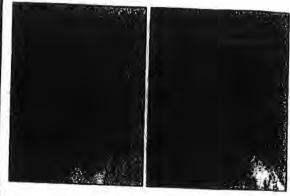
on file with the Las Vegas Metropolitan Police Department. <u>Stutional S. M. Caurdy</u> Director, Police Records Bureau Records Custodian

Las Vegas Metro Police Department

CONFIDENTIAL 05-16-2008

Booking record for DRUMM, DANIEL

| | Arres | t Information | | |
|------------------------|----------------|-----------------|---------|----|
| Transaction Number: | 3442156 | CS #: | 1714630 | |
| FBI#: | | State ID: | | |
| Arrest Date: | 09-17-2007 | Arrest Time: | 14:30 | |
| Arrest Officer | | Arst Ofcr P#: | | 4 |
| Charge: | 02138-200.48 | RY/DOMESTIC VIC | | |
| | Suspect Inform | nation | | P |
| Name: | DR | UMM, DANIEL | Sex: | Ма |
| | | | Race: | Wh |



| Sus | | Physical Description | | | |
|-----------------------|---------------|----------------------|-------|-----------------------------------|--------------------------|
| Name: | DRUMM, DANIEL | Sex: | Male | Hair Color: | Gray |
| Address: | | Race: | White | Hair Length: | Shoulder |
| Autress; | | Eye Color: | Hazel | Hair Style: | Straight |
| Birth Date: SSN #: | 08-10-1953 | Height: | 6'0" | Mustache: Beard: Sideburns: | Mustache Beard Yes |
| Drivers License #: | | Weight: | 210 | Complexion: | Light |
| | | Glasses: | No | Build; | Medium |

• 1

FOR LAW ENFORCEMENT USE ONLY

Copyright © 2002 All rights reserved. ImageWare Systems, Inc.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Survey S. MCCurdy Director, Police Records Bureau Records Custodian

......

Las Vegas Metro Police Department

.

Booking record for MORELLI, RICHARD JOSEPH

| | Arrest Info | rmation | | | | |
|---------------------|---------------|----------------------|------------|--------|---------------------|-------------------|
| Transaction Number: | 2022693 | CS #: | 0190930 | _ | | |
| FBI#: | | State ID: | | | - 1 | |
| Arrest Date: | 10-20-2000 | Arrest Time: | | | | |
| Arrest Officer : | | Arst Ofcr P#: | | | | |
| Charge: | | | | | | |
| Ę. | | | | al and | | |
| Sugnar | t Information | 1.1 | | | | |
| | ORELLI, RICH | Action and the local | Sex: | Male | Hair Color: | Gray |
| | | | Race: | White | Hair Length: | Short |
| Address: | | | Eye Color: | Brown | Hair Style: | Straight |
| Birth Date: 0 | 9-26-1949 | | Height: | 5'10" | Mustache: Beard: | Mustache Beard |
| SSN #: | | | | | Sideburns: | Yes |
| | | | Weight: | 195 | Complexion: | |

Glasses:

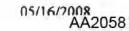
No

Build:

Drivers License #:

FOR LAW ENFORCEMENT USE ONLY

Copyright © 2002 All rights reserved. ImageWare Systems, Inc.



05-16-2008

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the: ORIGINAL-DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

1 in survey

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. McCurdy Director, Police Records Bureau Records Custorlian

Las Vegas Metro Police Department

CONFIDENTIAL

05-16-2008

Booking record for WYNN, JOHN

| | Arrest In | formation | | | | |
|----------------------------------|------------------|-----------------|------------------------|------------------------|---|--|
| Transaction Number: | 3102051 | CS #: | 933195 | - | | |
| FBI#: | | State ID: | | | | |
| Arrest Date: | 12-26-2003 | Arrest Time: | 22:37 | | | |
| Arrest Officer : | GUYER/LVMPD | Arst Ofcr P#: | 7430' | | n she artin | |
| Charge: | 07756- | F BUS SHELTER B | - N. S. S. S. S. S. M. | Rithes. | | |
| | | | | | | |
| s | uspect Informati | on | | Phys | ical Description | |
| LATE ST | | on NN, JOHN | Sex: | Phys Male | ical Description Hair Color: | n Gray |
| Name: | | 10 K 10 K | Sex: Race: | | | |
| LATE ST | | 10 K 10 K | | Male | Hair Color: | Gray |
| Name: Address: Birth Date: | WY | 10 K 10 K | Race: | Male White | Hair Color: Hair Length: | Gray Balding Straight |
| Name: | WY1 02-: | ино, јони | Race: Eye Color: | Male White Hazel | Hair Color: Hair Length: Hair Style; Mustache: Beard: | Gray Balding Straight Mustache Beard |

FOR LAW ENFORCEMENT USE ONLY

Copyright © 2002 All rights reserved, ImageWare Systems, Inc.

LOW DENTLE

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department, Surgeon S. McCurdy Director, Police Records Bureau Records Custodian

| PROPERTY BURE | | | | 2 1 2 01-17-2012 2 10:30:26 AM \$ |
|--|------------------------------|---------------------------------|--|--|
| AC# 08031650 CS# EV# 0805161021 | liem Qiy | 1 | SENUAL ASSAULT KIT CAGNINA, ROXANNE | \$0.00 |
| AC# 08031650 CS# EV# 0805161021 | Qıy | 1A 1 Miscellaneous | DNA EXTRACT JM-111 FROM BREAST SWAB IN S/AKIT OF ROXANNE CAGNINA | |
| AC# 08031650 CS# EV# 0805161021 | Item Qty Type Flags | 1B 1 Miscellaneous | DNA ENTRACT JM -112 FROM THIGH SWAB IN S/AKIT OF ROXANNE CAGNINA | \$0.00 |
| AC# 08031650 CS# EV# 0805161021 | liem Qiy Type Flugs | 1C 1 Miscellaneous | DNA EXTRACT RBQ - 120511-JM2 | \$0.00 |
| AC# 08031765 S# P SV# 0805161021 | Item Qty Type Flags | 5A 1 Miscellaneous | DNA EXTRACT JM -2 FROM BUCCAL SWAB KIT OF STEVEN FARMER Pkg/Itm: 2/5 Sec Bg: 2/5 | \$0.00 |
| AC# 08031765 CS# F 2V# 0805161021 | Item Qiy Type Plags | 5E 1 Miscellaneous | DNA ENTRACT OF RBK - 120711-JM FROM BUCCAL SWAB KIT OF STEVEN FARMER Pkg/lim: 2/5 Sec Bg: 2/5 | 80. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. |
| | | | MONEY TOTAL | \$0.00 |
| RECEIVED FROM EVIDENCE (REASON PROPERTY IN HEING | | EVID BARBARA LAI Lub Request | MOUREUX, FOR (003108) | |
| WASHOEC | BOP IL | | RT, CITIZEN, DISTRICT RECEIPT - RANK: P#: AGENCY: | |

. I I see the ist fully

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTEBIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Survey S. McCurdy Director, Police Records Bureau Records Custodian

LAS VEGAS METROPOLITAN POLICE DEPARTMENT PHOTO LINE-UP WITNESS INSTRUCTIONS

CONFIDENTIAL

| NAME: | | EVENT#: |
|--------------|--|----------------|
| VDDRESS: | • • (=144, mm, 4)) • (a) = 0.0000000000000000000000000000000000 | LOCATION: |
| PHONE NUMBER | ana ang takana ang ang ang ang ang ang ang ang ang | DATE & TIME: |
| | The stand of the s | Drife a finie, |

"In a moment I am going to show you a group of photographs. This group of photographs may or may not contain a picture of the person who committed the crime now being investigated. The fact that the photos are being shown to you should not cause you to believe or guess that the guilty person has been caught. You do not have to identify anyone. It is just as important to free innocent persons from suspicion as it is to identify those who are guilty. Please keep in mind that hair styles, beards, and mustaches are easily changed. Also, photographs do not always depict the true complexion of a person - it may be lighter or darker than shown in the photo. You should pay no attention to any markings or numbers that may appear on the photos. Also, pay no attention to whether the photos are in color or black and white, or any other difference in the type or style of the photographs. You should study only the person shown in each photograph. Please do not talk to anyone other than Police Officers while viewing the photos. You must make up your own mind and not be influenced by other witnesses, if any. When you have completed viewing all the photos, please tell me whether or not you can make an identification. If you can, tell me in your own words how sure you are of your identification. Please do not indicate in any way to other witnesses that you have or have not made an identification. Thank you,"

| | SIGNED: |
|--|--|
| STATEMENT: | DATE & TIME: |
| ······································ | |
| and the second sec | |
| () u + | |
| (a) (b) (a) (b) (b) (b) (b) (b) (b) (b) (b) (b) (b | |
| | |
| an a | |
| | |
| | |
| and a second of the second | |
| | |
| | |
| | SIGNED: |
| | DATE & TIME: |
| OFFICER'S NAME & P#: | |
| WMPD 104 (REV 5-96) - ALITOMATEDAAR12 | and a second |

in all that of the in

hereby certify this is a full, true and correct copy of the. OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

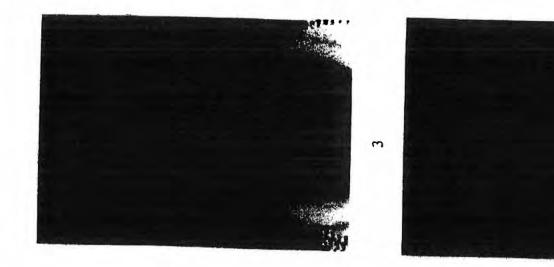
MAY - 8 2013

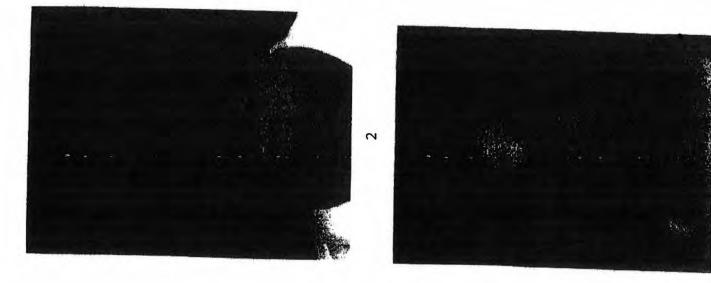
on file with the Las Vegas Metropolitan Police Department Subout S. M. C. Curdy Director, Police Records Bureau Records Custodian

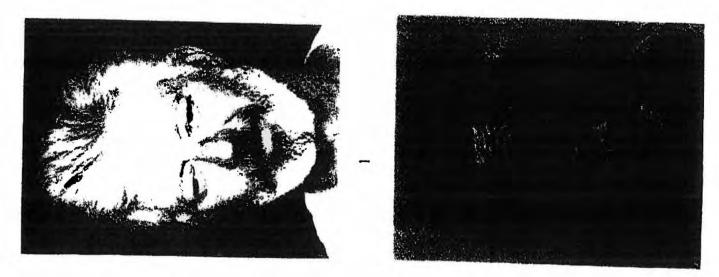
CONFIDENTIAL

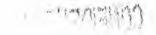
0

5









I hereby certify this is a full, true and correct copy of the: OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Supona S. McCurdy</u> Director, Police Records Bureau Hecords Custodian



FOR USE ONLY AS AUTHORIZED BY DMV

E0046991 DRIVERS LICENSE CLASS1: Non-Commercial C CLASS2.

EXP DATE: 03/16/2009

STEVEN DALE FARMER

PO BX 13 ELDRIDGE CA 95431

HEIGHT: 510 WEIGHT: 210 09/08/2004 09/08/2004 09/08/2004 4224 **TECHNICIAN ID: B7** 03/16/1952 PHOTO SEQ #: PHOTO DATE ISSUE DATE. GRY EYES: BLU APP DATE Σ HAIR DOB. RSTR SEX

APP OFFICE: 634 ISSUE OFFICE: 634 PHOTO OFFICE: 634

TYPE APP:

ENDORS.

٥

DEPARTMENT OF MOTOR VEHICLES

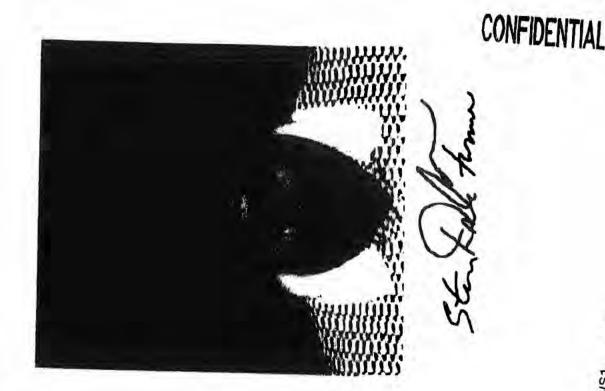
I hereby certify that the document to which this is affixed is a true copy of the records of the Department of Motor Vehicles.

Motor Vehicle File Na

Signed

Date

In accordance with Section 1813 CVC, the above amployee of the Department of Motor Vehicles has been authonized to prepare under seal and certify copies of records of this Department.



Machine: RWS1 05/16/2008 19:28:42 819 ì



I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPX/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Suggno S. McCurdy Director, Police Records Bureau Records Custodian

| A Public Service Agency | | NFORCEMENT | IDENTIFICATION | REQUEST | VERBAL INFORMATIC Birthdate Address |
|-------------------------|-------------------|-------------|-----------------------------------|--------------|---|
| 2 RUSH | Number of Request | s: <u>1</u> | | | Status |
| REASON | INVESTIGATION | | D Pick Up | | DL/iD # |
| TRAK ID # | | | Mail | | Other |
| Red C Yellow | | - | Express Mai | C C | ONFIDENTIAL |
| FAX Only # | | | Courier Name | • | |
| FAX/Mail | | | Account # | | |
| Comments | | | Physical Addres City and State | SS | Zip |
| R9563 | | 2804 | 55N VERI 160 | (702) 828-56 | 1.000 |

| - ST NCY MANE | | | |
|--|---|-------------|--|
| NV LAS VEGAS METR | O PD/SEXUAL ASSAUL | PECEIVEC B. | |
| | SOLADAL ASSAUL | 510 | MVEXW2 |
| GORSKI RUTH | | OA TE. | 10000 C 11000 |
| ADDRISS | Setting and and an an | TIME | 5/16/2008 |
| 400 STEWART | | time | |
| CITY | STATE ZIP | | 10:54 AM |
| LAS VEGAS | NV 89101 - | | and the second s |
| and the second sec | | | |

| CICT NSEND NUMBER | BIRTHDATE | in the second second | | | | | |
|--------------------|------------|----------------------|--------|---------|-----|------------|----------------------|
| E0046991 | 03/16/1952 | Certified | П тр | P/O | Dи | C DL44 | and the Car |
| FARMER STEVEN DALE | | Mug | C Sims | C Other | | | (attach M-8) |
| | | | | CITE D | ATE | COURT DATE | Confidential Address |

•

11



I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/20MPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013 on file with the Las Vegas Metropolitan Police Department Sugara S. MCCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT MEDIA RELEASE

DATE: May 16, 2008

EVENT #: 080516-1021

FOR IMMEDIATE RELEASE

Sergeant Misty Pence The Las Vegas Metropolitan Police Department Crimes Against Youth & Family Bureau Sexual Assault Section (702) 828-3421 or 828-3111

The Las Vegas Metropolitan Police Department is seeking the public's assistance in locating a suspect wanted for questioning in connection with an ongoing sexual assault investigation.

Steven Dale Farmer is a nurse assistant who travels throughout the country to work at various hospitals on a per diem basis. The victim in the case under investigation was a patient at a local hospital where Farmer recently worked.

Farmer is a white male adult, 56 years of age, 5'10" tall, approximately 200 lbs. with grey hair and blue eyes. He was last seen wearing a mustache and a beard. Farmer also uses the last names of "Russnogle" and "Fournier". He was last know to be driving a 1989 Pontiac with California licences plates 5PQC506.

It is believed that Farmer is aware of this investigation and may attempt to alter his appearance by shaving his beard or moustache, or dying his hair.

Anyone with information regarding Farmer's whereabout, his recent stay within the Las Vegas area, or further information concerning his vehicle are urged to call the Las Vegas Metropolitan Police Department's Sexual Assault Unit at 828-3421 during normal business hours or 828-3111 after hours and ask to speak with a Sexual Assault Detective.

LVMPD 227 (Rev. 600) - AUTOMATEOMP12

1 5 a mar & and Anderson 1 3

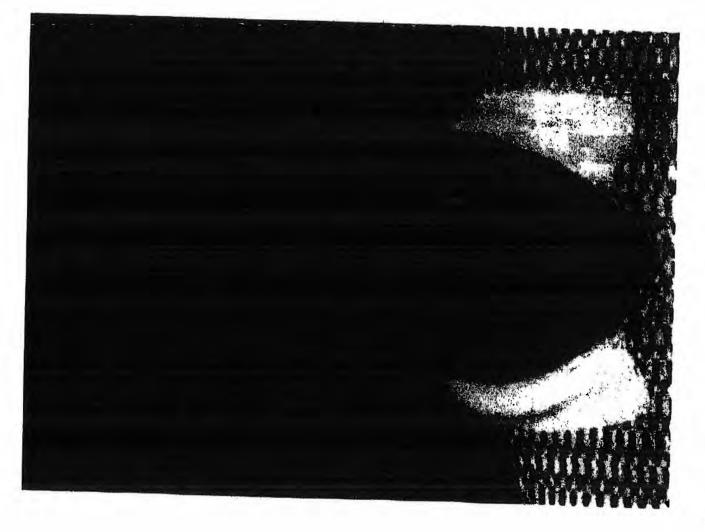
I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPYCOMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. HI Curdy Director, Police Records Bureau Records Custorlian

CONFIDENTIAL

Sizer & Monter



AA2074

-1. ²⁰

I hereby certily this is a full, true and correct copy of the ORIGINAL-DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Subora S. M. C. Curdy Director, Police Records Bureau Records Custodian URIME STUPPERS

NEVADA CRIME STOPPERS

4750 W. OAKEY, LAS VEGAS, NEVADA PH: 702-828-3445 Fax: 702-828-3185 CONFIDENTIAL - DO NOT INCLUDE IN CASE FILE TipSoft Generated Fact Sheet for Law Enforcement Use Only

Report #: 194-6278 Caller #: Client ID: 151

| COL | FINP | 144111 |
|-----|-------|--------|
| LUN | PN/FI | VTIAL |
| | | TIME |

05/17/2008 06:15 AM* RCVD DLVD. 06/17/2008 08:12 AM* Call Taker FT

Pedophile

Las Veges/NV

GENERAL

Data Crime Occurred: Ongoing Location of Crime: Unknown Additional Information about the location of the crime; Unknown Victim: Unknown How is the caller aware of the orime: Caller saw the information on Channel 7 News report Others with knowledge: Unknown How caller heard about Crime Stoppers: Television, Newspaper Danger to Tipster: Low

Caller stated that the suspect was arrested as a sexual predator, caller stated that he was assaulting his patients. Caller stated that they wanted to report that the suspect might have other victims, Caller stated that he gives out business cards to co-workers and patients he acts as a private Santa Claus at Christmas time for kids parties,

SUSPECT No: 1 First: Steven Middle: Unknown Lest: Farmer Full Name: Steven Farmer Allas of Nickname: Unknown Race; White Gender: Male Height: 5'10 Weight: 210Lbs Age: 60 DOB: Unknown Eyes: Unknown Hair: Unknown SSN Unknown SMT's: Unknown Facial Hair: Unknown Clothing: Unknown Address: Unknown City: las Vegas State/Prov: NV Description of Residence: Unknown Res Phone: Unknown Cell Phone: Unknown Prior Criminal History: Unknown Weapons: Unknown Dogs/Animala: Unknown Gang Activity: Unknown Employer/Work Schedule: Certified Nurse Assistant, he works for American Nursing 702. 638-1200

5719 SA

END OF REPORT

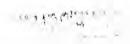
The caller had no further information at this time.

The caller was advised of your status/update schedule and was told to call back if they obtained any further information regarding this tip.

* The times have been adjusted to the redplents time zone.

Report 104-6278

Page 1 of 1



I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Suppose S. McCurdy Director, Police Records Bureau Records Custodian

PAGE 1

CONFIDENTIAL

EVENT #080516-1021

TIME OCCURRED:

SPECIFIC CRIME: SEXUAL ASSAULT, OPEN AND GROSS LEWDNESS

DATE OCCURRED: May 16, 2008

LOCATION OF OCCURRENCE: 6900 North Durango Drive

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: STEVEN FARMER

| DOB: | 3-16-1952 | SOCIAL SECURITY #: | |
|-------------------|--|-----------------------|-------------------------|
| RACE: | | SEX: | |
| HEIGHT: | | WEIGHT: | |
| HAIR: | | EYES: | |
| WORK SCHEDULE: | | DAYS OFF: | |
| E | 1841 Leonard Las Vegas, Nevada, 89108 | HOME PHONE: | cell phone 707 332-5894 |
| WORK ADDRESS: | | WORK PHONE: | |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE C. JEX, P#, LVMPD SEXUAL ASSAULT AND ABUSE SECTION, on May 16th, 2008,

at 2205 hours.

Operator, this is Detective C. Jex, P Number 5597. I=II be conducting one interview

reference Event Number 080516-1021. The, uh, location of the interview is 4750 West

Oakey. Person being interviewed is Steven, S-t-e-v-e-n Farmer, F-a-r-m-e-r. Date of

- MAS 3 Provide and a second sec

.

.

.

.

.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Suppose</u> S. <u>McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: STEVEN FARMER

birth of 3-16-1952. His address is 1841 Leonard, Las Vegas, Nevada. His cell phone number is 707-332-5894. Also present is Sergeant M. Pence, P-e-n-c-e, P Number 4950. Today=s date=s 5-16-2008. The starting time is 2205.

- Q. All right. _____, just a couple things I wanna make sure that I=ve got. Your date of birth of 3-16 of 1952?
- A. Yes, sir.
- Q. That=s correct?
- Α.____.
- Q. Okay. And it=s S-t-e-v-e-n, Farmer?
- A. Yes, sir.
- Q. Uh, do you have a middle name?
- A. Dale.
- Q. Dale. D B
- A. a-l-e.
- Q. Dale. And F-a-r-m-e-r?
- A. Yes, sir.
- Q. And the address, 80 B er 1841 Leonard?
- A. Yes, sir.
- Q. Okay. What B do you know what the ZIP code is there?
- A. 89108.

.

.

.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunova S. McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: STEVEN FARMER

9108. And your Social Security Number? Q. Α. Q. Α. Q. Α. Q. Α. Q. And your cell, 707 332-5894? Α. _____. (inaudible) Q. I=m sorry? Α. Yes. Q. That=s correct? Α. _____В Okay. All right. All right. Because of the B because of the investigation, the Q. allegations, everything, I=m B I=m going to read you your Miranda Rights. Okay?

A. Okay.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Sugar S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: STEVEN FARMER

- Q. You have the right to remain silent. Anything you say can be used against in a court of law. You have the right to the presence of an attorney. If you cannot afford a per B attorney, one will be appointed before questioning. Do you understand these rights?
- A. Yeah.
- Q. Okay. All right. What I B what B what I need from you, Steve, is B is there=s B there=s been an allegation made B
- Α.____.
- Q. Um, that=s come from where you work.
- A. Um-hum.
- Q. And, uh Buh, some B an incident that took place, uh, earlier this morning, late last

night B I=m not exactly sure when B while you were at work. Okay. You know anything about that? You been notified of anything like that?

A. What do I have to do to get an attorney?

(BY SERGEANT PENCE:)

- Q. What B I=m sorry. What was the question?
- A. I want to get an attorney.
 - (BY DETECTIVE JEX:)
- Q. _____. So, you don=t wanna talk to me B

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunova S. McCurdy</u> Director, Police Records Bureau Records Custorlian

AA2085

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

- A. ______ before I answer anything, I want an attorney.
- Q. Okay. All right.

.....t

Operator, end of interview. Time is 2209.

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY,COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Subman</u> S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 4750 W. OAKEY ON THE 16th DAY OF MAY, 2008, AT 2209 HOURS.

CJ:tp

COMPOLATION

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Surgeon S. McCurdy</u> Director, Police Records Bureau Records Custodian

AA2089

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT VOLUNTARY STATEMENT PAGE 1

EVENT #080516-1021

SPECIFIC CRIME: Sexual Assault, Open and Gross Lewdness

DATE OCCURRED: May 16, 2008

TIME OCCURRED:

LOCATION OF OCCURRENCE: 6900 North Durango Drive

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: ROXANNE CAGNINA

| DOB: | 7-6-1973 | SOCIAL SECURITY #: | |
|-------------------|---|-----------------------|--------------|
| RACE: | | SEX: | |
| HEIGHT: | | WEIGHT: | |
| HAIR: | | EYES: | |
| WORK SCHEDULE: | | DAYS OFF: | |
| HOME ADDRESS: | 3717 Lower Saxon Avenue North Las Vegas, Nevada, 89085 | HOME PHONE: | 702 870-5435 |
| WORK ADDRESS: | | WORK PHONE: | |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE M. SAUNDERS, P#6076, LVMPD SEXUAL ASSAULT SECTION, on May 16th, 2008, at 1045 hours.

Hello, Operator, this is Detective M. Saunders, S-a-u-n-d-e-r-s, conducting one taped interview reference Event Number 080516-1021. Uh, this interview=s taking place at

6900 North Durango, Las Vegas, Nevada, uh, at the Centennial Hills Hospital, Room 725.

Present for this interview, also, is going to be Sergeant M. Pence, P-e-n-c-e, P Number

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY, COMPUTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Suppose</u> S. <u>MCCurdy</u> Director, Police Records Bureau Records Custorian

AA2091

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA 4950. Interview=s taking place on the 16th of May, 2008, at approximately 1045 hours. Um, person being interviewed, last name is Cagnina, C-a-g-n-I-Ba, first name of Roxanne. Date a birth of, uh, 7-6 of >73, Social Uh, address of seven B I=m sorry, 3717 Lower Saxon Avenue, North Las Vegas, Nevada, 89085. Has a home number of 870-5435.

- Q. Roxanne, is that information I just read to you correct?
- A. Yes.
- Q. Okay. Uh, Roxanne, we=re here to investigate eh B the allegations that were B were brought up about a B a nurse that was assisting you this morning. Um, from your best recollection, starting with what you remember first B uh, whether comin= out a the ER, whatever it may be, can you tell us the details of what had occurred?
- A. He was transporting me to my room, and it was B I think it was around three o=clock.

And we got into the elevator, and he kept adjusting my blanket.

- Q. Okay. Explain B what do you mean he was just B uh, adjusting your blankets.
- A. He just kept making sure I was covered and.

Q. Okay.

A. He had plenty a time underneath my cover. I noticed he was rubbin=, like B like,
 goin= like this on my leg.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD CORV/COMPDTERIZED/MCROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Surrana S. M. C. Curdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. On the top a your thigh, closer to your groin or more towards the B
- A. Um, more B
- Q. B middle a your thigh B
- A. B to the goin.
- Q. Okay.
- A. And I kind a felt uncomfortable, so I kind a pulled it down.
- Q. Okay. Was there anybody else in the elevator with you?
- A. There was another lady in the elevator. Um, I don=t know who.
- Q. Did she B would it B could she see what he was doing?
- A. I don=t think so. I B
- Q. Was she _____ (inaudible) B
- A. I B I had a lot a covers on me, >cause I had, um, two heated blankets and then my original blanket.
- Q. Okay. So, he had his hand underneath the blankets?
- A. Underneath and I B
- Q. Okay B
- A. I think I was sittin= like this, and B
- Q. Okay. So, you had your knees propped?
- A. Yeah, I had my knees propped. If I=m not mistaken B



I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MCROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunona S. McCurdy</u> Director, Police Records Bureau Records Custodian

AA2095

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum B
- A. B and then he kept B he kept rubbin= underneath my thigh.
- Q. Um-hum.
- A. And he was gettin= closer and closer. And I B
- Q. Closer to what?
- A. To B to my groin area.
- Q. Okay,
- A. And I didn=t have underwear on. So B
- Q. What were you wearing?
- A. I was just wearin= my robe, my B
- Q. The hospital robe that B
- A. Right B
- Q. B they gave you? Okay.
- A. So, I kind a pushed my robe down and B in the hopes that he would get the B the hint that I was very uncomfortable with that.
- Q. Okay. Did you say anything to him about moving his hands or direct anything to the other B
- A. Not B
- Q. B nurse?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUZERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> S. <u>McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Not at that time.
- Q. Not at the time. Okay.
- A. So, we got in the room, um B um, no one was in here but him and I.
- Q. Okay.
- A. And B
- Q. Hold on real quick. When you were gettin= off the elevator, where=d the other nurse go?
- A. I think she went the opposite direction.
- Q. Okay. So, she probably went down towards the nurse=s station, and he was the only one that brought you in the room?

Α.____.

- Q. Okay. Do you know what time it was you got to the room, by chance?
- A. I would guess that, like, it was around three o=clock.
- Q. It was three-ish. Okay.
- A. Yeah.
- Q. All right. Please continue.
- A. Um, so, um, (inaudible voice present in background) he got me in bed, and he started rubbin= me, started rubbin= my shoulders. And I go, that=s not necessary or somethin= like that. And he goes, oh, AI=m just tryin= to relax you.@ And he
 - actually _____B

AA2098

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Success S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

he actually stated the time to me. He goes, Alt=s three o=clock. You should be sleepin=,@

He goes, Al=m doin= this to relax you. And I just kind a looked at him. And he kind a, like, had this look on his eyes, like B like a scary look, kind a, like, you know B kind a B

he kind a feared me B I kind a feared him. I=m sorry.

- Q. You kind a what? I=m sorry B
- A. I B I was afraid of him.
- Q. Okay.
- A. At that point. So B so, as he got me adjusted B and he goes, AWell, let=s pull out your B your gown from underneath you, >cause it=s harder to turn and twist.@ So, I said, AOkay.@ So, it=s covered, and he pulled it out. And then that=s when he started to rub the inside a my thigh. And I crossed my legs, like this. And I go, AYou don=t have to do that.@ And he goes, no, it=s just B and he goes, Alt=s just to relax you. It=s procedure, and it=s okay. Don=t worry I=m not gonna hurt you.@ I go, ANo need. It=s all right B
- Q. And B and he said it was procedure?
- A. Yeah. He said, Alt=s procedure.@
- Q. Okay.

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Suppose S. M. - Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. And B and then, um, he started rubbin= my face and to the side a me and tellin= me how beautiful I was. And then I B I got this knot in my gauze like this B I couldn=t reach my call button, because it was still up there. So, I got this horrible knot, and I noticed I had my phone under here.
- Q. _____
- A. So, at one time I reached underneath, and I had gotten my phone, and I was trying not to let him hear that B the clicking sound.
- Q. Um-hum.
- A. And I started clicking a couple shots, but I couldn=t hear him, so, I figured, maybe, he can hear him.
- Q. Um-hum.
- A. So, then, he proceeded goin= B to goin down my legs and inside the inner thigh and then start to penetrate me. And B and that=s when I told him, APlease stop.
 Please stop.@ He goes, Alf you just relax, it=ll help you go to sleep.@
- Q. Okay.
- A. He goes, AJust relax. It=II help you go to sleep.@
- Q. Okay.
- A. And, at that point, I just froze.
- Q. Okay. When, um B which hand did he use?

n an an an ann an A Ann an Ann an

0011-00

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. $\underline{Su_{4000}} \underline{S}, \underline{M} \underline{\leftarrow} \underline{Curdy} \\ \underline{Director, Police Records Bureau} \quad Records Custodian$

AA2103

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Um, I wanna say he used both. My legs B I wanna say he used both.
- Q. Okay.

A. And then at one point, he told me, just go ahead and put your hands up like this or somethin= like that.

- Q. He wanted you to lif B put your arms buh B
- A. Yeah. He goes, put B
- Q. B you hand behind your neck?
- A. He goes, APull your hair behind your B your neck.@ He goes, AAnd just relax.@
 He said, AJust relax.@ He ______B
- Q. So, in the position that your in right now, arms B
- A. Yeah B
- Q. Arms above your head and hair B
- A. Um-hum B
- Q. B pulled up. Okay. Did you do that?
- A. I did that.
- Q. M=kay.

A. I _____B I, like, it _____I very afraid.

Q. Um-hum.

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. And then he proceeded to ______B to rub my face, and I then I took his hands off a my face. And he goes, ANo, no.@ He goes, Alt=s to relax you.@ And he kept B he kept massaging my face.
- Q. So, he used the back of his hands?
- A. Yeah. ______ B at one point, he used the back of his hands. And then he went underneath my gown. And he started tellin= me that I had beautiful breasts.
 And I B I kept B
- Q. And is he B is he touching your breasts at this point?
- A. Um-hum. He was touching both of >em. I kept pullin = my blanket up. And he goes, don=t be B AThere=s nothin= to be ashamed of. There=s nothin= to be ashamed of. You have beautiful breasts.@ And I just B I just kept B I believe stayed in this position.
- Q. M=kay. You B you pulled the B you pulled the B the blanket up to your neck?
- A. Um-hum B
- Q. Uh, is his hands B
- A. ____had B
- Q. B over the top of the blanket or underneath the blanket?
- A. No. They under here the whole time.
- Q. They were underneath the blanket?

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Unless he was touchin= my face.
- Q. M=kay. And then wuh B was B was his B were B were his hands also underneath

your robe, touching your breasts?

- A. Yeah. He was _____ B
- Q. So, it was skin-to-skin contact B
- A. Hmm B
- Q. B is what I=m asking?
- A. He was penetratin= me.
- Q. Okay,
- A. He B
- Q. All right B
- A. He ______ B penetrate me _____. At that point, I just B I just, like,

totally grabbed my camera, and I kept tryin= to take pictures. I just, you know,

snap, snap, snap, snap.

- Q. You were tryin= to take pictures of him?
- A. Yeah, I was tryin= to take pictures of him.
- Q. Do you still have that phone?

n Standard (Standard) Maria

- A. I do.
- Q. Did any a the pictures come out?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Suggad S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA

- A. No, they didn=t come out.
- Q. Okay.
- A. I had no flash.
- Q. Okay. But it=II show a time and date, right?
- A. Um-hum.
- Q. Okay. Um, so, when um B uh, I wanna verify something really quick. Um, so, he first started rubbing your thigh, then he started rubbing your face. And the he said he needed to move the robe, it would be more comfortable for you. Is that correct?
- A. _____ He said that to me, AHere, _____ so you=II be more comfortable when you=re sleepin.@
- Q. Okay. I know it=s hard. And I=m B and I=m sorry to ask, but I just to make sure.
 Okay. Um, at that point, he started rubbing your thigh. And is that the first time he used his fingers to penetrate your vagina? Did he penetrate your vagina first, or did he rub your breasts first?
- A. He B he rubbed my breasts first.
- Q. Okay. So, he rubbed your breasts, then he went down and B and penetrated your vagina with B you said, both hands, usin=?
- A. Both hands and _____ both fingers.

(MARDENTAL)

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Subone S. M. Gurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. M=kay. And then he went back up and started doing what?
- A. And then he went right _____ he started touchin= me. Uh, he started

touchin= my face.

- Q. And that=s when you pushed his hands away?
- A. Hmm, I pushed his hands away.
- Q. And is that B
- A. And B
- Q. Is that when he told you to raise your hands up?
- A. Yeah. He goes B
- Q. Okay B
- A. B ALift up your hair.@ B
- Q. M=kay B
- A. My hair was top. He was liftin= my head up. He goes, AYou=II be more comfortable if you just leave your hands up there.@
- Q. M=kay. And then ...
- A. Um, and then he continued to go down there.
- Q. Okay. And he went back down there. Okay.
- A. Uh-huh. And he continued to penetrate me. And then, at one point and time, he
 B he went down there, literally, and started using his tongue.



I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/ROMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugan S. 1996 Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Okay. Well, after this, uh B after he used his hand the second time, did he go back up to your breasts first and then?
- A. I don=t think so.
- Q. You don=t B oh, okay.
- A. _____.
- Q. So, then you said he went down there, and he B he actually used his B he put his

face B

- A. Yeah. He _____B
- Q. And B and his tongue on your vagina?
- A. He kept lickin= me all _____.
- Q. Okay. Was the door open or closed when this was happening?
- A. It was closed.
- Q. Okay. And did he B was he B what is saying to you why he has his face down

there?

- A. Nothing. He _____ B
- Q. Is there B in B do you remember?
- A. He just kept tellin= me, ARelax. It=s gonna help you sleep. It=s gonna help you sleep.@

Q. M=kay.

IN MANY WO

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY,COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Survey S. McCurdy Director, Police Records Bureau Aecords Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. He was just ______ you need to go to sleep. You need get to get some rest.
- Q. Did he B uh, was he aware a what medication that you were on?
- A. Yes, he was. He ______ B he was B he _____, um, all the

medication you have in your system.

- Q. Um-hum.
- A. He said, AYou should be asleep by now.@
- Q. Okay. Did B was he the assisting nurse in anything done in the ER Room
- Α.____.

Q. Okay. Um, did you ever tell him no or stop?

- A. Yes, I did.
- Q. At which point?
- A. The first time he touched me.
- Q. The first time he touched you.
- А. _____В
- Q. Is this before the penetration B
- A. I was _____ B
- Q. Is this before the pene B

JAN WEINING

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COP(//COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Suggad S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT VOLUNTARY STATEMENT PAGE 15

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Before the elevator, I told him, APlease stop. Please stop.@ And I crossed my legs. Uh, I saw B I crossed my legs on many occasions.
- Q. M=kay. When B when B when did you B
- A. And he pulled them apart B
- Q. When did you ask him to please stop, at what point? I=m sorry.
- A. Several times.
- Q. Several B I ______ B several times after the elevator, after you got in the room?
- A. Um, after the elevator.
- Q. After the elevator. Okay. M=kay. And then what would he say when you=d tell him to stop?
- A. Uh, he goes, ANo. Just relax. Relax. It=s gonna help you sleep.@
- Q. Okay.
- A. AJust relax. Just relax. It=s gonna help you sleep.@
- Q. Okay.
- A. And then he said, um, AI=m gonna back, and I wanna make sure that you=re doin= okay tomorrow.@ He goes, AI=m gonna come back.@ This the end B I don=t know if it was at the end, but he said at the end, then he goes, AI>m gonna back at

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/DACROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Sultana S. M.-Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

PAGE 16

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

seven o=clock in the morning to make sure that you=re okay. And I B I found

that kind a odd. So, I B I _____. I woke up B I don=t think I slept at all.

- Q. M=kay. At what B
- A. IB
- Q. Okay B
- A. And, like, ______B
- Q. Do you know what B
- А. _____в
- Q. B time it was that he left? The room?
- A. It was _____15 minutes.
- Q. It was about 15 B so, he was in the room with you about 15 B all this occurred over a period of about 15 minutes?
- A. Hmm.
- Q. Okay. Eh B okay. So, what B what happened after he left?
- A. Well, after he left, um, nothing. I B I kept trying B I B I B I kept try B I tried to call home.
- Q. On your cell phone?

- A. Um, on B on the regular phone, >cause my batteries went dead. And then after
- that, um, I kept tryin= not to fall asleep, but I had so much medication in me.

MMAGHOV

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Subova</u> S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum. Did you finally fall B
- A. That B
- Q. B asleep?
- A. I fall B
- Q. _____B
- A. I think I fell asleep and then B
- Q. Did you actually B were you able to actually call out on the room phone?
- Α. _____.
- Q. No? Okay.
- A. No. But first thing in the morning, I called my husband B
- Q. _____ B
- B I think. It must a been six thirty, and I told him. I said, ACan you get here before seven?
 And I don=t know if I went through to detail with him.
- Q. Okay.
- A. At seven B I said, AI need you here at seven.
 I believe I B I told him what was goin= on.
 - Um, and then as soon as the nurse came in, my nurse B
- Q. _____B
- A. | asked for the nurse that was in charge.

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sunon S. M. Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum.
- A. I said, ACan I please speak to the nurse in charge?@
- Q. Um-hum.
- A. The main nurse. And she=s, like, _____B
- Q. And what time was that at when this other nurse came in?
- A. Um B
- Q. Had you called your husband B
- A. B they both met here at the same time. It was seven o=clock.
- Q. It was a B roughly, seven o=clock?
- A. Um-hum B
- Q. Okay,
- A. >Cause B well, at seven, seven-twenty. >Cause I was surprised to see him back here.
- Q. I=m sorry.
- A. And then I called 9-1-1. And I didn=t know what to tell >em, so hung B
- Q. Um-hum B
- A. Bup.
- Q. Okay. Then B and then you called 9-1-1?
- Α.



I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY COMPUTERIZED/MICROGRAPHIC COPY)

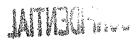
MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Submar</u> S. M. C. Curdy Director, Police Records Bureau Records Custorlian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA

- Q. Eh B
- A. I called 9-1-1 B
- Q. Um-hum. On your cell or from your room phone?
- A. On my cell.
- Q. Okay. Um, when he came back to the room, did he say anything?
- A. Him and the nurse B he walked in, and then the nurse walked in after him. And the nurse was being kind a suspicious. And she goes, are you B
- Q. Is it the nurse that=s working right now?
- A. Uh-huh. She goes, AAre you her husband?@ And he goes, ANo, I was her@ B
 her B her Anurse downstairs.@
- Q. Um-hum.
- A. He goes, Al was just comin= up here to check on her.
 And she kind a had this look. And I kind a looked at her, kind a like B
- Q. Did you say anything to her at that time?
- A. He looked at me, and I B and I don=t remember if I said anything. He just kept glarin= at me. And B
- Q. Explain glaring. What do you mean by he was glaring at you?
- A. Glarin= in a way that I B that I=d be afraid.
- Q. Okay. Making, uh B a threatening manner?



I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Support</u> S. McCurdy Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA

- Α.____.
- Q. Okay. Like, what do you B what do you think he was implying by glaring at you?
- A. Just, like, shut your mouth or something like that.
- Q. Okay. Did you tell this nurse that showed up in your room what happened, or did she get the head nurse like you asked?
- A. No. I asked her to get the head nurse.
- Q. Okay. And then the head nurse came in?
- Α._____-
- Q. Was that, uh, Vickie? (phonetic)
- A. I believe so.
- Q. M=kay. And then you told her what had occurred?
- A. Hmm.
- Q. Okay. Um, at what time did your husband get here?
- A. Um, shortly after he _____. He had to drop the kids off. He B he had

_____BIdon=t_____comes on. Um, _____

- Q. Okay.
- A. And I said, ABut he=s working downstairs,@ and he just, AWell, if he shows up,@ then B
- Q. Um-hum B
- A. AThen push the button.@



I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> <u>S. M. - Curdy</u> Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. M=kay.
- A. But I didn=t have B reach _____B
- Q. _____ B
- A. So.
- Q. I understand. How many individual times B that B would he start and stop B how many times did he touch your breasts?
- A. _____ last time?
- Q. Uh B okay. I mean, like B
- A. He B maybe, like, ten or fifteen.
- Q. Okay. What B what I mean by that is if he B if he went underneath your top B or even on the outside a your top, if he started feeling your breasts, if he stopped and then

went B started rubbing your hair, and then went back to rubbing your breasts and then tried to touch you between your legs, and he went back to rubbing your breast. How many times do you think that he actually, individually B

- A. You mean, like here B
- Q. How B
- A. B and then B
- Q. B separate times B

MURAN

I hereby certify this is a full, true and correct copy of the OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Silubana S. M. C. Curdy Director, Police Records Bureau Records Custorian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. B here B
- Q. Yes. If he B if he went B
- A. Here and B
- Q. B from your breasts to yourB yeah, whatever it was?
- A. Probably about thirty times.
- Q. About 30. M=kay. And how many times did he use his hands to start and stop penetrating that you think?
- A. When he=s ______ hands. He kept tellin= me that he had big fingers. It was B AWhat I wanna do is make you come.@
- Q. Did he say this while he was usin= his fingers, or while he put his face down there?
- A. While he was usin= his fingers.
- Q. Do you recall B do you remem B do you feel like he was using both hands, or could you only feel one hand?
- A. No. I feel it was with one hand.
- Q. You only feel one hand. Okay. And, um, how many times would you say B
- A. This was _____.
- Q. Um-hum. (Inaudible voice present in background)
- A. Like, about nine times.

LATN30FM00

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Support</u> S. McCurdy Director, Police Records Bureau Records Custodian

NFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. About nine times. Okay. What about with his face? How long B how long was he B

did B do you think performed orally on you for?

- A. About five.
- Q. For about five minutes, you think?
- A. Um, no, about five different times.
- Q. Oh, he went down B Okay, about five times. Okay. So, what did he B would he go down and then stop and come up, and then go back down, and then stop and come up, and then go back B or was it just, he would stop briefly and then go back?
- A. He was B after he was all finished here B
- Q. Um-hum B
- A. B _____ that=s when he went down there.
- Q. And he just stayed down there?
- A. Um-hum.
- Q. Okay. Um, okay. Did he make any other B any B it B now, you B there was information, something about a phone number. What B what, uh B what occurred with a phone number?
- A. Well, downstairs, they were B they were wonderful to me.
- Q. Um-hum.

CONFIDENTAL

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Supporta S. McCurdy Director, Police Records Bureau Records Custodian



EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. And then the female nurse B um, you can ask them. I said, can you please give

me a phone number B and your B I need B I don=t even think I asked,

uh, for a phone numbers. I said, ACan you give me your information?

I=d like to@ ruh B write a ruh B

Awrite a letter@ and Ato the corporation@ um, Ato let them know@ that Ahow great

you guys have been.@ >Cause down there, he was very professional.

- Q. Um-hum.
- A. You know, but then I was in a surrounding.
- Q. Right. So, did he give you his phone number?
- A. He _____.
- Q. Okay. Did you get the phone number from the other nurse?
- A. Um, I believe so.
- Q. Okay. Don=t B don=t worry about it right B we B we can B we can verify that later.

I=ve some B _____ B

- A. Um, I believe so.
- Q. Okay.
- A. Um, yeah.
- Q. Okay. Have you ever met him before?

A. No.

Q. Never seen him before? Okay.

JAN MAN MIN

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department $\underline{Suppona} \ S. \ McCurdy$ Director, Police Records Bureau Aecords Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Um-um.
- Q. And, uh, when was the last time you and your husband were sexually active? Has it been in the last 72 hours?
- A. Um, yes.
- Q. Okay. About how long ago was that?
- A. Hmm, probably a week ago.
- Q. A week ago. Okay. So, it was longer than 72 hours, longer than three days ago?
- A. Yeah.
- Q. Okay. Um, would we have any occasion to find any other male DNA or anything on you other than your husband=s? Or maybe this guy B
- A. _____ find saliva.
- Q. You=II think B suhl B okay. And, wuh B will you allow us to have a B a SANE exam done on you? Have a certified nurse come and try to collect evidence?
- Α.____.
- Q. At any time did he put his penis in you?
- A. No.
- Q. Anything like that? Okay. Did he ever rub his penis anywhere on your body?
- Α.____.
- Q. No. Did he lay on top of you or kiss you?
- A. No. No. He was really _____ about the other nurse comin= in.

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the. OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department. $\underbrace{Su_{AAA} S. + McCurdy}_{\text{Director, Police Records Bureau}} \text{ Records Custodian}$



EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Okay. And while he was doin= B what side of the bed was he standing on?
- A. This side.
- Q. He was standin= right there?
- Α. ____.
- Q. Okay.
- A. Hmm.
- Q. And the whole time, his hands were underneath the blankets, hmm, and everything?
- Α.____.
- Q. Okay. Are these the same blankets?
- A. Um-hum.
- Q. These are the same blankets?
- A. Hmm.
- Q. Okay.
- A. They haven=t B
- Q. An B
- A. B changed,
- Q. And yours B did B do you remember him B did he ever wipe his hands on anything, any blankets, your B your robe or anything?
- A. Um B

JAITH BURNING

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Surgan S. M. C. Widy Director, Police Records Bureau Records Custodiar

CONFIDENTIAL LAS VEGAS METROPOLITAN POLICE DEPARTMENT **VOLUNTARY STATEMENT**

PAGE 27

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Did he was his hands in the sink, did he do anything like that?
- A. I don=t _____.
- Q. Okay. And the last time you saw him was seven o=clock this morning, and then he B after he said he was just comin= to check on you, he up and left and B
- A. That=s ______ he seen the nurse, he was just, like, _____ B
- Q. All right. Okay.

Sgt. Pence, do you have any questions?

MP: Uh, I have just a couple a questions.

(BY SERGEANT PENCE:)

- Q. Just for clarification purposes, um B I know Detective Saunders asked you, but I want to be positive on your answer. Did he touch your breasts over or under your clothes?
- A. Underneath.
- Q. Okay. And what position was your bed in this whole time?
- A. Um, I think that it was, probably the way it is now.
- Q. So, your head was inclined a little bit?
- A. Hmm B maybe, a little bit down, >cause I was tryin= to go to sleep.

(BY DETECTIVE SAUNDERS:)

- Q. You had a slight incline?
- A. Yeah. It=s, like, a little bit more down.

I hereby certify this is a full, true and correct copy of the: OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunona</u> <u>S</u> <u>MCCurdy</u> Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

(BY SERGEANT PENCE:)

- Q. Okay. And, um, he didn=t kiss anywhere else on your body?
- A. No.
- Q. Okay. Did he penetrate anywhere else on your body other than your vagina?
- A. No.
- Q. No. Okay. Um, how did he B how did give you his phone number?
- A. Downstairs, the nurse B there was a female nurse B
- Q. Um-hum,
- A. B and there was him. And I kept tellin= her over an over B >cause I think she was my head nurse. And I kept tellin= her B her and him. I said, AYou guys are great.
 I hate to bother you guys, but I=m gonna write a letter of recommendation.@
- Q. _____B
- A. You know, tellin= how great you guys are. So, if you guys can give me your information, I=d love to do that for you.

¢

- Q. Okay.
- A. I said, AI really do appreciate how well you guys are taking care of me.@
- Q. Okay.
- A. So, that=s how _____B

(BY DETECTIVE SAUNDERS:)

MM

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Supara S. McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021 STATEMENT OF: ROXANNE CAGNINA

- Q. Now, was she the one B
- MP: How B
- MS: I=m sorry, Sergeant Pence B

(BY SERGEANT PENCE:)

- Q. How did he give it to you, though. I mean you=re B I know you=re B you told him and the other nurse you wanted their information. Did he tell it to you verbally, and you wrote it down? Did he write it down? How did B how did you get his information?
- A. Um, I had my purse here at the here at the B at the whole time.
- Q. Uh-huh.
- A. And that=s B I pulled out somethin=, and I handed it to him.
- Q. Do you know what it was you pulled out?
- A. Yeah.
- Q. What was it?
- A. I pulled out my check book.

- Q. Okay. And you asked him to put his information in the checkbook?
- A. Yeah. But I noticed, after looking at it, he didn=t put his name on it.
- Q. Okay. Did you tell him what information you wanted?

JAINAU MOV

I hereby certify this is a full, true and correct copy of the: DRIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugara S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

| | STATEMENT OF: ROXANNE CAGNINA | | |
|-----|--|--|--|
| Α. | l just said, well, I=d like your B you B you nuh B down I=d like | | |
| | your | | |
| | name, information, stuff, so I can write a letter of recommendation, which I would | | |
| | assume, name, number, nurse. Not even number, really, I would just assume. | | |
| | B | | |
| Q. | Then you also told this to the other female nurse? | | |
| A. | Several times, I her. | | |
| Q. | Did you ever get her information? | | |
| A. | Um, I believe so. | | |
| Q. | Do you know where you got B where her information is? | | |
| A. | Um, if I look through my purse, I can probably B | | |
| Q. | That=s okay. | | |
| MS: | B | | |
| | (BY SERGEANT PENCE:) | | |
| Q. | We=II do that later. I just didn=t know if you knew off hand. | | |
| MS: | Wuh B was this B | | |
| | (BY SERGEANT PENCE:) | | |
| Q. | Just hold off on that. We=II B we=II get it later. | | |
| A, | Um, if you find the nurse he was working with and ask her B | | |

Α,

4

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPOTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department <u>Support</u> S. <u>INCCUT</u> <u>Director</u>, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum.
- A. Um, she remember, >cause I kept askin= her several, several times.
- Q. Okay. Did you B eh, did you ever hand her the same thing you handed him to get her information?
- A. No.
- Q. Okay.
- A. I think, um B if I=m not mistaken, she wrote it on a separate piece of paper.
- Q. And it B the nurse that was working with him downstairs, is that the same nurse that helped transport you up here to this room?
- A. No.
- Q. A different one?
- A. Yeah. She was my B I believe she was my head nurse, and he was a back nurse.
- Q. She, being the one you asked for the information?
- Α.____.
- Q. Okay.
- A. And she was B she was the back-up B he was the back-up nurse, and she was the nurse that was assigned to me.

(BY DETECTIVE SAUNDERS:)

- Q. _____. Who was the nurse that went upstairs with you and B
- A. He was.

MINAUFINU

I hereby certify this is a full, true and correct copy of the OBIGINAL DOCUMENT (HARD COPYCOMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Surran S. McCurdy Director, Police Records Bureau Records Custodian

÷

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. And then who B who was the other nurse that was B
- A. I don=t know B
- Q. She was just B
- A. I _____ B
- Q. B another nurse in the ER B
- A. B she was a nurse.
- Q. Okay. All right.

(BY SERGEANT PENCE:)

- Q. Now, do you know his name?
- A. Um, if I=m not mistaken, it=s John. (phonetic)
- Q. And why do you think it=s John?
- A. Um, because I asked. I asked down there. I go, what B wuh B what B AWhat was your name?@ Like that. And >cause I kept callin= him _____
- Q. Okay.
- A. And he goes, AWhy are you callin= me _____.@ And _____ I don=t know, you look like a B you like a Scott. Maybe it=s >cause I used to call my husband ______. >Cause he goes, no, it=s John, and he said it laughing. I go, John, it=s not funny. >Cause I was bein= very friendly down there.
- Q. Um-hum.

AA2150

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department <u>Suppose</u> <u>S. M. Curdy</u> Director, Police Records Bureau Records Custorlian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. You know. I go talk friendly >cause you probably don=t even know my name.
 And he didn=t know my name.
- Q. Was he wearin= a name tag?
- A. Um, no.
- Q. Can you describe him for me?
- A. All I know is he had white hair. White hair, white beard.
- Q. We=re talkin= white-white, like the blankets, or just blonde?
- A. White.

(BY DETECTIVE SAUNDERS:)

- Q. And how old is he, do you think?
- A. I have to say suh B suh B sixty.

(BY SERGEANT PENCE:)

- Q. Sixty. And he B about tall?
- A. Hmm, probably about five-seven.
- Q. Approximate weight? You know?
- A. Hmm, probably, like, 230.
- Q. So, he=s a big man? (BY DETECTIVE SAUNDERS:)
- Q. So, he=s B
- A. He=s B

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department <u>Suppose</u> S. M. - Curdy Director, Police Records Bureau Aecords Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. B he=s heavy. He=s heavy but not too tall?
- A. Yeah. He=s got, like, a potbelly, but, like B like, B he=s a tall man.

(BY SERGEANT PENCE:)

Q. Facial hair?

.

- A. Um-hum, all white beard.
- Q. He have a mustache as well?
- A. Um-hum.
- MS: Neatly B

(BY SERGEANT PENCE:)

- Q. Long beard? short beard?
- A. Uh, I think it was short.

(BY DETECTIVE SAUNDERS:)

- Q. Trimmed?
- A. Um-hum.

(BY SERGEANT PENCE:)

- Q. Anything unique about his teeth?
- A. I didn=t see that much of _____
- MS: Hmm

(BY SERGEANT PENCE:)

Q. Did you see any tattoos?

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department

Surpana S. M. Gurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Α.____.
- Q. And was he wearing glasses?
- A. No. Not that I knew. That I that I know.

(BY DETECTIVE SAUNDERS:)

- Q. Okay.
- A. I just know that without a doubt, he was my nurse downstairs.
- Q. Okay.
- A. He was the one who transferred me B
- Q. Did B
- A. B to my bed. And he was, like, I=m gonna take _____, you know, so.
- Q. Did he ever say, you know, he wants to call you later, or he wants to meet with you later or anything along those lines? Other than coming back at seven o=clock in the morning to see you?
- A. No. He just said, um, when I get off of work, I might stop up here and check in on you at seven, or somethin= like that.
- Q. Okay.

(BY SERGEANT PENCE:)

Q. He=s the same one who did _____?

Α.

Q. Okay.

AA2156

I hereby certify this is a full, true and correct copy of the. OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department. Sucona S. M. Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

I don=t have anything else.

- (BY DETECTIVE SAUNDERS:0
- Q. Was B was that a yes, he=s the same one who did this to you?
- A. Definitely, yeah.
- Q. Okay. All right.

Operator B

A. My husband walked in shortly B and he just missed him, and he left.

Q. Okay.

Operator, this will end the interview. The time is 1114 hours on the 16th of May,

2008. Same people present. Same location.

Thank you.

2013年1月1日日 1月1日日 1月1日日日 - 1月1日日 1月1日日日 - 1月1日日 1月1日日日 - 1月1日日 $\mathcal{L}(\mathcal{L}) = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \\ \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} \end{array} \right\} = \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} \right\} = \left\{ \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} & \mathcal{L}_{\mathcal{L}} \end{array} \right\} \right\} = \left\{ \left\{ \begin{array}{ll} \mathcal{L}_{\mathcal{L}} \end{array} \right\} \right\} =$

and Friddling

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department Support S. M. Curdy Director, Police Records Bureau Records Custodian

AA2159

CONFIDENTIAL

EVENT #080516-1021

OTATEMENT OF: ROXANNE GAGNINA

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO DRIVE, ROOM 725, ON THE 16th DAY OF MAY, 2008, AT 1114 HOURS.

MS:tp

· · · · · ·

and the second sec

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COP (/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sugana S. McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #: 080516-1021

SPECIFIC CRIME: SEXUAL ASSAULT

TIME OCCURRED:

LOCATION OF OCCURRENCE:

DATE OCCURRED:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: LORRAINE WESCOTT

| DOB: | | SOCIAL SECURITY #: | 1 1 |
|-------------------|---|-----------------------|--------------|
| RACE: | | SEX: | FEMALE |
| HEIGHT: | | WEIGHT: | |
| HAIR: | | EYES: | |
| WORK SCHEDULE: | | DAYS OFF: | |
| | 6900 NORTH DURANGO LAS VEGAS, NEVADA 89149 | HOME PHONE: | 702-629-1189 |
| WORK ADDRESS: | | WORK PHONE: | |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE M. SAUNDERS, P# 06076, LVMPD SEXUAL ASSAULT Detail, on MAY 29TH, 2008 at 1340 hours.

Q. Hello operator, this is Detective M. Saunders, S-A-U-N-D-E-R-S, P# 6076, conducting one followup taped interview reference event number 080516-1021.
 This interview=s taking place at 6900 North Durango, Las Vegas, Nevada 89149

Vol-Statement, No Affirmation (Rev 9/00) \$ AUTOMATED/WP12

at i film and had had a mind

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPDTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Subcace</u> S. McCurdy Director, Police Records Bureau Hecords Custodian

VFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

at the Centennial Hills Hospital. Uh, the time is uh, 1340 hours on the 29th of May, 2008. Present for this interview last name of Westcott, W-E-S-T-C-O-T-T, first name of Lorraine, L-O-R-R-A-I-N-E. Uh, she is the nursing supervisor here at Centennial Hills Hospital. Uh, work phone number here is 629-1189. Is that information I just read true and correct?

- A. Um, except you spelled my name wrong.
- Q. I=m sorry, how do you spell your name?
- A. There=s no T in the middle.
- Q. Oh, there=s no, there=s no, no T, it is just Wescott, WBW-E-S-C-O-T-T?
- A. Mm-hmm.
- Q. Okay. W-E-S-C-O-T-T. And I=m here to speak with you about the incident that occurred uh, back on the 16th of uh, May. Um, were you working on that day?
- A. Yes I was.
- Q. Okay. In, in what capacity?
- A. I was in a suBsupervisor.
- Q. Okay. And on that morning were you called up to room 725 in reference to talk to a patient by the name of Roxanne uh, Cagnina?
- A. Yes I was.

12.17

Q. Okay. Can you tell me what that uh, that conversation consisted of?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Suggad S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

- A. Um, when I went to the room the um, patient was crying. She reported that she had gone to the emergency room and the nurses last that were just wonderful to her. She didn=t have their phone numbers. On the elevator, on the way up she stated that the male nurse started adjusting her gown under the blanket. After she got into bed he said he=d be back, be back to check on her. She stated that he returned between 7:00 and 7:30 and started to touch her privates areas. She said that he told her how beautiful she was, touched her breasts. He said not to tell anyone, he=d lose his job. She then stated that he stroked her legs. She said he tried to penetrate her with his fingers, she told him no um, then another person came in and I guess he left. She said she called 9-1-1 but didn=t know what to tell them. Um, I asked her to describe the person, she said that he was an older man, white hairBhair and a beard. Um, he had written his number in her checkbook register so she gave me his number. Obviously I tried to comfort her, reassure her.
- Q. Mm-hmm.
- A. Um, her husband came in so I didn=t have to have anybody sit with her >cause he stayed with her.
- Q. Okay.
- A. Um, I obviously notified my superiors.

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugard S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

- Q. Mm-hmm.
- A. Um...and um, I also called the number that she gave me and Steve Farmer answered the phone.
- Q. Okay. And, I=m sorry, Steve Farmer answered the phone?
- A. _____ the phone.
- Q. Okay. And is that who she alleged uh, did this to her or wasBwasB
- A. Well I was just checkingB
- Q. Bwas this the nurse?
- A. Bon the white hair and the beard and B
- Q. Uh-huh,
- A. Bthe phone number >cause, you know obviously I needed to knowB
- Q. Okay.
- A. B_____(Both Talking)
- Q. WheBwhen Steve answered the phone what did he say?
- A. Um, I identified myself and I saidB
- Q. Mm-hmm.
- A. Byou know um, is this Steve and he=s like yeah, it=s Steve, you know what do you

need and I just told him that I was just checking up on him so.

Q. Okay, you just said you were checking up on him?

.

LATIGATIAL

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Survey</u> S. McCurdy Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #: 080516-1021

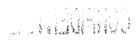
STATEMENT OF: LORRAINE WESCOTT

- A. Right.
- Q. Okay. Not to alert any suspicion or anything like that?
- A. No, I just needed to know and I was likeB
- Q. Right.
- A. B____ (Both Talking)
- Q. Okay. And she said that that the phone number that you called for Steve, that was given to her by the same man who um, was touching her anB
- A. Right.
- Q. B_____ (Both Talking)
- A. He had written his number in her um, check register.
- Q. Okay. Do you remember what that phone number was that she gave you?
- A. It was area code 707-332-5894.
- Q. Okay. And did she _____ do you remember did she tell you that he actually penetrated her or that he was attempting to penetrate her? OrB
- A. Um, my notes have that he tried.
- Q. He tried. Okay. Do you, do you ever remember her saying that he=d actually did?
- A. No, that=s the only thing. I wrote downB

Q. No. Okay. ButB

115

AA2170



I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugard S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

- A. Bexactly what she told me.
- Q. Bbut it is what she told you. Now did she say this occurred at what time, what time in the morning was it when it happened?
- A. She said he came back between 7:00 and 7:30.
- Q. Okay. And ____ she=s saying that=s when he started doing the touching?
- A. No, she said it started on the elevator the night when he brought her up, around3:00 in the morning.
- Q. Okay. All right. And...did she um...didBdid she give you a specific time or doBdo you have um, do you know what time it was that she was brought up from the E.R. to her room, do you have, do you remember what time it was?
- A. I never got to check but the patient told me it was around 3:00 a.m..
- Q. It was about 3:00 a.m..
- A. I never thought to check.
- Q. Okay.
- Α.
- Q. Okay. And then after she told then you of course ran it up the, youByou went to your supervisor=s andBand your superiors and made sure that everyone was, was documented in knowing? Okay. Um, have you ever had a problemBhave you ever met uh, Steve Farmer?

MINGORMO

I hereby certify this is a full, true and correct copy of the: OBIGINAL DOCUMENT (HARD COPY/COMPOTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunova</u> S. <u>IN Cardy</u> Director, Police Records Byreau Records Custodian



EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

- A. Yes, I have.
- Q. Okay. And you=ve worked with him in the past?
- A. Um, he=s the night shift I=m the day shift so obviously _____ checked in the office,
 I=ve never worked with him.
- Q. Okay, you=ve just seen him in passing basicallyB
- A. ____ (Both Talking)
- Q. Bbut you were aware of who he was?
- A. Yes.
- Q. ____ has there ever been any other complaints against him that you were aware of uh, prior to this incident?
- A. No.
- Q. No. Okay. Um, all the other nurses get along with him and no problems with him?
- A. It seems um, that everyone really, you know enjoyed working with him.
- Q. Okay. All right. Um, is there anything else that you can think of that can assist me in my investigation as I=m following up other leads on Mr. Farmer? Anything that I forgot to ask you that you think might be important?
- A. (Pause) Nope, I don=t think so.

INTRA MAN

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COT(Y/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on tile with the Las Vegas Metropolitan Police Department. <u>Sunna S. McCurdy</u> Director, Police Records Bureau Records Custodian

AA2175

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

Q. No. Okay. All right. Operator, this will end the interview, the time is uh, 1345

hours on the 29th of May, 2008. Same people present. Same location.

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO, LAS VEGAS, NEVADA 89149 ON THE 29TH DAY OF MAY, 2008 AT 1345 HOURS.

MS:az

• • • • • • • • • •

CONFIDENTIAL

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Summer S. M. Curdy Director, Police Records Bureau Records Custodian

AA2177



EVENT #: 080516-1021

SPECIFIC CRIME: SEXUAL ASSAULT/ OPEN AND GROSS LEWDNESS

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: KAREN GOODHART

| DOB: | SOCIA SECURITY # | |
|-------------------|---------------------|---|
| RACE: | SEX | • |
| HEIGHT: | WEIGHT | |
| HAIR: | EYES | |
| WORK SCHEDULE: | | : |
| HOME ADDRESS: | HOME PHONE | : |
| WORK ADDRESS: | WORK PHONE | • |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE SAUNDERS, P# 6026, LVMPD SEXUAL ASSAULT Detail, on May 30, 2008 at 0651 hours.

Q. Hello operator, this is detective M. Saunders, S-A-U-N-D-E-R-S, uh conducting

one taped interview reference event number 080516-1021. Um, this interview is

taking place at Centennial Hills Hospital at 6900 North Durango, Las Vegas,

Vol-Statement, No Affirmation (Rev. 9/00) \$ AUTOMATED/WP12

I hereby certily this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Surgeon</u> S. McCurdy Director, Police Records Bureau Records Custodian



PAGE 2

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Nevada 89149. The date is the 30th of May, 2008, at approximately 0651 hours. Present for this interview last name of Goodhart, G-O-D-H-A-R-T, first name of Karen, KAREN. Her date of birth is 07-12 of 59. She has a work phone number of 629-1211. Is that information true and correct?

- Α. Correct.
- Q. Okay. Is it alright if I call you Karen?
- A. Yes.
- Okay. Um Karen, I wanted uh direct your attention back to an incident that Q. occurred on the 16th of May. Um, involving another nurse that you were on shift with by the name, or is he the CNA?
- A. CNA, yes.
- Q. CNA. Yes, by the name of Steven Farmer. Do you know who I=m referring to?
- A. Correct, yes.
- Okay. Um, on the morning in question uh, you=re aware that uh Steven had been Q. arrested for um, for uh sexual assaulting a patient. And that patient uh, her name was Roxanne Cagnina.
- Α. Right.
- Q. Is that correct?
- Α. Yes.

LANTINE METAL

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPVICOMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Surface</u> S. M. - Curdy Director, Police Records Bureau Records Custodian

CONFIDEN

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- Q. Okay. Did you have um, were you working with Steven on that morning and also helping give care to Roxanne?
- A. I was taking care of Roxanne. Steven came in to transport the patient. He checked in on the patient every now and then. But basically I did the major portion of her care.
- Q. Okay. And she came in for B
- A. Seizures.
- Q. Seizures. Okay. And she was, I take it she was given more medication while she was here and everything else was ?
- A. Correct.
- Q. Okay. When, do you remember what time it was when Steven actually removed or took her from the ER area up to the seventh floor?
- A. No, I would have to look at the chart to refer back to the time that I wrote for the transfer.
- Q. Okay.
- A. I know that it was before seven A.M.
- Q. It was before seven A.M. huh? Okay.
- A. I can tell you that much.
- Q. Okay. If we needed to look at those charts, are they still available?
- A. I believe they would be in Medical Records.

MING

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suprava S. McCurdy</u> Director, Police Records Bureau Records Custodian



PAGE 4

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- Q. They=d be at medicalB
- Bas far as I=m, as far as I know, IB A.
- Okay. Um, when Mr. Farmer took her upstairs um, how long, how long is an Q. average trip to take somebody from the ER to a room and to come back, on average?
- I average probably ten to fifteen minutes. Α.
- Okay. And on this particular morning, was, how long do you think Mr. Farmer was Q. gone for?
- It seemed like he was gone for a long period of time, thirty to forty minutes, maybe. Α. This is, uh, I, he did not come back down until close to Maybe even longer. seven o=clock.
- You think it was close to se, okayB Q.
- Because I had, I know I had set it up somewhere between five-thirty and six-thirty Α. and I sent her up. Like I said for the exact time, I really don=t know.
- Okay. And, it just seemed to be quite a while? Q.
- It, it just seemed to be quite a long time. Α.
- Q. Okay.
- | saidB Α.
- Is that unusual? Q.

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sugana</u> <u>S. McCurdy</u> Director, Police Records Bureau Records Custodian



EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- A. It can be. For the most part, if the patient=s awake and alert and they=re able to move themselves and get to whoever upstairs and into the room, as far as I know from other transports that I have been on here in this facility since, and I=ve been watching Peter move these patients up and he=s back down in a flash. It=s like I haven=t seen any issues.
- Q. How is Mrs. Cagnina=s um, did she have any motor skills that would be able to assist him in helping herself moved from a Gurney to a bed?
- A. She would have been very sleepy but her motor skills should have been fine. She did have pain medication prior to going up that would have made her very drowsy.
- Q. Okay. Have you ever heard of any allegations or have you ever seen anything that has caused you concern or maybe cause concerning working with Mr. Farmer in the past?
- A. No because I=ve only been, I=m very new at this facility, so basically that was my first day, first time ever you know, being in his presence.
- Q. Okay.

98 V.

- A. I don=t, would not have known him.
- Q. Got ya. Um, how=s Mr. Farmer=s um, what was his personality, I mean was he gruff, was he polite, was heB

. . .

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. M. - Curdy Director, Police Records Bureau Records Custodian



EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- A. Very polite, very nice gentleman. From what everybody else told me he was very gentle and caring and that=s what I was told. It=s like and very, wanted to make sure he was in there doing his job and let him know if we needed anything.
- Q. Okay. So he took her, you think it was some time five-thirty, six-ish (both talking)
 you think. I know it=s been several weeks (both talking).
- A. Yeah, really oh I couldn=t even told you that morning what time I sent her up.
- Q. Okay. You just remember sending her up and that he was gone and it seemed to be an extended period of time?
- A. Correct.
- Q. Um, when he came back down, did he say anything?
- A. Just that um, she was sleeping, he had to wake her up and it took him a while he needed to find an IV pole and trying to get the nurse into the room.
- Q. Okay. And did he say which nurse he was trying to get in to the room?
- A. No. Just the, it would have been the primary care nurse for that floor, that shift.
 >Cause it still would have been night shift nurses up on the ninth floor, ____ floor
- Q. Okay. Is that, okay, so nurses are already up there on the floor. Is it, is it uncommon for the nurses for him to have to actually go locate a nurse to let them know that he needed, he needs them in the room?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPYCOMPUTERIZED/MICROGRAPHIC COPY)

翩舞之参,严

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. M. Gurdy Director, Police Records Bureau Records Custodian



PAGE 7

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- No that would not be uncommon. Most the time you would have to, you=d put the Α. call light on wait.
- Q. Mm-hmm.
- Sometimes if they see you come up, they will be there or whatever but most the Α. time you=d have to get their attention.
- Q. Okay.
- Go find them. And they, you know, they could be in the room. I=m not sure what Α. their nurse to patient ratios are upstairs and how many nurses they have, soB
- Q. Okay, um, so when you came back downstairs everything just seemed fine, other than the fact that he was gone, it seemed to be for an extended period?
- Α. Yeah, right.
- Q. Okay. Make any comments to anything?
- Α. That just, that he had to wake her up and stuff.
- Q. Okay.
- Α. >Cause she was quite comfortable when she went upstairs.
- Q. Did um, when did you first hear about the allegations?
- Α. At, whatever time in the morning you guys called me.
- Q. Well, when I first called you and left a message?
- Α. Yes. Yes.

ana ann an Arrainn Iomraichte ann an Arrainneachta

COMPRENTIAL

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- Okay. So it was ten-thirty, eleven in the morning I think, somewhere in thereB Q.
- Α. Yeah. That=s B
- Q. l left a message. Okay.
- No actually I had talked to you >cause the phone was at the head of the bed. So, Α. but it was, so somebody called and the phone rang. No I guess it, >cause my

husband did, I think there was a second call or something.

- I think I called your cB, uh I had two different phone numbers for you, I called one Q. (both talking)B
- One on the cellB Α.
- Okay. The first, the home phone when you called, that=s when. Α.
- Okay. Q.
- Yeah, the cell phone I leave out of the room. A.

- Okay. Did um, have you ever heard or did anybody ever tell you about any other Q. um, inappropriate things that Mr. Farmer=s ever done?
- No sir. Α.
- Ever had any other complaints? Q.
- No. Α.
- Okay. Is there anything else you can think of that might be beneficial to me with Q. my investigation as far as uhB

JATTIE (TRAC)

I hereby certily this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department Suppose S. McCurdy Director, Police Records Bureau Mecords Custodian



EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- A. No because it=s like I didn=t even let him, like when I had her use the bed side commode and the bedpan, I took care of that because I=m not gonna let a male when I got time to do it.
- Q. I understand.
- A. So, you know, he wasn=t going in the room except for um, I took her off the monitor and he said that was his job to take her off the monitor. But you know, I, as like well I already got it. Like, that=s what I do.
- Q. Right. >Cause you=re the primary nurse and he=s more the assistant.
- A. Just _____ for the most-part, they do. They take them off the monitor=s themselves and roll them upstairs.
- Q. Did he seem upset by that?
- Yes, maybe it was a little _____ that was his job to do that. You know he was, to take care of everything and it=s like, l=mB
- Q. Okay.
- A. I=m a primary care nurse. I don=t, I=m not used to anybody doing something else.
- Q. Working your patient?
- A. Right
- Q. You take care of yourB

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY, COMPUTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Support</u> S. M. <u>Curdy</u> Director, Police Records Bureau Records Custodian



EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- A. I take care of my patient.
- Q. Got ya. Okay, um, so you found that a little odd that he would be so direct about the IV thing?
- A. Maybe a little bit but you know, nothing that I would B
- Q. Nothing that, hind sight is twenty-twenty of course, but at the time?
- A. At the time, no.
- Q. Okay, alright. Um, anything else you can think of?
- A. No.
- Q. Okay. Operator, this will end the interview. The time is approximately seven o=clock on the 30th of May. Same people present. Same location. Thank you.

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE 30TH DAY OF MAY, 2008 AT 0700 HOURS.

MS:lc

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Survey</u> S. McCurdy Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #:080516-1021

SPECIFIC CRIME: SEXUAL ASSAULT; OPEN AND GROSS LEWDNESS

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: MURRAY, CHRISTINE

| DOB: | | SOCIAL | , |
|-------------------|--|-------------|---|
| | | SECURITY #: | |
| RACE: | | SEX: | Female |
| HEIGHT: | | WEIGHT: | |
| HAIR: | | EYES: | |
| WORK SCHEDULE: | | DAYS OFF: | |
| HOME ADDRESS: | 3350 N. Durango #1120 Las Vegas, Nevada 89149 | HOME PHONE: | 734-624-2755 |
| WORK ADDRESS: | | WORK PHONE: | |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by Detective M.

Saunders, P# 6076, LVMPD Sexual Assault Detail, on 06/13/2008 at 0635 hours.

Q. Good morning, Operator, this is Detective M. Saunders, S-A-U-N-D-E-R-S. A conducting one taped interview reference event number 080516-1021. This interviews taking place at 6900 North Durango Las Vegas, Nevada 89149.

Vol-Statement, No Affirmation (Rev. 9/00) \$ AUTOMATED

ONFIDENTIAL

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Singuna S. McCurdy</u> Director, Police Records Bureau Records Custodian

LAS VEGAS METROPOLITAN POLICE DEPARTMENT **VOLUNTARY STATEMENT** PAGE 2

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

Centennial Hills Hospital, sixth floor, um, nurse, nurses supervisors room. A it is approximately 0635 hours on the thirteenth of June, 2008. Present for this interview um, last name of Murray, M-U-R-R-A-Y, first name of Christine, C-H-R-I-S-T-I-N-E. Date of birth of 04-0 - or, 04/20/1950, a address of 3350 North Durango Drive #1, 120 Las Vegas, Nevada 89129. She has a contact phone number of 734- a 624-2755. Is that information true and correct?

- A. Um-hum, yes it is.
- Q. Okay. And is it alright if I call you Christine or -
- A. Chris is fine.
- Q. Chris is fine, okay.
- A. Um-hum.
- Q. Um, Chris, I=m here to speak to you about an ongoing investigation that I have um,
 a reference a CNA that a was arrested out of this hospital. Are, are you familiar
 with what I=m talking about?
- A. Yes, I am.
- Q. Okay. And do you know the name of that individual?
- A. Yes.
- Q. That CNA?
- A. Steve Farmers.

I hereby certify this is a full, true and correct copy of the ORIGINAL DOCUMENT (HARD COPY,COMPUTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sugana S. M.C.Curdy</u> Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Q. Okay. And I wanna direct your attention back to the sixteenth of May, a 2008.
 Were you working that night?
- A. Yes, I was.
- Q. In which capacity were you working?
- A. Registered nurse.
- Q. Okay.
- A. On the seventh floor.
- Q. On the seventh floor. And that, that particular morning did you have a patient brought up from the ER by the name of Roxanne Cagnina (phonetic)?
- A. Yes, I did.
- Q. Okay, and do you remember, by chance, what room number she went into?
- A. I believe it was 727.
- Q. 727, okay, it could of been 725?
- A. Yes.
- Q. Okay, 725, okay. Um, when she was brought up, um, can you, can you explain to me the, the details um, of the first time that you had contact with her. As, as best you remember.
- A. With her?
- Q. Well, yes, we=ll, we=ll get back to Mr. Farmer.
- A. Okay,

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY, COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> <u>S. McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021 STATEMENT OF: MURRAY, CHRISTINE

- Q. But we just, like what time was she brought up to the floor, that you remember?
- A. She came up to the floor about four-twenty. The first that I saw her was when myself and the CNA, Corrine, walked in. We had been told that she had, had seizures. So we wanted to a pad the bed rails. We found um, Mr. Farmer, walking her into the bathroom. We said, we would take it from there and he left immediately. And we walked her back, back to the bedroom. Back a, to the bed, after.
- Q. Okay. Did she say anything to you after Mr. Farmer left? Did she appear distraught, distressed, anything?
- A. She seemed confused. A when somebody has a lot of a drugs in them -
- Q. Um-hum.
- A. -a like that. Um, she did say, when we were walking her back, from the bathroom to the bed, are, is it all girls here? And we said, yes. And she said, oh good, I wanna pull my gown this way so when I sit down, I don=t choke myself. Which a lot of people do.
- Q. Okay.
- A. And so we said, oh yes, it=s all girls here, you go right ahead. And she did and then she got into bed.

I hereby certify this is a full, true and correct copy of the. ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY -8 2013

on file with the Las Vegas Metropolitan Police Department.

Subana S. McCurdy Director, Police Records Bureau Aecords Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Q. Okay. Um, when she was first brought, you say she got in, in about four-twenty. Was that the first time you physically saw her or did you see him like coming off the elevator with her at four-twenty?
- A. No, that was the first time I saw her, in her room, was the first time I saw her.
- Q. Okay. Saw her, okay. And how did you know that she was a put into her room? She was brought-
- A. Because well, I was standing in another patients room, speaking to the family members.
- Q. Um-hum.
- A. Mr. Farmer came into the other patients room and told me that the patient he had just brought up and put in a room twenty-five was um, on a lot of drugs, pain killers and such and that she was kinda loopy and that she wouldn=t notice if I didn=t come right over there to see her.
- Q. Okay. And is that common? Has he, has he ever -
- A. I-
- Q. done something like that before?
- A. I had never had him do that before.

and the second second

Q. Okay, and how long would you say, I know you didn=t work directly with him, but how often, a how long have Mr. Farmer - had you seen Mr. Farmer at the hospital?

MAY - 8 2013 on file with the Las Vegas Metropolitan Police Department <u>Suppone</u> <u>S. M. Curdy</u> Director, Police Records Bureau Records Custodian

t hereby certify this is a full, true and correct copy of the OBIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)



CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

A. I=d say for at least two months on and off, you know, cause we work different days

but I=d seen him around quite a bit.

- Q. Right. Okay, so he=d been there awhile?
- A. Yea.
- Q. And that was the first time he ever made a comment to you like that about a -
- A. Yes.
- Q. -a patient.
- A. Yes.
- Q. Okay, did you find that odd?
- A. I found that strange, first of all, cause their not supposed to just walk into another patients room. You=re not supposed to walk into a patients room unless you have business in there. And he didn=t have business in there, he could of told that to my charge nurse.
- Q. Okay. Um, at um, okay and he told you ______ that, that she=s ready, ready to go be seen and then when you went in, um, in the room that=s when you found him about to take her to the bathroom and you guys -
- A. He actually was walking her into the bathroom.
- Q. Okay. Was she exposed in any way?
- A. No.

we we have a stand of the w

.

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZEDIMICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> S. <u>IN Courdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Okay. Um, and that was at, you said about four-twenty. Q.
- Um-hum. Α.
- Okay. Q.
- Yes. Α.
- And what time, do you, do you recall what time that you annotated on your notes, Q.

for arrival?

- A around a quarter to five. Α.
- Okay. And is, would this um, I=m gonna show you this paper right here and it=s a Q.

- it=s a, looks like nurses notes.

- Um-hum. Α.
- It=s um, given to me by Centennial Hills. It says, 0445 a, patient to floor on Q.

stretcher. A vi..,

- Vital signs stable. Α.
- Okay. Heavily sedated, needed assistance to walk to bathroom, stated my Q. headache is still not gone.
- Um-hum. Α.
- Okay. Alright. Now, did she disclose or she say anything to you at that time about Q. anything that a, a might of happened to her or occurred?
- No. Α.
- And did she seem distressed or scared? Q.

on the Willy

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/QOMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Surgan S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

PAGE 8

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- A. No, she seemed, the thing that she seemed the most was distress cause her headache. She had come in with a headache, she=d had it for a couple days. And that was the one thing, she said it doesn=t seem to matter what their, they=re giving me, it=s not getting rid of this headache.
- Q. Okay. Alright. So, um, you had made a comment to me earlier that a when you were ______ the gur.., the gurney was outside the door .
- A. Um-hum.
- Q. Can you explain that to me? What, what was the -
- A. When he came to me and I finished talking to the patients.
- Q. Um-hum.
- A. The other patients and a it took me, I=d say, three to five minutes to finish up there and walk around where her room was.
- Q. Um-hum.
- A. It was on the other side. And I noticed his gurney was still there, which surprised me because our transport people usually bring the person up. Get them into the bed as quickly as possible, and then get back downstairs because we don=t have a lot of transporters and we, their usually called on their walkie talkies, like come on down. We=ve got somebody else to transport. So you usually don=t see a gurney and a trans.., and a transporter hanging around.

MMAC

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Supra S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

PAGE 9

EVENT #:080516-1021 STATEMENT OF: MURRAY, CHRISTINE

- Q. Okay.
- A. So when we walked in and we saw him, and we said, we would take over from here
 a Corrine and I, the CNA. He um, disappeared. He like grabbed the gurney and went.
- Q. Okay. Cause normally he did, he wouldn=t of even been there, he would of

already -

- A. Right, right, he would of gotten her into the bed, handed her the call light, and showed her how to use it, and been gone.
- Q. Okay. And was that um, and that was at about, what time do you think, four-twenty?
- A. Probably about, yea, around four-twenty.
- Q. Okay. Um, lets see, _____. Um, as far as, well, _____ well, back to that. Did um, at about seven a.m, did you go and check on the patient again?
- A. No, I had been in there around six-thirty. A I was trying to find out if she had had a seizure, I was trying to a anticipate what her um, her needs were for the next shift when they were coming on.

Q. Yea.

and and a second s

A. If she needed anymore medicine or if she could have anymore medicine. At about six-thirty, she seemed like she was kind of dozing off so, I didn=t wanna interrupt

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugga S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

her. Cause sometimes sleep will get rid of the headache. So, I left her about six-thirty and I, I did not see - I was not looking toward her room.

- Q. Okay.
- A. The majority of my patients were on the other side.
- Q. Okay.
- A. So, I really didn=t ch.., I figured she had gone to sleep. We weren=t gonna disturb her.
- Q. Okay. Do you ever recall seeing Mr. Farmer back up on the floor, anytime between six-thirty, seven o=clock?
- A. No, I do not.
- Q. Okay.
- A. But then I wasn=t looking for him.
- Q. Did, has any other nurses or anyone else said anything to you that they saw him at about seven o=clock, standing in her room?
- A. No.
- Q. Walked in on, _____.

er eigen eine state auf der eine st

- A. Nobody mentioned that to me.
- Q. Okay. Um, did when did you first find out about the allegations of that, the patient
- Roxanne Cagnina, had against Mr. Farmer?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY) MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Surana</u> S. IN-Curdy Director, Police Records Bureau Records Custodian

CONFIDENT

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- A. When I woke up the next day and there were a couple messages from you, on my phone, and I called you because of course, the first thing I thought was my daughters, my granddaughter.
- Q. Okay.
- A. Those were the things I thought because nobody had the courtesy from here, to call and say that something had happened and they had given you my telephone number. Which I was really upset about.
- Q. Okay. You=re -
- A. Not that I gave you the number -
- Q. Right.
- A. -but that they didn=t call me and tell me so I -
- Q. That they didn=t bother to no..., notify you on -
- A. Yea.
- Q. -on what was happening.
- A. Yea.
- Q. Did um, okay. On a did Ms. um, Cagnina, at any time, make any disclosures to you about anything that Mr. Farmer had done to her?
- A. No, she did not.

Q. Okay. Alright. And can, what are - well let me, let me back up. You had made a comment earlier um, that he seemed to be very um, attentive.



I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY (COMPDTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department <u>Supple</u> S. McCurdy Director, Police Records Bureau Records Custodian

EVENT #:080516-1021 STATEMENT OF: MURRAY, CHRISTINE

A. Um-hum.

- Q. Can you, can you go over those details with me. What, what was it that you o..., you observed about um, Mr. Farmer?
- A. Well, when he brought a patient up, if they had to have a ______ on, he would offer to put the ______ on. Which means of course, you know, behind the chest and a they have to go on the rib cages. So of course, on women it=s usually, you have to move the breast to put the, underneath the breast and stuff. He would always say, oh I=II do that for you, you know, and you do what you have to do. He was always very complementary to everybody. He was always willing to do something extra if you wanted to. Very um, you know, just very helpful. He just wouldn=t -
- Q. Did it seem to be more for female patients or any patient?
- A. Actually, I think it was more for female patients.
- Q. Okay, and when you say he had to put on the to..., _____-
- A. Um-hum.
- Q. -how many, how many points of um, these, these leads?
- A. There=s five leads.
- Q. There=s five leads.
- A. On our portable monitors, _____

Hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY) MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sucial S. M. C. Curdy Director, Police Records Bureau Hecords Custodian

CONFIDENTIAL

PAGE 13

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Q. And there=s, so one on basically on top of a, a below the clavicle -
- A. Right here.
- Q. -above, above the breast.
- A. Yea, by the belly area here.
- Q. And then two, one under each side of the breast -
- A. Right.
- Q. -and then one in between the breast.
- A. Right.
- Q. Okay. And he always seemed more than willing to -
- A. Oh, I=II put that on for you, yup.
- Q. Did um, as far as his job, um, a is where a CNA is concerned, does that normally does, when somebody puts on the _____, is that usually conduc.., um, completed by a nurse?

by a horse.

- A. No, we do have the CNA=s do that.
- Q. (inaudible, both talking).
- A. So, see that=s not really out of the realm of his responsibilities.
- Q. Um-hum.

A. So, nobody thought anything of it.

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> S. McCurdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Q. Okay. Would, does CNA duties change from floor to floor? Like if somebody, like would ER have their own set of, of things that CNA=s can do and things that they can=t as compared to a CNA that was assigned to a, a floor for recovery?
- A. I think they would, yes.
- Q. Okay.
- A. I=m not positive.
- Q. Um-hum.
- Because I=ve never worked ER. Um, but I would think they would because that=s
 the first assessment is to ______ first everything that their coming in and their usually
 pretty serious down there.
- Q. Oh, okay. Um, can you think of anything else that I didn=t ask you or I might not be aware of that you feels important, that might assist me in my investigation or something that I need to be made aware of?
- A. The only thing I can think of like I said, is the older lady that he did the one to one sittings with.
- Q. Um-hum.
- A. Which means that the doctor ordered for somebody to be in the room with her at all times. He was in there, on the evening shift, it was dark because he has the lights out. The door was closed. Which usually for a one to one, I, if I had been the

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Surgens</u> <u>S. McCurdy</u> Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

nurse, which I wasn=t. I would want the door open. I wanna see what=s going on. But we did hear her yelling. I don=t want you by me, get outta here. And we thought, she=s a little crazy.

- Q. Um-hum.
- A. She=s a little crazy, old lady, that=s why she has the sitter.
- Q. Um-hum.
- A. So we didn=t put any credence into what she was saying.
- Q. Okay. Do you remember when that occurred?
- A. I don=t.
- Q. Okay. Before or after this incident, that we=re talking about?
- A. Before. Before.
- Q. Okay. A couple of weeks, couple of days?
- A it had to be more toward the beginning of when we opened up because it was on the sixth floor here and we didn=t open the seventh floor until about two in a half, three months after we opened. So, obviously, it have to be probably in February or March, something like that.
- Q. Okay, Do you remember what she was um, in for, what that victim -
- A. I don=t know.
- Q. -or _____ the patient, _____.

MUM04M00

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY COMPUTERIZED MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Surgana S. M. Curdy Director, Police Records Bureau Records Custodian

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- A. Cause I, you know what, I never had her as a patient.
- Q. Okay.
- A. So.
- Q. Um, ever observe or see anything else that just didn=t seem right with you? A anything that Mr. Farmer ever did that was, a out of the scope or realm of his duties or anything else that just appeared professional. From, from your professional opinion and, and your knowledge of the, the nursing field. Of something that he wasn=t doing that was correct with patients?
- A. No. But you know what, I didn=t pay much attention to him.
- Q. Okay. Alright. Is there anything else?
- A. No.
- Q. Okay. Operator, this will end the interview. The time is approximately 0649 hours, on the 13th of June, 2008. Same people present, same location. Thank you.

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE 13th DAY OF JUNE, 2008 AT 0649 HOURS.

MS:st

MARAN

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose S. McCurdy</u> Director, Police Records Bureau Records Custodian



Date: October 9, 2012

Sorenson Case#: SF004140

Client Case #:

C245739 080516-1021

WINFINEN II

OCT: 1-6-2012

Forensic Case Report

TO: Las Vegas Metropolitan Police Department Forensic Laboratory Attn: Ms. Kimberly Murga 5605 W. Badura Ave, #120B Las Vegas, NV 89118 Offense: Sexual Assault

Case Names: Steven Dale Farmer - [Suspect] Roxanne Cagnina - [Victim]

Evidence Received:

| Sorenson Item # | Agency Item # | Description |
|-----------------|-----------------|-------------------------------------|
| 1 | ACE#08031650-1D | Vaginal swabs |
| 2 | ACE#08031650-1F | Labial swabs |
| 3 | ACE#08031650-1E | Face swabs |
| 4 | ACE#08031650-1G | Reference - Roxanne Cagnina |
| 5 | ACE#08031650-1A | Extract from breast swabs |
| 6 | ACE#08031650-1B | Extract from thigh swabs |
| 7 | ACE#08031650-1C | Extract from reagent blank |
| 7 | 8177-1/1 | Right hand finger swabs from Farmer |
| 8 | 8177-1/2 | Left hand finger swabs from Farmer |
| 9 10 | 8177-2/5 | Reference - Steven Farmer |

Results Conclusions and Opinions:

Item 1 (Vaginal swabs):

No Y-STR DNA profile was obtained from this item.

Item 2 (Labial swabs):

A partial Y-STR DNA profile that is not suitable for comparison was obtained from this item.

item 3 (Face swabs):

A complete mixture of Y-STR DNA profiles from two contributors was obtained from this item. The major Y-STR DNA profile obtained matches the Y-STR DNA profile obtained from Steven Farmer. Steven Farmer and his paternal relatives cannot be excluded as a source of the male DNA identified on this item. The major Y-STR DNA profile obtained was observed 4 times in a population of 13248 individuals. Applying the 95% upper confidence interval results in a frequency of 0,00068, which is equivalent to approximately 1 in every 1471 individuals. The minor Y-STR DNA profile is attributable to an unknown male and is suitable for comparison.

Item 4 (Reference - Roxanne Cagnina):

A complete DNA profile that genetically types as female was obtained from this item.

2495 S. WEST TEMPLE, SALT LAKE CITY, UT | TOLL FREE: (888) 488-1122 | FAX: (800) 405-3168 www.sorerisonforensics.com Page 1 of 3



I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Suppose</u> <u>S. McCurdy</u> Director, Police Records Bureau Mecords Custodian

Sorenson & Forensics

Sorenson Case#: SF004140

Client Case #: C245739 080516-1021

Date: October 9, 2012

Item 5 (Extract from breast swabs):

A partial Y-STR DNA profile that is not suitable for comparison was obtained from this item.

Item 6 (Extract from thigh swabs):

A partial mixture of Y-STR DNA profiles from two contributors was obtained from this item. Due to the inability to provide statistical calculations no comparison can be made at this time.

Item 7 (Extract from reagent blank):

No Y-STR DNA profile was obtained from this item.

Item 8 (Right hand finger swabs from Farmer):

A complete DNA profile that matches the DNA profile obtained from Steven Farmer was obtained from this item.

Item 9 (Left hand finger swabs from Farmer):

A complete DNA profile that matches the DNA profile obtained from Steven Farmer was obtained from this item. Analysis for the presence of additional contributors was inconclusive.

item 10 (Reference - Steven Farmer):

A complete DNA profile that genetically types as male was obtained from this item. A complete Y-STR DNA profile was also obtained from this item.

Notes:

Las Vegas Metropolitan Police Department Forensic Laboratory requirements were used in the interpretation of the results, per client request.

All submitted items, slides and DNA extracts generated during the course of examination will be returned to the submitting agency.

Should a suspect (and/or elimination standards) become available, known reference standards (oral/buccal swabs) should be obtained and submitted to Sorenson Forensics for further comparison.

Inconclusive DNA results indicate that possible allelic activity was observed below the laboratory's analytical threshold or that portions of the DNA profile appear at such low levels that no conclusions can be drawn as to the source.

The DNA extracted from the items listed above was amplified using the Polymerase Chain Reaction (PCR) and typed at the loci D8S1179, D21S11, D7S820, CSF1PO, D3S1358, TH01, D13S317, D16S539, D2S1338, D19S433, vWA, TPOX, D18S51, Amelogenin, D5S818, and FGA using the Identifiler® Plus PCR Amplification and STR Typing Kit.

The DNA extracted from the items listed above was amplified using the Polymerase Chain Reaction (PCR) and typed at the loci DYS456, DYS389(I), DYS390, DYS389(II), DYS458, DYS19, DYS385, DYS393, DYS391, DYS439, DYS635, DYS392, GATA H4, DYS437, DYS438, and DYS448 using the Y-filer® PCR Amplification and Y-STR Typing Kit.

The haplotype profile frequencies are calculated using the counting method. The US Y-STR Database located at http://www.usystrdatabase.org/ was utilized to determine the profile frequency. The following ethnic classifications were included in this population database: African American, Asian, Caucasian, Hispanic and Native American.

> 2495 S. WEST TEMPLE, SALT LAKE CITY, UT | TOLL FREE: (888) 488-1122 | FAX: (800) 405-3168 www.sorensonforensics.com Page 2 of 3

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sunana S. McCurdy</u> Director, Police Records Bureau Records Custodian



Sorenson Case#: SF004140

Client Case #: C245739 080516-1021

Date: October 9, 2012



Y-STR profiles within a paternal lineage are typically identical. Thus, any Y-STR DNA profile developed in this case would likely include paternal relatives.

Respectfully submitted,

Emily Olokie

Emily Jeskie Forensic DNA Analyst II

1111

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTEDIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. <u>Sugan</u> <u>S. M. Gurdy</u> Director, Police Records Bureau Records Custodian

LAS VEGAS METROPOLITAN POLICE **PROPERTY WITHDRAWAL RECEIPT** PAGE / DATE 06-13-2012 **PROPERTY BUREAU** TIME 01:34:04 PM **ITEM INFORMATION** DESCRIPTION AC# 08031650 liem 1A \$0.00 CS# Oty 1 **DNA EXTRACT JM-111 FROM BREAST** EV# 0805161021 Type UNCLASS SWAB IN S/AKIT OF ROXANNE CAGNINA 婑 Flags AC# 08031650 liem 1B \$0.00 Qty 1 CS# **DNA EXTRACT JM - 112 FROM THIGH** Type UNCLASS EV# 0805161021 SWAB IN S/AKIT OF ROXANNE CAGNINA 麼 Flags AC# 08031650 1C ltem \$0.00 1 CS# Qty DNA EXTRACT EV# 0805161021 Type UNCLASS RBQ - 120511-JM2 愛 Flags liem 1D AC# 08031650 Qty 1 \$0.00 CS# VAGINAL SWABS FROM S/A KIT MARKED Type UNCLASS EV# 0805161021 KP1B1 æ. Flags AC# 08031650 liem 1E Oly. 1 \$0,00 CS# FACE SWABS FROM S/A KIT MARKED EV# 0805161021 Type UNCLASS KPICI 麥 Flags AC# 08031650 liem 1F Qty 1 \$0.00 CS# LABIAL SWABS FROM S/A KIT MARKED EV# 0805161021 Type UNCLASS KPIG 会 Flags AC# 08031650 ltem **1**G CS# Ôtv. 1 \$0.00 **BUCCAL SWAB FOR CAGNINA FROM S/A** Type UNCLASS EV# 0805161021 KIT MARKED KPIA Flags *₩* AC# 08031650 1H liem 1 \$0.00 Qty CS# **COPIES OF PAPERWORK FROM S/A KIT** Type UNCLASS EV# 0805161021 FOR CAGNINA кф Flags RECEIVED FROM EVIDENCE CUSTODIAN EVID ANGELA MOORE, FOR [004028] REASON PROPERTY IS BEING REMOVED: Lub Request TURNED OVER TO COURT, CITIZEN, DISTRICT - RECEIPT -

SIGNATURE:

SORENSON FORENSICS WEST TEMPLE • SALT LAKE CITY, UT 84115

RANK: P#: AGENCY:

INSTRUCTIONS:

Person removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the itemist within 5 days.

TXOOTRep

?

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Suggas S McCurdy Director, Police Records Bureau Records Custodian

| Sec Bg: 1/1 AC# 08031765 Item 2 Type UNCLASS Flags Flags Frame AC# 08031765 Item 5 CS# F Qiy 1 AC# 08031765 Item 5 CS# F Qiy 1 DV# 0805161021 Type UNCLASS Flags Fig Fig Fig | | | | | | | | |
|--|--------|---------------|----------------|--|-----------------------|-----------------------------|---------------------------------|---------------------|
| AC# 08031765 hem 1 Cy 0805161021 Type UNCLASS Flags F CONFED FARMER Pkg/Im: 1/1 See Bg: 1/1 AC# 08031765 hem 2 SW F CONFED FARMER Pkg/Im: 1/1 See Bg: 1/1 AC# 0805161021 Type UNCLASS Flags F Cy 0805161021 Type UNCLASS Cy 0805161021 Type UNCLASS Flags F Cy 0805161021 Type UNCLASS Flags F Cy 0805161021 Type UNCLASS Cy 0805161021 Type UN | | TE 06-13-201. | DATE | VITHDRAWAL RECI | RTY W | PROPER | | |
| NC# 08031765 hem 1 S# F Qty 2 Type UNCLASS FARMER Flags Pkg/Im: 1/1 Sec Bg: 1/1 CONFE NC# 08031765 Item 2 SK F Qty 2 EV# 0803161021 Type UNCLASS Flags Farmer Flags Farmer Sc Bg: 1/1 CONFE NC# 0803161021 Type UNCLASS Flags Farmer Flags Farmer Flags Farmer Fug/Im: 1/2 Sce Bg: 1/2 NC# 08031765 Item 5 CM F Qty 1 Type UNCLASS Farmer Flags Farmer Flags Farmer Nov Butccat Swab Kit - Steven FARMER Fkg/Im: 1/2 Sce Bg: 2/5 NONEY TOTAL Sce Bg: 2/5 MONEY TOTAL RECEIVED FROM EVIDENCE CUSTODIAN EVID ANGELA MOORE, FUR (04403) Lab Request Farmer TURNED O VER TO COURT, CITIZEN, DISTRICT RECEIVET - RECEIPT - | | \$ | N | DESCRIPTION | | 'IN | FORMATIC | ITEM IN |
| TSR F QIY 2 Type: UNCLASS Plays Plays Plays Plays Plays AC# 08031765 Icm 5 SW# P QIY 1 SV# 0805161021 Type: UNCLASS Flags Play DNA BUCCAL SWAB KIT - STEVEN FARMER Pkg/Im: 1/2 Sec Bg: 1/2 DNA BUCCAL SWAB KIT - STEVEN FARMER Pkg/Im: 1/2 Sec Bg: 2/5 Sec Bg: 2/5 Sec Bg: 2/5 MONEY TOTAL | \$0.00 | CONFIDE | S - STEVEN | RT HAND FINGER SWABS FARMER Pkg/Itm: 1/1 | 愛 | 1 2 | hem Qty Type | # 08031765 # F |
| SH F Qty 1 Type UNCLASS Flags Flags Pkg/Im: 2/5 See Bg: 2/5 MONEY TOTAL MONEY TOTAL See Bg: 2/5 MONEY TOTAL EVID ANGELA MOORE, FOR (044028) RECEIVED FROM EVIDENCE CUSTODIAN REASON PROPERTY IS BEING REMOVED: EVID ANGELA MOORE, FOR (044028) Lab Request Image: Control of the second secon | \$0.00 | | ABS - STEVEN | FARMER Pkg/ltm: 1/2 | ¢ | 2 | Qīv Туре | H F |
| RECEIVED FROM EVIDENCE CUSTODIAN REASON PROPERTY IS BEING REMOVED: Lab Request TURNED OVER TO COURT, CITIZEN, DISTRICT - RECEIPT - | \$0.00 | | - STEVEN | FARMER Pkg/Itm: 2/5 | 愛 | 1 | Qty Турс | # F |
| REASON PROPERTY IS BEING REMOVED: Lab Request TURNED OVER TO COURT, CITIZEN, DISTRICT - RECEIPT - | | | · | | | | | |
| - RECEIPT - | | | | | | | | |
| SIGNATURE: WUYAON WChalman RANK: SORENSON FORENSICS 2495 SOUTH WEST TEMPLE • SALT LAKE CITY, UT 84115 INSTRUCTIONS: Person removing iten(s) will either return the item(s) or return an executed copy of the receipt bearing the signature | | | P#: AGENCY: | - RECEIPT - | <i>L_M</i> KE CITY | <u>Acha</u> iple•salt la | HAD FORENSICS TH WEST TEN | SORENSO 2495 SOU |



I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COP#COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. $\underbrace{Sunaa}_{\text{Director, Police Records Bureau}}_{\text{Hecords Custodian}}$

| Las Vegas Metropolitan Pol | lee Department PR | OPERTY V | VITHDRA WAL | | AGE 1 |
|---|---|-----------------------|---|------------------|-----------------------------------|
| PROPERTY BURI | EAU | | | | ATE 06-13-2012 IME 01:09:13 PM |
| ITEM II | NFORMATION | | DESCR | IPTION | \$ |
| AC# 08031755 CS# F EV# 0805161021 | ltem 1 Qty 2 Type UNCI Flags | ass Ø | RT HAND FINGER S FARMER Pkg/Itm: 1/1 | WABS - STEVEN | \$0.00 CONFIDENTIA |
| AC# 08031765 CS# F EV# 0805161021 | liem 2 Qty 2 Type UNCI Flags | ASS 🔗 | Sec Bg: 1/1 LEFT HAND FINGE FARMER Pkg/Itm: 1/2 Sec Bg: 1/2 | R SWABS - STEVEN | \$0.00 |
| AC# 08031765 CS# F EV# 0805161021 | ltem 3 Qty 1 Type UNCI Flags | ASS 😥 | | ERNAIL SCRAPINGS | \$0.00 |
| AC# 08031765 CS# F EV# 0805161021 | Item 4 Qty 1 Type UNCI Flags | ASS | LEFT HAND FINGE STEVEN FARMER Pkg/Itm: 1/4 Sec Bg: 1/4 | RNAIL SCRAPINGS | \$0.00 |
| RECEIVED FROM EVIDENC REASON PROPERTY IS BEI | | /ID ANGELA MO | , DRE, FOR [004028] igation | | |
| OFFICER RECEIVING ITEM | SIGNATURE: | yelow | Mara | | |
| PHOTO: No | EVID ANG | ela Moore, R o | in [004028] | | |
| SIGNATURE: | | | OURT, CITIZEN, DIS - RECEIPT - | | |
| PRINT NAME: | | | | | |
| | P#: | + 2 | | | |
| STREET: | Person removing iten identification of the h | (s) will either retur | CITY: | | ZIP: |

JAT MARINE

I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Sugana S. McCurdy Director, Police Records Bureau Records Custodian

| Las Vegas Metropolitan Police | e Department | PROPERTY WITHDRAWAL RECEIPT PAGE 1 DATE 06-12-2012 | | | | |
|--|----------------------------------|---|-----------------------------|--|----------------------|--|
| PROPERTY BURE | AU | | | | E 08:38:51 AM | |
| ITEM IN | FORMATIC | N | | DESCRIPTION | s | |
| AC# 08031650 | Item | | | | | |
| CS# EV# 0805161021 | Qty | 1 UNCLASS | | SEXUAL ASSAULT KIT CAGNINA, | \$0.00 | |
| | Flags | VAC U ADD | \$ | ROXANNE | AMEINENTIA | |
| AC# 08031650 | Item | 1.8 | <u>x</u> | I ARAM ARMID ZUM KATAR JUM ARMA ANN ANN ANN ANN ANN ANN ANN ANN ANN A | <u> YVIVEINCIVIA</u> | |
| CS# | Qty | 1 | | | \$0.00 | |
| EV# 0805161021 | | UNCLASS | | DNA EXTRACT JM-111 FROM BREAST SWAB IN S/AKIT OF ROXANNE CAGNINA | | |
| | Flags | | ☆ | SWAD IN S/ARTI OF ROXANNE CAGNINA | | |
| AC# 08031650 | ltem | 1B | | | | |
| CS# | Qty | 1 | | DNA EXTRACT JM -112 FROM THIGH | \$0.00 | |
| EV# 0805161021 | | UNCLASS | í | SWAB IN S/AKIT OF ROXANNE CAGNINA | | |
| | Flags | | | | | |
| AC# 08031650 CS# | Item Qty | 1C 1 | | | | |
| EV# 0805161021 | | UNCLASS | | DNA EXTRACT | \$0.00 | |
| | Flags | | \$ | RBQ - 120511-JM2 | | |
| AC# 08031765 | Item | 5 λ | | A I TA'NA ANI AT IND ATAIND TETTA ANG INTITA ANG INTITA ANG ATITA AN ATAI | | |
| CS# F | Qty | 1 | | DNA EXTRACT JM -2 FROM BUCCAL | \$0.00 | |
| EV# 0805161021 | •• | UNCLASS | | SWAB KIT OF STEVEN FARMER | | |
| | Flags | | 愛 | Pkg/ltm: 2/5 Sec Bg: 2/5 | | |
| AC# 08031765 | Item | 5B | ···· | | | |
| CS# F | Qty | 1 | | | \$0.00 | |
| EV# 0805161021 | Туре | UNCLASS | | DNA EXTRACT OF RBK - 120711-JM FROM BUCCAL SWAB KIT OF STEVEN FARMER | | |
| | Flags | | 愛 | Pkg/Itm: 2/5 | | |
| ······································ | | | | Sec Bg: 2/5 | | |
| | | | | MONEY TOTA | L \$0.00 | |
| RECEIVED FROM EVIDENCE REASON PROPERTY IS BEING OFFICER RECEIVING OFFICE | | EVID ANG | | DRE, FOR [004028] | | |
| OFFICER RECEIVING ITEMS | INATURE: | les red | erf / | NOVI | | |
| PHOTO: No EVID ANGELA MOORE, FOR [004028] | | | | | | |
| | T | URNED OVE | ER TO CO | OURT, CITIZEN, DISTRICT | | |
| • • | | • | | - RECEIPT - | | |
| SIGNATURE: | | | | DATE: | | |
| | | | | | | |
| RANK: | P#; | | | AGENCY: | | |
| STREET: | | - | | <i>CITY: ST: Z</i> | 1 | |
| INSTRUCTIONS: | erson removin dentification o | ig item(s) will eit f the individual i | ther return receiving th | n the ltem(s) or return an executed copy of the receipt bearing he ltem(s) within 5 days. | | |

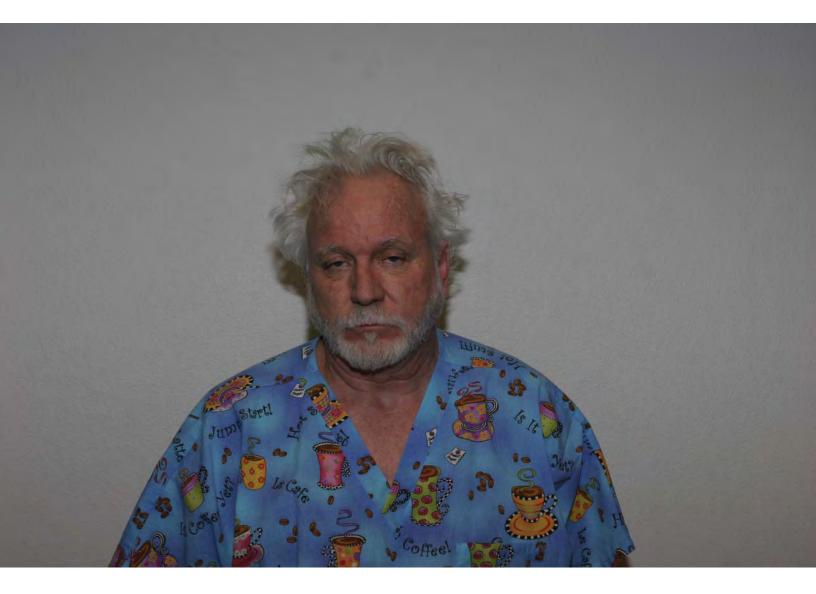
Int Hills Harry

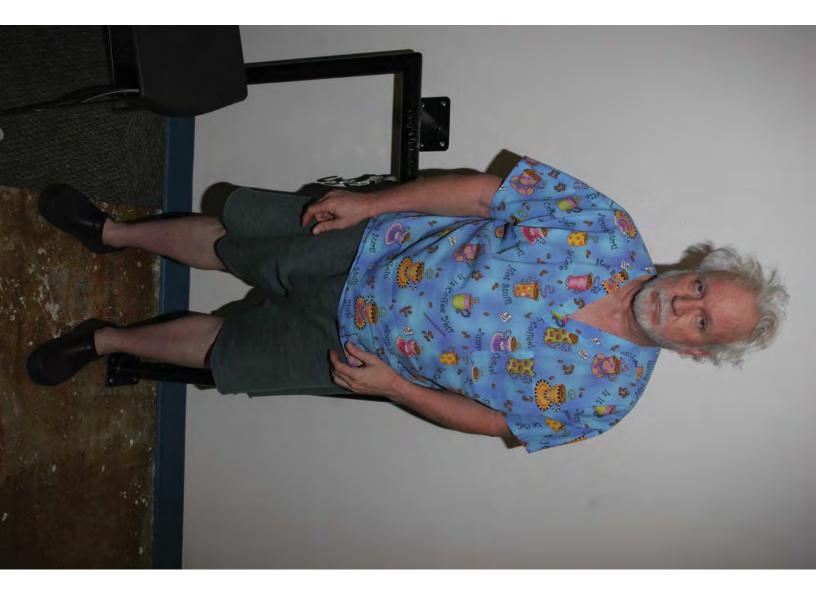
I hereby certify this is a full, true and correct copy of the: ORIGINAL DOCUMENT (HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department. Surgana S. McCurdy Director, Police Records Bureau Records Custodian

TAB 36

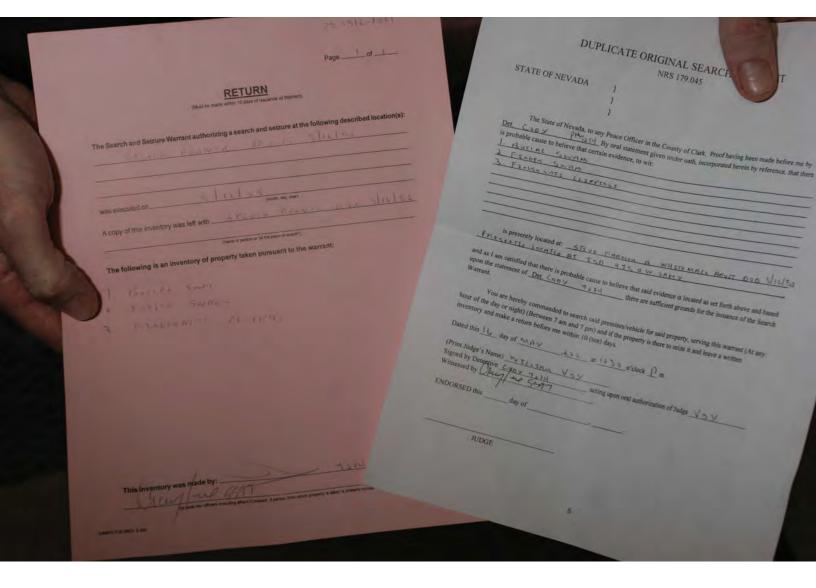




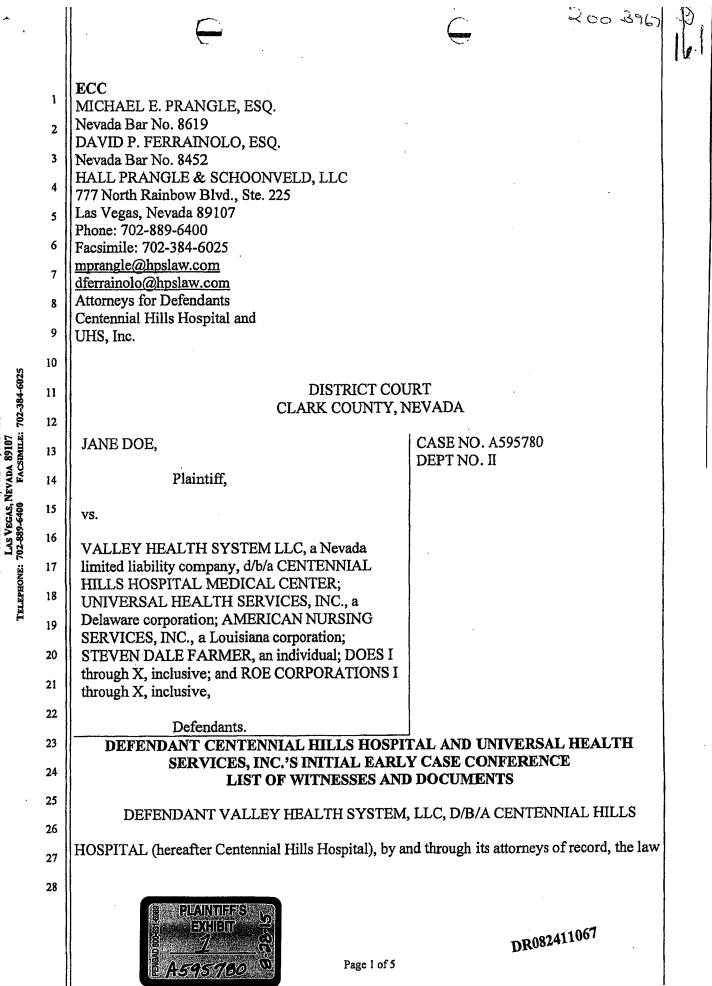








TAB 37



HALL PRANGLE (HOONVELD, LLC RAINBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD, STE. 225 LAS VEGAS, NEVADA 89107 I LAS VEGAS, NEVADA 89107 I ELEPHONE: 702-889-6400 FACSIMILE: 702-384-602

| 1 | firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its NRCP 16.1 List of |
|----------|---|
| 2 | Witnesses and Documents as follows: |
| 3 | I. |
| - 4 | WITNESSES |
| 5 | |
| 6 | 1. Jane Doe |
| 7 | c/o Robert E. Murdock, Esq. Murdock & Associates, Chtd. |
| 8 | 520 South Fourth Street Las Vegas, Nevada 89101 |
| 9 | Jane Doe is expected to testify as to the facts and circumstances surrounding this matter |
| 10 | and her alleged damages. |
| 11 12 | 2. Jane Doe's two sons |
| 12 | Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding |
| 14 | this matter, their mother's alleged damages and conversations they had with their mother about the incident. |
| 15 | 3. Steven Dale Farmer |
| 16 | c/o Robert C. McBride, Esq. |
| | Nevada Bar No. 7082 Mandelbaum Schwarz Ellerton & McBride |
| 17 . | 2012 Hamilton Lane |
| 18 | Las Vegas, Nevada 89106 |
| 19 | Mr. Farmer is expected to testify as to the facts and circumstances surrounding this |
| . 20 | matter and the allegations made against him. |
| 21 | 4. Debra Scott, MSN, RN, FRE Executive Director |
| 22 | Nevada State Board of Nursing |
| 23 | 5011 Meadowwood Mall Way |
| 24 | Suite 300 Reno, Nevada 89502-6567 |
| 25 | Ms. Scott is expected to testify regarding The certification process, background check |
| 26 | and investigation performed by the Nevada Board of Nursing prior to certification. The |
| 27 | Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing |
| 28 | prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). |
| | Page 2 of 5 |
| | |

* .

HALL PRANGLE & SCHOONVELD, LLC RAUNBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD., STE. 225 LAS VEGAS, NEVADA 89107 TELEPHONE: 702-889-6400 FACSIMILIE: 702-384-6025

÷.,

AA2251

| 1 | 5. Michael Egstad, Manager I Licensing and Certification Program |
|--------|--|
| 2 | California Department of Public Health (CDPH) |
| 3 | ATCS - MS 3301 P.O. Box 997416 |
| 4 | 1615 Capitol Avenue |
| 5 | Sacramento, CA 95899-7416 |
| 6 | Mr. Egstad is expected to testify regarding The certification process, background check |
| 6 7 | and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. |
| 8 | Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number |
| 9 | 00199703, Nurse Assistant Certificate 00659300). |
| 10 | 6. Collado Jeunnesse, RN Kim Moon, RN |
| 11 | Abraham Deppa, CNA |
| 12 | Nikki Carter, CNA Marina McDowell, CNA |
| 13 | Alana Schons, CNA |
| | Nelina Arante, RN |
| 14 | Ronald Lodevico Venise Abelard, CNA |
| 15 | Paula Mosley, RN |
| 16 | Pamela Fiagg, CNA |
| 17 | Amber Vergara Loretta Korinis |
| 18 | Michelle Lucas |
| 19 | The above identified nurses and certified Nurses' Assistants are expected to testify as to |
| 20 | the care and treatment rendered as well as the facts and circumstances surrounding this matter. |
| 21 | 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. |
| 22 | James E. Mock, M.D. |
| 23 | The above identified physicians are expected to testify as to the care and treatment |
| 24 | rendered as well as the facts and circumstances surrounding this matter. |
| 25 | 8. Employees, former employees, representatives |
| 26 | of and former representatives of American Nursing Services, Inc., |
| 27 | c/o Lewis Brisbois Bisgaard & Smith |
| 28 | 400 South Fourth Street Suite 500 Las Vegas, Nevada 89101 |
| | |

Page 3 of 5

HALL PRANGLE CONVELD, LLC RAINBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD., STE. 225 LAS VEGAS, NEVADA 89107 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

*

7

18.17

The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 9. Defendant reserves the right to supplement its list of witnesses.
- 10. Defendant reserves the right to call any witnesses identified by any other parties in this litigation.

II. DOCUMENTS

- 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on attached CD).
- Centennial Hills Hospital Daily Security Logs
 Bates Numbered SDAL 000001 001421 (Exhibit B on attached CD).
- 3. Records produced by Nevada State Board of Nursing (Exhibit C on attached CD).
- Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD).
- 5. Defendant reserves the right to supplement this list of documents.
- 6. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation.

Dated this $\underline{\mathcal{H}}$ day of November, 2009.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FACSIMILE: 702-384-6025

777 NORTH RAINBOW BLVD., STE. 225

LAS VEGAS, VELEPHONE: 702-889-6400

RAINBOW CORPORATE CENTER

CHOONVELD, LL(

HALL PRANGLE

HALL PRANGLE & SCHOONVELD, LLC

By:

MICHAEL E. PRANCLE, ESQ. Nevada Bar No. 8619 DAVID P. FERRAINOLO, ESQ. Nevada Bar No. 8452 777 North Rainbow Blvd., Ste. 225 Las Vegas, Nevada 89107 Attorneys for Defendant Centennial Hills Hospital

| | | $\overline{\mathbf{C}}$ | | |
|---------|--|--|--|--|
| 1 | CERTIFICATE OF SERVICE | | | |
| 2 | I HEREBY CERTIFY that I am an employe | e of HALL PRANGLE & SCHOONVELD, | | |
| 3 | LLC; that on the day of November, 2009, I ser | ved a true and correct copy of the foregoing | | |
| 4 | DEFENDANT CENTENNIAL HILLS HOSPIT | | | |
| 5 | SERVICES, INC.'S INITIAL EARLY CASE CO | | | |
| 6 | | | | |
| 7 | AND DOCUMENTS in a sealed envelope, via US | Mail, first class postage pre-paid to the | | |
| 8 | following parties at their last known address: | | | |
| 9 10 | Robert E. Murdock, Esq. | Sckley M. Keach, Esq. | | |
| 11 | Murdock & Associates, Chtd. | Eckley M. Keach, Chtd. | | |
| 12 | Las Vegas, Nevada 89101 | 20 South Fourth Street as Vegas, Nevada 89101 | | |
| 13 | | ttorneys for Plaintiffs | | |
| 14 | | lobert C. McBride, Esq. Ievada Bar No. 7082 | | |
| 15 | 400 South Fourth Street, Ste. 500 N | Iandelbaum Schwarz Ellerton & McBride | | |
| 16 | | 012 Hamilton Lane as Vegas, Nevada 89106 | | |
| 17 | A | ttorneys for Defendant teven Dale Farmer | | |
| 18 | $\land \land \land$ | \bigcirc (\neg | | |
| 19 | - fuele | and genaliske | | |
| 20 | An employee of HAL | PRANGLE & SCHOONVELD, LLC | | |
| 21 | | | | |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |
| 26 | | | | |
| 27 | | | | |
| 20 | | | | |
| | | | | |
| | Page 5 of 5 | | | |
| | | | | |

HALL PRANGLE C. CHOONVELD, LLC RAINBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD, STE 225 LAS VECAS, NEVADA 89107 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

)

٠

. 24 -

•

TAB 38

| | KHIBIT FORM | | | | |
|---|--------------------------------------|----------|--------|------|-------------|
| CASE NO. A 595780 | TRIAL DATE: 11-9- | 09 | | _ | |
| DEPT. NO | JUDGE: Valarie | Veg | ya | | |
| Jane Doe | CLERK: NORA PEÑ | A | | | |
| | REPORTER: Lisa | Lizot | te | | |
| PLAINTIFF, VS | Robert Merco COUNSEL FOR PLAINTIF | lock | | _ | |
| 100 1 10 1- 10 | | | | | |
| Valley Health System LLC et al DEFENDANT | COUNSEL FOR DEFENDA | ANT / | ent Vs | ge | K |
| OUT of the | | | | DMIT | |
| Pltf's Exhibit 1. Photo & Universal Health S | | DATE 4/g | OBJ | 1 | DATE N/g |
| 1. Photo of Universal Health = | sives address | 19 | V | - | 1109 |
| | | - | - | - | |
| * | | - | | - | |
| | | | | - | |
| | | | | - | |
| | | | | - | |
| | | | | | |
| | | | + | | - |
| | | | | | |
| | | | | | |
| | | | | | |
| | -de - | | | 1 | |
| | | | | - | |
| | | | | +- | |
| | | | | | |
| | | | | | _ |

ult Exhibit Form 5-01/jh

PLAZA WEST

Universal Health Srvcs.

MARKED FOR IDENTIFICATION

CASE

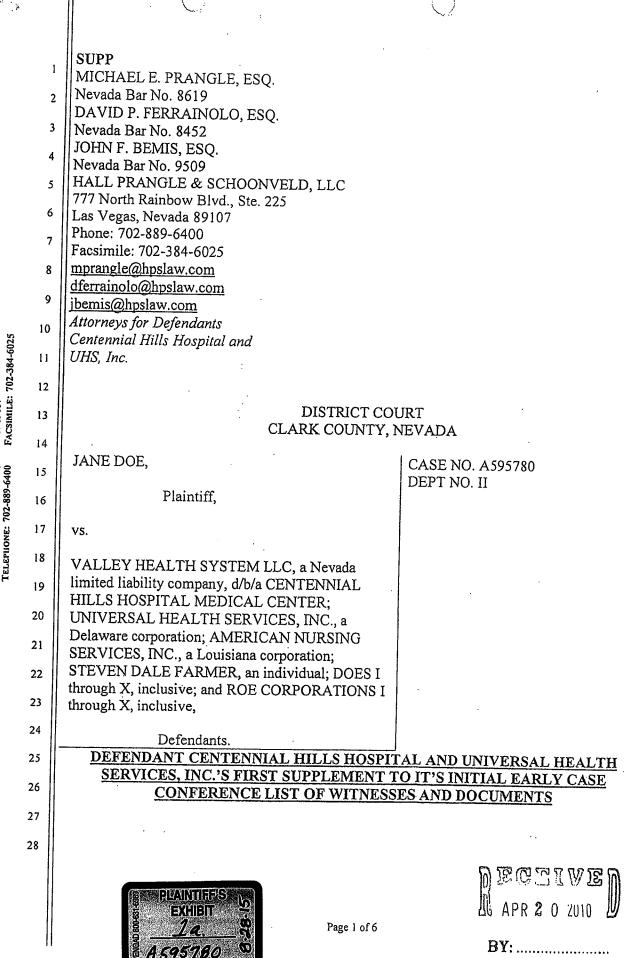
PROF

EN GAD-E

PLAINTIFF'S

EXHIBIT

TAB 39



HALL PRANGLE & MOONVELD, LLC Imainbow corforate center 777 North Rainbow BLVD., STE, 225 Las Vegas, Nevada 89107 'Elefuone: 702-889-6400 FACSMILE, 702-384-6703

AA2257

| | | \bigcirc | | \bigcirc | | |
|----|----------------------------------|---|-----------------------------------|-------------|---------------------|----------------|
| 1 | DEFENI | DANT VALLEY | HEALTH SYSTEM | , LLC, D |)/B/A CENTEN | NIAL HILLS |
| 2 | HOSPITAL (her | eafter Centennial H | Hills Hospital), by and | through | its attorneys of re | ecord, the law |
| 3 | | | HOONVELD, LLC, | | | |
| 4 | | ocuments as follow | | | | |
| 5 | | ocuments as tonow | | | | |
| 6 | | | I. | | | |
| 7 | | | <u>WITNESSES</u> | | | |
| 8 | | ~ | | | | r. |
| 9 | c/c | ne Doe 9 Robert E. Murdoo | | | | |
| 10 | | urdock & Associate 0 South Fourth Stre | | | | |
| 11 | | s Vegas, Nevada 8 | | | | |
| 12 | | | fy as to the facts and | circumst | ances surroundin | g this matter |
| 13 | and her alleged da | amages. | | | | |
| 14 | 2. Jar | ne Doe's two sons | | | | |
| 15 | Jane Doe' | s two sons are expe | ected to testify as to t | he facts ar | nd circumstances | surrounding |
| 16 | this matter, their the incident. | mother's alleged d | amages and conversa | tions they | had with their r | nother about |
| 17 | | ven Dale Farmer | | | | |
| 18 | · c/o | Robert C. McBrid | e, Esq. | | | |
| 19 | | vada Bar No. 7082 ndelbaum Schwarz | Ellerton & McBride | | | |
| 20 | | 2 Hamilton Lane Vegas, Nevada 89 | 106 | | | |
| 21 | | - | | | | |
| 22 | Mr. Farme matter and the alle | er is expected to to the gations made again | estify as to the fact 1st him. | s and cire | cumstances surro | ounding this |
| 23 | 4. Del | ora Scott, MSN, RI | I FPF | | | |
| 24 | Exe | ecutive Director | | | | |
| 25 | | vada State Board of 1 Meadowwood M | 5 | | | |
| 26 | Sui | te 300 10, Nevada 89502-6 | | | | |
| 27 | | io, 1907aua 07002-(| 1001 | | | |
| 28 | (| | | | | |
| | | | | | | |

÷

ر^{. *}

4

HALL PRANGLE & HOONVELD, LLC RAINBOW CORFORATE CENTER 777 NORTH RAINBOW BLVD, STE. 225 LAS VECAS, NEVADA 89107 TELEPHIONE: 702-889-6400 FACSIMILE: 702-384-6025

•

.

-tipe-

AA2258

Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 5. Michael Egstad, Manager I

Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

 Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D.

James E. Mock, M.D.

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

28

 5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

| | | O . O |
|---------------------------------|---------------------|---|
| 1 2 3 4 5 6 7 | testify in regardle | Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., c/o Lewis Brisbois Bisgaard & Smith 400 South Fourth Street Suite 500 Las Vegas, Nevada 89101 bove described witnesses are expected to be identified during discovery and to ards to all facts and circumstances surrounding Steven Farmer and the incident in huding but not limited to investigations performed, background checks performed ven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| 8 | 9. | Defendant reserves the right to supplement its list of witnesses. |
| 9 10 | 10. | Defendant reserves the right to call any witnesses identified by any other parties in this litigation. |
| 11 | | Π. |
| 12 | | DOCUMENTS |
| .3 | 1. | Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on attached CD). |
| 14 15 | 2. | Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on attached CD). |
| 6 7 | 3. | Records produced by Nevada State Board of Nursing (Exhibit C on attached CD). |
| 18 19 | 4. | Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD). |
| 20 21 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E attached hereto) |
| 22 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 - |
| 23 24 | | 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F attached hereto) |
| 25 26 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G attached hereto) |
| 27 | | (BAMOR & attached nor cro) |
| 28 | | |

Page 4 of 6

*n j

۰ ۱

Ŷ

and the second s

| ۰ ۴ | | \bigcirc \bigcirc |
|---|--------|---|
| | | |
| | 1 2 | 8. Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 - 000003 (Exhibit H attached hereto) |
| | 3 4 | 9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I attached hereto) |
| | 5 6 | 10. Defendant reserves the right to supplement this list of documents. |
| | 7 | 11. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation. |
| | 8 | DATED this 16 th day of April, 2010. |
| | 9 | |
| C) % | 10 | HALL PRANGLE & SCHOONVELD, LLC |
| HOONVELD, LLC Recenter BLVD, STE, 225 Add 89107 Facsimile: 702-384-6025 | 11 | \sim - |
| ELD, sr 225 1 225 | 12 | By |
| RANGLE & HOONVELI RAINBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD., STE. 225 Las Vecas, Nevada 89107 E: 702-889-6400 Facsimile: 70: | 13 | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 |
| HO M BLV V BLV FAC | 14 | DAVID P. FERRAINOLO, ESQ. |
| CORPC CORPC AINBO AINBO 400 | 15 | Nevada Bar No. 8452 JOHN F. BEMIS, ESQ. |
| LL PRANGLE & RAINBOW COH 777 NORTH RAIN LAS VEGAS, PHONE: 702-889-6400 | 16 | Nevada Bar No. 9509 |
| RAN 177 NO 117 NO 11 | 17 | 777 North Rainbow Blvd., Ste. 225 Las Vegas, Nevada 89107 |
| LLL I | 18 | Attorneys for Defendant Centennial Hills Hospital and UHS, Inc. |
| HA | 19 | Cemenniai Iniis Itospiai ana 0116, me. |
| | 20 | · · · · |
| | 21 | |
| | 22 | |
| | 22 | |
| | | |
| | 24 | |
| | 25 | |
| | 26 | |
| | 27 | |
| Ĵ | 28 | |
| | | Page 5 of 6 |

..

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 16th day of April, 2010, I served a true and correct copy of the foregoing DEFENDANT CENTENNIAL HILLS HOSPITAL AND UNIVERSAL HEALTH SERVICES, INC.'S FIRST SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS in a sealed envelope, via US Mail, first class postage pre-paid to the following parties at their last known address:

Robert E. Murdock, Esq. Murdock & Associates, Chtd. 520 South Fourth Street Las Vegas, Nevada 89101 Attorneys for Plaintiff

Brent Vogel, Esq. Lewis Brisbois Bisgaard & Smith 400 South Fourth Street, Ste. 500 Las Vegas, Nevada 89101 Attorneys for American Nursing Services, Inc. Eckley M. Keach, Esq. Eckley M. Keach, Chtd. 520 South Fourth Street Las Vegas, Nevada 89101 Attorneys for Plaintiffs

Robert C. McBride, Esq. Nevada Bar No. 7082 Mandelbaum Schwarz Ellerton & McBride 2012 Hamilton Lane Las Vegas, Nevada 89106 Attorneys for Defendant Steven Dale Farmer

An employee of HALL PRANGLE & SCHOONVELD, LLC

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

TAB 40

| Imited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. <u>DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI</u> HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN | | Ö | Ú | | | |
|---|----------------------------|--|---------------------------------------|--|--|--|
| 11 CLARK COUNTY, NEVADA 12 JANE DOE, 13 JANE DOE, 14 Plaintiff, 15 vs. 16 VALLEY HEALTH SYSTEM LLC, a Nevada 17 limited liability company, db/a CENTENNIAL 18 UNIVERSAL HEALTH SERVICES, INC., a 19 Delaware corporation; AMERICAN NURSING 20 STEVEN DALE FARMER, an individual; DOES I 11 through X, inclusive; and ROE CORPORATIONS I 21 through X, inclusive, 22 Defendants. 23 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL 24 HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S 25 EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM 26 DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN 27 HOSPITAL MEDICAL CENTER' (hereafter Centennial Hills Hospital), by ar 28 FEB 1 4 2013 | 3 4 5 6 7 8 | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 HALL PRANGLE & SCHOONVELD, LLC 777 North Rainbow Blvd., Ste. 225 Las Vegas, Nevada 89107 Phone: 702-889-6400 Facsimile: 702-384-6025 <u>mprangle@hpslaw.com</u> <u>jbemis@hpslaw.com</u> <u>Attorneys for Defendant</u> Valley Health System, LLC d/b/a | · · · · · · · · · · · · · · · · · · · | | | |
| VS. VALLEY HEALTH SYSTEM LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. Defendants. DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar FEB 1 4 2013 | | DISTRICT COU | JRT | | | |
| VS. VALLEY HEALTH SYSTEM LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. Defendants. DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar FEB 1 4 2013 | 19-48 11 | | | | | |
| VS. VALLEY HEALTH SYSTEM LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar FEB 1 4 2013 | 12 12 | | | | | |
| VS. VALLEY HEALTH SYSTEM LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar FEB 1 4 2013 | 13 | | | | | |
| Imited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. <u>DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI</u> HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN | | Plaintiff, | | | | |
| Imited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, Defendants. <u>DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI</u> HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN | | VS. | | | | |
| Defendants. 23 24 25 26 26 27 28 | 17 18 18 19 20 | limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I | | | | |
| DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAI HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUM DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar CENTRAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar FEB 1 4 2013 | 22 | Defendants. | | | | |
| 26 DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTEN 27 HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar 28 FEB 1 4 2013 | 24 | HOSPITAL MEDICAL CENTER'S SECOND | SUPPLEMENT TO IT'S INITIAL | | | |
| 27 HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital), by ar 28 Image: Comparison of the second sec | | | | | | |
| 28 RUAINTIFES D FEB 1 4 2013 | | | | | | |
| Page 1 of 6 | | Page 1 of 6 | DECENTER | | | |

HALL PRANGLE & doonveld, LLC rainbow corporate center 777 north rainbow blvd, ste. 225 Las vecas, nevada 89107 Telephone: 702-889-6400 Facsimile: 702-884-6025

| /

)

| 1 | attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits | 2 |
|----|--|---|
| 2 | its Second Supplement to its NRCP 16.1 List of Witnesses and Documents as follows | |
| 3 | (supplements provided in bold): | |
| 4 | I. | |
| 5 | | |
| 6 | WITNESSES | |
| 7 | | |
| 8 | 1. Jane Doe c/o Robert E. Murdock, Esq. | |
| 9 | Murdock & Associates, Chtd. 520 South Fourth Street | |
| 10 | Las Vegas, Nevada 89101 | |
| 11 | Jane Doe is expected to testify as to the facts and circumstances surrounding this matter | |
| 12 | and her alleged damages. | |
| 13 | 2. Jane Doe's two sons | |
| 14 | Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding | |
| 15 | this matter, their mother's alleged damages and conversations they had with their mother about the incident. | |
| 16 | 3. Steven Dale Farmer | |
| 17 | c/o Robert C. McBride, Esq. | |
| 18 | Nevada Bar No. 7082 Mandelbaum Schwarz Ellerton & McBride | |
| 19 | 2012 Hamilton Lane Las Vegas, Nevada 89106 | |
| 20 | Mr. Farmer is expected to testify as to the facts and circumstances surrounding this | 9 |
| 21 | matter and the allegations made against him. | |
| 22 | 4. Debra Scott, MSN, RN, FRE | |
| 23 | Executive Director | - |
| 24 | Nevada State Board of Nursing 5011 Meadowwood Mall Way | |
| 25 | Suite 300 Reno, Nevada 89502-6567 | |
| 26 | | |
| 27 | Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. The | q |
| 28 | Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA | ١ |
| | | |

•

HALL PRANGLE & CONVELD, LLC RAINBOW CORFORATE CENTER 777 NORTH RAINBOW BLVD., STE. 225 LAS VECAS, NEVADA 89107 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

÷.,

Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

5. Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

FACSIMILE: 702-384-6025 HALL PRANGLE & AOONVELD, LLC AINBOW CORPORATE CENTER LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 1

2

3

4

5

6

7

8

9

10

11

12

13

14

24

25

26

27

28

6.

15 16 17 18 19 20 The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. 21 22 7. 23

Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D.

Collado Jeunnesse, RN

Abraham Deppa, CNA

Marina McDowell, CNA

Nikki Carter, CNA

Alana Schons, CNA

Venise Abelard, CNA Paula Mosley, RN

Pamela Flagg, CNA

Amber Vergara Loretta Korinis

Michelle Lucas

Nelina Arante, RN Ronald Lodevico

Kim Moon, RN

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

Employees, former employees, representatives 8. of and former representatives of American Nursing Services, Inc.,

| 1 | | c/o Lewis Brisbois Bisgaard & Smith 400 South Fourth Street Suite 500 Las Vegas, Nevada 89101 |
|-----------------------|-----------------|--|
| 3 | The al | pove described witnesses are expected to be identified during discovery and to |
| 4 | testify in rega | rds to all facts and circumstances surrounding Steven Farmer and the incident in uding but not limited to investigations performed, background checks performed |
| 5 | regarding Stev | ven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| 6 | 9. | Defendant reserves the right to supplement its list of witnesses. |
| 7 8 | 10. | Defendant reserves the right to call any witnesses identified by any other parties in this litigation. |
| 9 | | II. |
| 10 | | DOCUMENTS |
| 11 | 1. | Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD). |
| 12 13 | 2. | Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD). |
| 14 15 | 3. | Records produced by Nevada State Board of Nursing (Exhibit C on CD). |
| 16 17 | 4. | Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD). |
| 18 [.] 19 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
| 20 21 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 |
| 22 | | (Exhibit F) |
| 23 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 |
| 24 | | (Exhibit G) |
| 25 | 8. | Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 |
| 26 27 | | (Exhibit H) |
| 28 | | |
| | | |
| | | |
| | | Page 4 of 6 |

L

.

.

HALL PRANGLE & AOONVELD, LLC RAINBOW CORPORATE CENTER 777 NORTH RAINBOW BLVD., STE. 225 LAS VEZAS, NEVADA 89107 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

| e | | |
|---|-------------|--|
| | 1 | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| | 2 3 4 | 10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J attached hereto) 11. Schedule of Steven Dale Farmer at Centennial Hills Hospital from |
| | 5 6 | April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K attached hereto) |
| | 7 8 | 12. Defendant reserves the right to supplement this list of documents. |
| | 9 | 13. Defendant reserves the right to utilize any document utilized or identified by any |
| 25 C | 10 | other party to this litigation. |
| HOONVELD, LLC AATE CENTER V BLVD, STE. 225 VADA 89107 FACSIMILE: 702-384-6025 | 11 12 | DATED this 12 th day of February, 2013. HALL RRANGLE & SCHOONVELD, LLC |
| DONVE HOONVE TE CENTER LUD, STE. 2 DA 89107 ACSIMILE: 7 | 13 | INALE NICKOLL & BEHOORVELD, BLC |
| BOW NEV. | 14 15 | By: MICHAELE. PRANGLE, ESQ. |
| ANGLE & Rainbow cof i north rain Las Vegas, 702-889-6400 | 16 | Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. |
| | 17 | Nevada Bar No. 9509 777 North Rainbow Blvd., Ste. 225 |
| HALL PF 77 Telephone: | 18 | Las Vegas, Nevada 89107 Attorneys for Defendant |
| | 19 20 | Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center |
| | 21 | |
| | 22 | |
| | 23 | |
| | 24 25 | |
| | 26 | |
| | 27 | |
| ý ý | 28 | |
| | | Page 5 of 6 |

.

CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 12th day of February, 2013, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via facsimile and in a 7 sealed envelope, via US Mail, first class postage pre-paid to the following parties at their last 8 9 known address: 10 Robert E. Murdock, Esq. Eckley M. Keach, Esq. Murdock & Associates, Chtd. Eckley M. Keach, Chtd. 11 520 South Fourth Street 520 South Fourth Street 12 Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 Attorneys for Plaintiff Attorneys for Plaintiffs 13 14 S. Brent Vogel, Esq. Robert C. McBride, Esq. MANDELBAUM ELLERTON & LEWIS BRISBOIS BISGAARD & SMITH 15 6385 South Rainbow Blvd., Suite 600 MCBRIDE Las Vegas, NV 89118 2012 Hamilton Lane 16 Las Vegas, Nevada 89106 Attorneys for Defendant Attorneys for Defendant 17 American Nursing Services, Inc. Steven Dale Farmer 18 19 An employee of HALL PRANGLE & SCHOONVELD, LLC 20 21 4833-7222-7858, v. 1 22 23 24 25 26 27 28

 \sim

.

.

TAB 41

| | | , |
|----|--|---|
| | at the second se | |
| 1 | SUPP MICHAEL E. PRANGLE, ESQ. | |
| 2 | Nevada Bar No. 8619 | · · · · · · · · · · · · · · · · · · · |
| 2 | JOHN F. BEMIS, ESQ. | · · · · · · · · · · · · · · · · · · · |
| 3 | Nevada Bar No. 9509 | |
| 4 | HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 | |
| 5 | Las Vegas, NV 89144 | · · · · |
| 5 | Phone: 702-889-6400 | |
| 6 | Facsimile: 702-384-6025 | |
| 7 | mprangle@hpslaw.com jbemis@hpslaw.com | |
| 8 | Attorneys for Defendant | |
| | Valley Health System, LLC d/b/a | · |
| 9 | Centennial Hills Hospital Medical Center | |
| 10 | DISTRICT CO | URT |
| 11 | | |
| | CLARK COUNTY, | NEVADA |
| 12 | | CASE NO. A595780 |
| 13 | JANE DOE, | DEPT NO. II |
| 14 | Plaintiff, | |
| | | · · · · · · · · · · · · · · · · · · · |
| 15 | vs. | |
| 16 | VALLEY HEALTH SYSTEM LLC, a Nevada | |
| 17 | limited liability company, d/b/a CENTENNIAL | |
| 10 | HILLS HOSPITAL MEDICAL CENTER; | |
| 18 | UNIVERSAL HEALTH SERVICES, INC., a | |
| 19 | Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; | |
| 20 | STEVEN DALE FARMER, an individual; DOES I | |
| 1 | through X, inclusive; and ROE CORPORATIONS I | |
| 21 | through X, inclusive, | |
| 22 | Defendants. | |
| 23 | | - |
| 24 | DEFENDANT VALLEY HEALTH SYSTEM | I, LLC d/b/a CENTENNIAL HILLS |
| | HOSPITAL MEDICAL CENTER'S THIRD EARLY CASE CONFERENCE LIST OF V | SUPPLEMENT TO IT'S INITIAL WITNESSES AND DOCUMENTS |
| 25 | | |
| 26 | DEFENDANT VALLEY HEALTH SYST | EM, LLC, d/b/a CENTENNIAL HILLS |
| 27 | HOSPITAL MEDICAL CENTER (hereafter Cente | nnial Hills Hospital), by and through its |
| 28 | | MECENVEM |
| | | |
| | BE PLAINTIFF'S TO | MAR 1 8 2013 |
| | EXHIBIT Page 1 of 6 | |
| | | By |
| | E A 595780 S | |

HALL PRANGLE & CONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

 $\left(\right)$

ÿ

ç .

AA2270

| ۰. | | |
|---|----------|--|
| Ó | | C I I I C CILLE DE ANOLE & COMONNEL D. L.C. hereby submits |
| 12 | 1 | attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits |
| | 2 | its Third Supplement to its NRCP 16.1 List of Witnesses and Documents as follows |
| | 3 | (supplements provided in bold): |
| | 4 | I. |
| | 5 | WITNESSES |
| | 6 | |
| | 7 | 1. Jane Doe |
| | 8 | c/o Robert E. Murdock, Esq. Murdock & Associates, Chtd. |
| | 9 | 520 South Fourth Street Las Vegas, Nevada 89101 |
| LC 6025 | 10 | Jane Doe is expected to testify as to the facts and circumstances surrounding this matter |
| LD, LLC ve 702-384-6025 | 11 12 | and her alleged damages. |
| | 12 | 2. Jane Doe's two sons |
| HOONVE HOONVE Center Dru 00 Ada 89144 Facsimile: | 14 | Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding |
| & SC TOWN SUITE 2 NEV | 15 | this matter, their mother's alleged damages and conversations they had with their mother about the incident. |
| RANGLE & 160 North To Sui Las Vegas, : 702-889-6400 | 16 | |
| PRAN 1160 T La U: 702 | 17 | 3. Steven Dale Farmer c/o Robert C. McBride, Esq. |
| ALL PR 11 LEPHONE: | 18 | Nevada Bar No. 7082 Mandelbaum Schwarz Ellerton & McBride |
| H B | 19 | 2012 Hamilton Lane Las Vegas, Nevada 89106 |
| | 20 | |
| | 21 | Mr. Farmer is expected to testify as to the facts and circumstances surrounding this matter and the allegations made against him. |
| | 22 | 4. Debra Scott, MSN, RN, FRE |
| | 23 | Executive Director Nevada State Board of Nursing |
| | 24 | 5011 Meadowwood Mall Way |
| | 25 | Suite 300 Reno, Nevada 89502-6567 |
| | 26 | Ms. Scott is expected to testify regarding The certification process, background check |
| 1754. | 27 | and investigation performed by the Nevada Board of Nursing prior to certification. The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA |
| | 28 | |
| | | |
| | | Page 2 of 6 |
| | | 11 · · · · · · · · · · · · · · · · · · |

• / \ \

рт.) |Т.) |

| Certificate (CNA021509). Investigation of Steven Dale Farmer by the Newar prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 5. Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certificat Nurses Assistant. The Certification Process for a Certificate Nurse Assistant. The Certification Process for a Certificate Nurse Assistant Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons; CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expethe care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour of a different representatives of and former representatives of American Nursing Services, Inc., | | \sim | |
|---|---------------------|--|---|
| prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 5. Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification Pr Parmer (Home Health Certificate Number 00199703, Nurse Assistant Ce Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons', CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Armber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surroun 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surround of and former representatives of American Nu de Guerie Iare | da Board of Nursir | on of Steven Dale Farmer by the Nevada B | wifests (CNA021500) Investig |
| Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification process for a Certificate Number 00199703, Nurse Assistant Ce Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons', CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour of and former representatives of American | | ner's CNA certificate (CNA021509). | ior to revocation of Steven Dale Fa |
| California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification Pr Farmer (Home Health Certificate Number 00199703, Nurse Assistant Cer Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour 8. Employees, former employees, representatives of and former representatives of American | | - | U . |
| P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification Pr Farmer (Home Health Certificate Number 00199703, Nurse Assistant Ce Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour 8. Employees, former employees, representatives of and former representatives of American | | | California Departme |
| Sacramento, CA 95899-7416 Mr. Egstad is expected to testify regarding The certification process and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification Pr Farmer (Home Health Certificate Number 00199703, Nurse Assistant Cer Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons', CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrourding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | P.O. Box 997416 |
| and investigation performed by the California Board of Nursing prior to CN. Certification Process for a Certified Nurses Assistant. The Certification Pr Farmer (Home Health Certificate Number 00199703, Nurse Assistant Cere Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expetite care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | 9-7416 | - |
| Certification Process for a Certified Nurses Assistant. The Certification Pr Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expect the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour 8. Employees, former employees, representatives of and former representatives of American | s, background chec | tify regarding The certification process, ba | Mr. Egstad is expected to t |
| Revocation of Steven Dale Farmer's CNA Certificate (Home Health 00199703, Nurse Assistant Certificate 00659300). 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons; CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expetite care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | rocess for Steven I | Nurses Assistant. The Certification Proces | Certification Process for a Certified |
| 6. Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | Certificate Number | 's CNA Certificate (Home Health Cert | levocation of Steven Dale Farm |
| Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA. Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expetite care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | |
| Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrour 8. Employees, former employees, representatives of and former representatives of American | | | |
| Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surroun 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surround 8. Employees, former employees, representatives of and former representatives of American | | | |
| Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expet the care and treatment rendered as well as the facts and circumstances surrour 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | A | |
| Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expected the care and treatment rendered as well as the facts and circumstances surround 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | • |
| Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expected the care and treatment rendered as well as the facts and circumstances surroun 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | - |
| Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expected the care and treatment rendered as well as the facts and circumstances surroun 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | Pamela Flagg, CNA |
| The above identified nurses and certified Nurses' Assistants are expected the care and treatment rendered as well as the facts and circumstances surroun 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | Loretta Korinis |
| the care and treatment rendered as well as the facts and circumstances surrous 7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | |
| Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | nding this matter. | nd certified Nurses' Assistants are expected Il as the facts and circumstances surroundin | The above identified nurses ne care and treatment rendered as v |
| James E. Mock, M.D. The above identified physicians are expected to testify as to the rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | |
| rendered as well as the facts and circumstances surrounding this matter. 8. Employees, former employees, representatives of and former representatives of American | | | |
| of and former representatives of American | care and treatment | ans are expected to testify as to the care mstances surrounding this matter. | The above identified physi endered as well as the facts and circ |
| Nursing Services, Inc., | | ployees, representatives tatives of American | 8. Employees, former e of and former represe |
| | | | |
| Page 3 of 6 | | Page 3 of 6 | |

v

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Druve Suite 200 Las Vegas, Nevada 89144 Telefhone: 702-889-6400 Facsimile: 702-384-6025

n V

| 1 | | c/o Lewis Brisbois Bisgaard & Smith 400 South Fourth Street Suite 500 Las Vegas, Nevada 89101 |
|----------|---------------------------------|--|
| 3 | The a | bove described witnesses are expected to be identified during discovery and to |
| 4 | testify in reg questions inc | ards to all facts and circumstances surrounding Steven Farmer and the incident in luding but not limited to investigations performed, background checks performed ven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| 6 | 9. | Defendant reserves the right to supplement its list of witnesses. |
| 7 8 | 10. | Defendant reserves the right to call any witnesses identified by any other parties in this litigation. |
| 9 10 | | II. DOCUMENTS |
| 11 | 1. | Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD). |
| 12 13 | 2. | Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD). |
| 14 15 | 3. | Records produced by Nevada State Board of Nursing (Exhibit C on CD). |
| 16 17 | 4. | Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD). |
| 18 19 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E) |
| 20 21 | 6. | Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 |
| 22 | | (Exhibit F) |
| 23 24 | 7. | Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G) |
| 25 | 8. | Steven Dale Farmer Staffing Sheets. |
| 26 | υ. | Bates Numbered STAFF000001 – 000003 |
| 27 | | (Exhibit H) |
| 28 | | |
| | | |
| | | Page 4 of 6 |

, a

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telefhone: 702-889-6400 Facsimile: 702-384-6025

•

| ι. | | |
|--|-----------|--|
| | | |
| Îz- | 1 2 | 9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| ALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, nevada 89144 ephone: 702-889-6400 Facsmile: 702-384-6025 | 3 4 | 10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J attached hereto) |
| | 5 | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 - CHH00321 (Exhibit K attached hereto) |
| | 7 | 12. Privilege Log for Schedule of Steven Dale Farmer (Exhibit L attached hereto) |
| | . 9 10 | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 - CHH00325 |
| | 11 | (Exhibit M attached hereto) 14. Defendant reserves the right to supplement this list of documents. |
| | 12 13 | 15. Defendant reserves the right to utilize any document utilized or identified by any |
| | 13 | other party to this litigation. |
| | 15 | |
| RANGLE & 160 North To Sui Las Vecas, : 702-889-6400 | 16 | DATED this 11 th day of March, 2013. |
| LLL PRA 1160 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | 17 | HALL PRANGLE & SCHOONVELD, LLC |
| НАЫ | 18 | By: |
| | 19 20 | MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 |
| | 21 | JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 |
| | 22 | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| | 23 | Attorneys for Defendant Valley Health System, LLC d/b/a |
| | 24 | Centennial Hills Hospital Medical Center |
| | 25 | |
| | 26 | |
| م | 27 | |
| | 28 | |
| | | Page 5 of 6 |

CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 11th day of March, 2013, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S THIRD SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via facsimile and in a 7 sealed envelope, via US Mail, first class postage pre-paid to the following parties at their last 8 9 known address: 10 Eckley M. Keach, Esq. Robert E. Murdock, Esq. Eckley M. Keach, Chtd. Murdock & Associates, Chtd. 11 520 South Fourth Street 520 South Fourth Street 12 Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 Attorneys for Plaintiffs Attorneys for Plaintiff 13 Robert C. McBride, Esq. 14 S. Brent Vogel, Esq. MANDELBAUM ELLERTON & LEWIS BRISBOIS BISGAARD & SMITH 15 MCBRIDE 6385 South Rainbow Blvd., Suite 600 2012 Hamilton Lane Las Vegas, NV 89118 16 Las Vegas, Nevada 89106 Attorneys for Defendant Attorneys for Defendant American Nursing Services, Inc. 17 Steven Dale Farmer 18 19 An epoployee of HALL PRANGLE & SCHOONVELD, LLC 20 21 22 4811-0850-3571, v. 2 23 24 25 26 27 28

FACSIMILE: 702-384-6025

Las Vegas, nevada 89144 Telephone: 702-889-6400 Facsimile

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive

Page 6 of 6

AA2275

TAB 42

| - <u>-</u> | | |
|---|----|---|
| و ^ب وت م | | |
| ~ | | |
| | | SUPP |
| | 1 | MICHAEL E. PRANGLE, ESQ. |
| | 2 | Nevada Bar No. 8619 |
| | _ | JOHN F. BEMIS, ESQ. |
| | 3 | Nevada Bar No. 9509 |
| | 4 | HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 |
| | 5 | Las Vegas, NV 89144 |
| | | Phone: 702-889-6400 |
| | 6 | Facsimile: 702-384-6025 |
| | 7. | <u>mprangle@hpslaw.com</u> jbemis@hpslaw.com |
| | 8 | Attorneys for Defendant |
| | - | Valley Health System, LLC d/b/a |
| ۲. ۲۵ | 9 | Centennial Hills Hospital Medical Center |
| | 10 | DISTRICT COURT |
| JLC 4602 | 11 | |
| 1LD, LLC ve 702-384-6025 | | CLARK COUNTY, NEVADA |
| VEL Druve Le: 7(| 12 | JANE DOE, CASE NO. A595780 |
| ACONVELD, LJ ACONVELD, LJ Center Drive 00 Ada 89144 Facsimile: 702-384- | 13 | DEPT NO. II |
| | 14 | Plaintiff, |
| PRANGLE & AOONVEL 1160 North Town Center Drive Suite 200 Las Vegas, Nevada 89144 Ne: 702-889-6400 Facsimile: 70 | 15 | vs. |
| NGL Norl As Vi 2-889 | 16 | VALLEY HEALTH SYSTEM LLC, a Nevada |
| 1160 1160 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | 17 | limited liability company, d/b/a CENTENNIAL |
| · . | | HILLS HOSPITAL MEDICAL CENTER; |
| HALL Telepho | 18 | UNIVERSAL HEALTH SERVICES, INC., a |
| , T L | 19 | Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; |
| | 20 | STEVEN DALE FARMER, an individual; DOES I |
| | 21 | through X, inclusive; and ROE CORPORATIONS I |
| | | through X, inclusive, |
| | 22 | Defendants. |
| | 23 | |
| | 24 | DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S FOURTH SUPPLEMENT TO IT'S INITIAL |
| | 25 | EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS |
| | 26 | DEFENDANT VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS |
| | 27 | HOSPITAL MEDICAL CENTER (hereafter Centennial Hills Hospital) by and through its |
| | 28 | DEGETVEN |
| | | MAR 1 4 2013 |
| | | B PLANNIES 10 |
| | | |
| | | |
| | • | a <u>A 5957/80</u> 0 |

AA2276

attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits 1 its Fourth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows 2 3 (supplements provided in **bold**): 4 I. 5 WITNESSES 6 7 Jane Doe 1. c/o Robert E. Murdock, Esq. 8 Murdock & Associates, Chtd. 9 520 South Fourth Street Las Vegas, Nevada 89101 10 Jane Doe is expected to testify as to the facts and circumstances surrounding this matter 11 and her alleged damages. 12 Jane Doe's two sons 2. 13 Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding 14 this matter, their mother's alleged damages and conversations they had with their mother about 15 the incident. 16 Steven Dale Farmer 3. c/o Robert C. McBride, Esq. 17 Nevada Bar No. 7082 18 Mandelbaum Schwarz Ellerton & McBride 2012 Hamilton Lane 19 Las Vegas, Nevada 89106 20 Mr. Farmer is expected to testify as to the facts and circumstances surrounding this 21 matter and the allegations made against him. 22 Debra Scott, MSN, RN, FRE 4. **Executive** Director 23 Nevada State Board of Nursing 24 5011 Meadowwood Mall Way Suite 300 25 Reno, Nevada 89502-6567 26 Ms. Scott is expected to testify regarding The certification process, background check and investigation performed by the Nevada Board of Nursing prior to certification. 27 The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA 28

HALL PRANGLE & AOONVELD, LLC 1160 North Town Center Drive Suffe 200

250

FACSIMILE: 702-384-6025

89144

Las Vegas, Nevada Telephone: 702-889-6400 Facs

Page 2 of 6

Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing 1 prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). 2 5. Michael Egstad, Manager I Licensing and Certification Program 3 California Department of Public Health (CDPH) 4 ATCS - MS 3301 P.O. Box 997416 5 1615 Capitol Avenue Sacramento, CA 95899-7416 6 7 Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The 8 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). 9 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 10 00199703, Nurse Assistant Certificate 00659300). 702-384-6025 11 Collado Jeunnesse, RN 6. 12 Kim Moon, RN FACSIMILE: Abraham Deppa, CNA 13 Nikki Carter, CNA Marina McDowell, CNA 14 Alana Schons, CNA 15 **TELEPHONE: 702-889-6400** Nelina Arante, RN Ronald Lodevico 16 Venise Abelard, CNA Paula Mosley, RN 17 Pamela Flagg, CNA 18 Amber Vergara Loretta Korinis 19 Michelle Lucas 20 The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. 21 22 Curtis E. Bazemore, M.D. 7. Cobinder S. Chopra, M.D. 23 James E. Mock, M.D. 24 The above identified physicians are expected to testify as to the care and treatment 25 rendered as well as the facts and circumstances surrounding this matter. 26 Employees, former employees, representatives 8. 27 of and former representatives of American Nursing Services, Inc., 28

HOONVELD, LLC

HALL PRANGLE &

1160 NORTH TOWN CENTER DRIVI

LAS VEGAS, NEVADA 89144

SUITE 200

Page 3 of 6

c/o Lewis Brisbois Bisgaard & Smith 400 South Fourth Street Suite 500 Las Vegas, Nevada 89101

The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 9. Defendant reserves the right to supplement its list of witnesses.
- 10. Defendant reserves the right to call any witnesses identified by any other parties in this litigation.

II.

DOCUMENTS

- 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD).
- Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD).
- 3. Records produced by Nevada State Board of Nursing (Exhibit C on CD).
- Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD).
- 5. Daily Patient Assignment Sheets for the 6th Floor dated 05/13/2008 05/18/2008. Bates Numbered ASSIGN000001 000012 (Exhibit E)
- Critical Care Services Assignment Sheets for the 5th Floor dated 05/13/2008 05/18/2008. Bates Numbered ASSIGN000013 000023 (Exhibit F).
- Emergency Department Daily Assignments dated 05/13/2008 05/18/2008.
 Bates Numbered ASSGIN000024 000035 (Exhibit G)
- Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)

AA2279

HALL PRANGLE & AOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Leephone: 702-889-6400 Facsimile: 702-384-6025 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

- - 26 27

28

| - 1. | | | |
|--|----------|-----|--|
| | | | |
| | 1 2 | 9. | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| | 3 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J attached hereto) |
| | 5 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K attached hereto) |
| | 7 8 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L attached hereto) |
| 3 2 G | 9 10 | 13: | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 – CHH00325 (Exhibit M attached hereto) |
| ACONVELD, LLC ACONVELD, LLC Center Drive 00 add 89144 Facsimile: 702-384-6025 | 11 12 | 14. | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N attached hereto) |
| MN (| 13 14 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 – CHH00365 (Exhibit O attached hereto) |
| ANGLE & 60 North To 51 Las Vegas, 702-889-6400 | 15 | 16. | Defendant reserves the right to supplement this list of documents. |
| | 16 17 | 17. | Defendant reserves the right to utilize any document utilized or identified by any |
| | 18 | | o this litigation. |
| HAL | 19 | | ED this 12 th day of March, 2013. |
| | 20 | DAI | HALL PRANGLE & SCHOONVELD, LLC |
| | 21 | | CAA . |
| | 22 23 | | By: MICHAELE. PRANGLE, ESQ. |
| | 23 | | Nevada Bar No. 8619 JOHN F BEMIS, ESQ. |
| | 25 | | Nevada Bar No. 9509 |
| | 26 | | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| | 27 | | Attorneys for Defendant Valley Health System, LLC d/b/a |
| | 28 | | Centennial Hills Hospital Medical Center |
| | | | Page 5 of 6 |

CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 12th day of March, 2013, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S FOURTH SUPPLEMENT TO IT'S INITIAL 6 EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS in a sealed 7 envelope, via US Mail, first class postage pre-paid to the following parties at their last known 8 9 address: 10 Eckley M. Keach, Esq. Robert E. Murdock, Esq. Eckley M. Keach, Chtd. Murdock & Associates, Chtd. 11 520 South Fourth Street 520 South Fourth Street 12 Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 Attorneys for Plaintiffs Attorneys for Plaintiff 13 Robert C. McBride, Esq. 14 S. Brent Vogel, Esq. LEWIS BRISBOIS BISGAARD & SMITH MANDELBAUM ELLERTON & 15 MCBRIDE 6385 South Rainbow Blvd., Suite 600 2012 Hamilton Lane Las Vegas, NV 89118 16 Las Vegas, Nevada 89106 Attorneys for Defendant American Nursing Services, Inc. Attorneys for Defendant 17 Steven Dale Farmer 18 19 An employee of HALL PRANGLE & SCHOONVELD, LLC 20 21 22 23 4847-4765-2883, v. 1 24 25 26 27 28

HALL PRANGLE & HOONVELD, LLC 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 Telephone: 702-389-6400 Facsmile: 702-384-6025

Page 6 of 6

TAB 43

| | 1 2 3 4 5 6 7 8 | SUPP MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 Phone: 702-889-6400 Facsimile: 702-384-6025 <u>mprangle@hpslaw.com</u> <u>ibemis@hpslaw.com</u> Attorneys for Defendant | | | | | | | | |
|--|--------------------------------------|---|--------------------------------|--|--|--|--|--|--|--|
| | 9 | Valley Health System, LLC d/b/a | | | | | | | | |
| Ŷ | 10 | DISTRICT COU | RT | | | | | | | |
| 384-602 | 11 | CLARK COUNTY, N | | | | | | | | |
| ada 89144 Facsimile: 702-384-6025 | 12 | | CASE NO. A595780 | | | | | | | |
| | 13 | | DEPT NO. II | | | | | | | |
| NEVAD | 14 | Plaintiff, | | | | | | | | |
| LAS VECAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE | 15 | VS. | | | | | | | | |
| | 16 17 18 19 20 21 | VALLEY HEALTH SYSTEM LLC, a Nevada limited liability company, d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; STEVEN DALE FARMER, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, | | | | | | | | |
| | 22 | Defendants. | | | | | | | | |
| | 23 24 | DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S FIFTH SUPPLEMENT TO IT'S INITIAL | | | | | | | | |
| | 25 | EARLY CASE CONFERENCE LIST OF WI | TNESSES AND DOCUMENTS | | | | | | | |
| | 26 | DEFENDANT VALLEY HEALTH SYSTEN | 1, LLC, d/b/a CENTENNIAL HILLS | | | | | | | |
| | 27 28 | HOSPITAL MEDICAL CENTER (hereafter Centenn | REGUISED | | | | | | | |
| · | | Page 1 of 7 | MAR 2 0 2013 | | | | | | | |

ę

 $\langle \uparrow \rangle$

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive Suite 200

AA2282

attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits 1 its Fifth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows (supplements 2 3 provided in **bold**): 4 I. 5 WITNESSES 6 7 1. Jane Doe c/o Robert E. Murdock, Esq. 8 Murdock & Associates, Chtd. 9 520 South Fourth Street Las Vegas, Nevada 89101 10 FACSIMILE: 702-384-6025 Jane Doe is expected to testify as to the facts and circumstances surrounding this matter 11 and her alleged damages. 12 2. Jane Doe's two sons 13 Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding 14 this matter, their mother's alleged damages and conversations they had with their mother about LAS VEGAS, TELEPHONE: 702-889-6400 15 the incident. 16 Steven Dale Farmer 3. c/o Robert C. McBride, Esq. 17 Nevada Bar No. 7082 18 Mandelbaum Ellerton & McBride 2012 Hamilton Lane 19 Las Vegas, Nevada 89106 20 Mr. Farmer is expected to testify as to the facts and circumstances surrounding this 21 matter and the allegations made against him. 22 Debra Scott, MSN, RN, FRE 4. 23 Executive Director Nevada State Board of Nursing 24 5011 Meadowwood Mall Way Suite 300 25 Reno, Nevada 89502-6567 26 Ms. Scott is expected to testify regarding The certification process, background check 27 and investigation performed by the Nevada Board of Nursing prior to certification. The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA 28

HALL PRANGLE CCHOONVELD, LLC 1160 North Town Center Drive

89144

NEVADA

SUITE 200

Page 2 of 7

| • | |
|--|---|
| 1 | Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). |
| 2 3 4 5 6 7 8 9 10 11 10 11 10 11 10 11 10 11 11 | Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - NS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 9589-7416 Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for streen D. Parmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 0059300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Mikki Carter, CNA Marina McDowell, CNA Alana Schoas, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D. The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter. Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., |
| | Page 3 of 7 |

_

···· • •• •

c/o Lewis Brisbois Bisgaard & Smith 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Las Vecas, Nevada 89144 Telephone: 702-889-6400 Facsimile: 702-384-6025

HALL PRANGLE & CHOONVELD, LLC

160 NORTH TOWN CENTER DRIVE

SUITE 200

The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 9. Defendant reserves the right to supplement its list of witnesses.
- 10. Defendant reserves the right to call any witnesses identified by any other parties in this litigation.

II. DOCUMENTS

- 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD).
- Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD).
 - 3. Records produced by Nevada State Board of Nursing (Exhibit C on CD).
- Centennial Hills Hospital Job Description for CNA
 Bates Numbered Unit Coord/C N A 1 -8 (Exhibit D on attached CD).
- Daily Patient Assignment Sheets for the 6th Floor dated 05/13/2008 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
- Critical Care Services Assignment Sheets for the 5th Floor dated 05/13/2008 05/18/2008. Bates Numbered ASSIGN000013 000023 (Exhibit F)
- Emergency Department Daily Assignments dated 05/13/2008 05/18/2008.
 Bates Numbered ASSGIN000024 000035 (Exhibit G)
- Steven Dale Farmer Staffing Sheets.
 Bates Numbered STAFF000001 000003 (Exhibit H)

Page 4 of 7

| • | | | \bigcirc |
|---|----------------|-------|---|
| $\langle \rangle$ | 1 | 9. | Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I) |
| | 3 4 | 10. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit J) |
| | 5 6 | 11. | Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K) |
| | 7 8 | 12. | Privilege Log for Schedule of Steven Dale Farmer (Exhibit L) |
| r S S | 9 10 | 13. | Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 – CHH00325 (Exhibit M) |
| HOONVELD, LLC ENTER DRIVE DA 89144 ACSIMILE: 702-384-6025 | 11 12 | 14. | Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N) |
| CHOONVE WN CENTER DRI TTE 200 NEVADA 89144 | 13 14 | 15. | Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled CHH00326 – CHH00365 (Exhibit O) |
| LLL PRANGLE CHOONVEL 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 289-6400 Facsmile: 70 | 15 16 17 | 16. | Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P attached hereto) |
| HALL PR 11 Telerhone: | 18 19 | 17. | Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 – CHH00372. (Exhibit Q attached hereto) |
| | 20 21 | 18. | Defendant reserves the right to supplement this list of documents. |
| · · | 22 23 | | · . |
| | 24 | | |
| | 25 | • • • | |
| • | 26 | | |
| · (現計) | 27 28 | | |
| | | | |

Page 5 of 7

Defendant reserves the right to utilize any document utilized or identified by any 19. 1 other party to this litigation. 2 DATED this 18th day of March, 2013. 3 4 HALL PRANGLE & SCHOONVELD, LLC 5 6 By: HAELE PRANGLE, ESQ. M 7 Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. 8 Nevada Bar No. 9509 9 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 10 Attorneys for Defendant HALL PRANGLE COCHOONVELD, LLC 1160 NORTH TOWN CENTER DRIVE LAS VEGAS, NEVADA 89144 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025 Valley Health System, LLC d/b/a 11 Centennial Hills Hospital Medical Center 12 13 14 SUITE 200 15 16 17 18 19 20 21 22 23 24 25 26 27 28 Page 6 of 7

AA2287

CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC: that on the 18th day of March, 2013, I served a true and correct copy of the foregoing 3 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/2 CENTENNIAL HILLS 4 5 HOSPITAL MEDICAL CENTER'S FIFTH SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS in a sealed envelope, 7 via US Mail, first class postage pre-paid to the following parties at their last known address: 8 9 Eckley M. Keach, Esq. Robert E. Murdock, Esq. Eckley M. Keach, Chtd. Murdock & Associates, Chtd. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiffs Attorneys for Plaintiff 12 Robert C. McBride, Esq. S. Brent Vogel, Esq. 13 MANDELBAUM ELLERTON & LEWIS BRISBOIS BISGAARD & SMITH MCBRIDE 6385 South Rainbow Blvd., Suite 600 14 2012 Hamilton Lane Las Vegas, NV 89118 15 Las Vegas, Nevada 89106 Attorneys for Defendant Attorneys for Defendant American Nursing Services, Inc. 16 Steven Dale Farmer 17 18 An employee of HALL PRANGLE & SCHOONVELD, LLC 19 20 21 4834-7141-2755, v. 1 22 23 24 25 26 27 28

FACSIMILE: 702-384-6025

89144

LAS VEGAS, NEVADA TELEPHONE: 702-889-6400 FAC

HALL PRANGLE & CHOONVELD, LL

160 NORTH TOWN CENTER DRUV

Page 7 of 7

TAB 44

| ę | • | | | | | | | |
|--|---|---|---------------------------------|--|--|--|--|--|
| · · · · · · · · · · · · · · · · · · · | 1 2 3 4 5 6 7 8 9 | SUPP MICHAEL E. PRANGLE, ESQ. Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. Nevada Bar No. 9509 HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 702-889-6400 – Phone 702-384-6025 – Facsimile mprangle@hpslaw.com jbemis@hpslaw.com Attorneys for Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center | | | | | | |
| | 10 | | TIDT | | | | | |
| HOONVELD, LLC Denter Drive 00 Ada 89144 Facsimile: 702-384-6025 | 11 | DISTRICT COURT | | | | | | |
| GLD, IVE 702-3 | 12 | CLARK COUNTY, J | _ | | | | | |
| & SCHOONVELD, Town Center Drive Suite 200 As, Nevada 89144 00 Facsimile: 702-3 | 13 | JANE DOE, | CASE NO. A595780 DEPT NO. II | | | | | |
| CHO CENT 200 VABA FACS | 14 | Plaintiff, | | | | | | |
| Surte Surte And | 15 | VS. | | | | | | |
| PRANGLE & 1160 North To Su Las Vecas, Ne: 702-889-6400 | 16 | VALLEY HEALTH SYSTEM LLC, a Nevada | | | | | | |
| ~~ | 17 | limited liability company, d/b/a CENTENNIAL | | | | | | |
| J. P | 18 | HILLS HOSPITAL MEDICAL CENTER; UNIVERSAL HEALTH SERVICES, INC., a | | | | | | |
| HAI | 19 | Delaware corporation; AMERICAN NURSING SERVICES, INC., a Louisiana corporation; | | | | | | |
| - | 20 | STEVEN DALE FARMER, an individual; DOES I | | | | | | |
| | 21 | through X, inclusive; and ROE CORPORATIONS I through X, inclusive, | | | | | | |
| | 22 | Defendants. | | | | | | |
| | 23 | | | | | | | |
| | 24 | DEFENDANT VALLEY HEALTH SYSTEM, HOSPITAL MEDICAL CENTER'S SIXTH S | SUPPLEMENT TO IT'S INITIAL | | | | | |
| | 25 | EARLY CASE CONFERENCE LIST OF W | ITNESSES AND DOCUMENTS | | | | | |
| | 26 | DEFENDANT VALLEY HEALTH SYSTE | M, LLC, d/b/a CENTENNIAL HILLS | | | | | |
| } | 27 28 | HOSPITAL MEDICAL CENTER (hereafter Centen | | | | | | |
| ļ | | PLAINTIFFS by EXHIBIT 3 2 4 4 5 5 5 5 6 5 6 6 7 8 6 7 8 7 8 7 8 7 8 7 8 7 8 7 8 7 | JUN 11 2013 | | | | | |

ť

in the second

<u>ر المجرم</u> ا

| ¢ | ÷. | , | | | | | | | | |
|--------------------------------|--------------------------------------|-----------|---|--|--|--|--|--|--|--|
| $\langle $ | | 1 | attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits | | | | | | | |
| | | 2 | its Sixth Supplement to its NRCP 16.1 List of Witnesses and Documents as follows | | | | | | | |
| | | . 3 | (supplements provided in bold): | | | | | | | |
| | | 4 | I. | | | | | | | |
| | | 5 | WITNESSES | | | | | | | |
| | | 6 | | | | | | | | |
| | | 7 | 1. Jane Doe c/o Robert E. Murdock, Esq. | | | | | | | |
| | | 8 9 | MURDOCK & ASSOCIATES, CHTD. 520 South Fourth Street | | | | | | | |
| | | 10 | Las Vegas, Nevada 89101 | | | | | | | |
| CHOONVELD, LLC CENTER DRIVE | ADA 89144 Facsimile: 702-384-6025 | 11 | Jane Doe is expected to testify as to the facts and circumstances surrounding this matter and her alleged damages. | | | | | | | |
| 'ELD, uve | t :: 702- | 12 | 2. Jane Doe's two sons | | | | | | | |
| JONVEL Ter Drive | 89144 Simile: | 13 | Jane Doe's two sons are expected to testify as to the facts and circumstances surrounding | | | | | | | |
| VN CEN | VEVADA Fac | 14 | this matter, their mother's alleged damages and conversations they had with their mother the incident. | | | | | | | |
| E & | EGAS, ¹ -6400 | 15 | · · | | | | | | | |
| RANGLE 160 North | Las Vegas, 702-889-6400 | 16 | 3. Steven Dale Farmer c/o Robert C. McBride, Esq. | | | | | | | |
| LL PRANGLE 1160 North | | 17 NOF | MANDELBAUM ELLERTON & MCBRIDE 2012 Hamilton Lane | | | | | | | |
| HAL | TELEPI | 18 | Las Vegas, Nevada 89106 | | | | | | | |
| | • | . 19 | Mr. Farmer is expected to testify as to the facts and circumstances surrounding this | | | | | | | |
| | | 20 | matter and the allegations made against him. | | | | | | | |
| | | 21 | 4. Debra Scott, MSN, RN, FRE Executive Director | | | | | | | |
| | | 22 23 | Nevada State Board of Nursing 5011 Meadowwood Mall Way, Suite 300 | | | | | | | |
| | | 23 | Reno, NV 89502-6567 | | | | | | | |
| | | 25 | Ms. Scott is expected to testify regarding The certification process, background check | | | | | | | |
| | | | and investigation performed by the Nevada Board of Nursing prior to certification. The Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA | | | | | | | |
| | | | Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509). | | | | | | | |
| 1777 () 1777 () | | 28 | | | | | | | | |
| | | | | | | | | | | |
| | | | Page 2 of 8 | | | | | | | |

Michael Egstad, Manager I Licensing and Certification Program California Department of Public Health (CDPH) ATCS - MS 3301 P.O. Box 997416 1615 Capitol Avenue Sacramento, CA 95899-7416

Mr. Egstad is expected to testify regarding The certification process, background check and investigation performed by the California Board of Nursing prior to CNA certification. The Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D. Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300). Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).

> Collado Jeunnesse, RN Kim Moon, RN Abraham Deppa, CNA Nikki Carter, CNA Marina McDowell, CNA Alana Schons, CNA Nelina Arante, RN Ronald Lodevico Venise Abelard, CNA Paula Mosley, RN Pamela Flagg, CNA Amber Vergara Loretta Korinis Michelle Lucas

5.

6.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FACSIMILE: 702-384-6025

89144

LAS VEGAS, NEVADA

TELEPHONE: 702-889-6400

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE SUITE 200

The above identified nurses and certified Nurses' Assistants are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

7. Curtis E. Bazemore, M.D. Cobinder S. Chopra, M.D. James E. Mock, M.D.

The above identified physicians are expected to testify as to the care and treatment rendered as well as the facts and circumstances surrounding this matter.

Page 3 of 8

| ¢ , | ٩ | |
|---|--------------------|---|
| \bigcirc | 1 · 2 3 4 | Employees, former employees, representatives of and former representatives of American Nursing Services, Inc., c/o LEWIS BRISBOIS BISGAARD & SMITH 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 |
| • | 5 6 7 | The above described witnesses are expected to be identified during discovery and to testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in questions including but not limited to investigations performed, background checks performed regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital. |
| r \ 10 | 8 9 10 | 9. Crystal Johnson 4650 North Rainbow Blvd., #2109 Las Vegas, NV 89108 714-580-5383 |
| CHOONVELD, LLC CHOONVELD, LLC NN CENTER DRIVE E 200 VEVADA 89144 FACSIMILE: 702-384-6025 | 11 12 | Ms. Johnson is expected to testify as to the facts and circumstances surrounding this matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL. |
| CHOONVEL CENTER DRIVE CENTER DRIVE 00 VADA 89144 FACSIMILE: 70 | 13 14 | 10. Douglas Nichols c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC |
| AS, TOV | 15 16 | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| ALL PRANGLE 1160 north Las Veg Lephone: 702-889-6 | 17 | Mr. Nichols is expected to testify as to the facts and circumstances surrounding this matter. |
| HA. Tele | 19 | 11. Mary Jo Solon Southwest Medical Associates |
| | 20 21 | Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter. |
| | 22 23 | 12. Matthew Ross Rawson-Neal Psychiatric Hospital 1650 Community College Dr. Las Vegas, NV 89146 |
| | 24 25 | Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter. |
| | 26 27 | |
| | 28 | |
| | | Page 4 of 8 |

---AA2292

| ł | | 1 | | |
|--|--------------------------------------|----------|--------------|---|
| • | · | | | |
|) | | 1 2 | 13. | Michelle Simmons 5336 Fireside Ranch Ave. Las Vegas, NV 89131 |
| | | 3 | Ms. 5 | Simmons is expected to testify as to the facts and circumstances surrounding |
| | | 4 | this matter. | |
| | | 5 | 14. | Salvatore Sparacino |
| | | 6 | | c/o John F. Bemis, Esq. HALL PRANGLE & SCHOONVELD, LLC |
| | | 7 | | 1160 North Town Center Drive, Suite 200 Las Vegas, NV 89144 |
| LLC | | 8 | M 6 | |
| | | 9 | this matter. | paracino is expected to testify as to the facts and circumstances surrounding |
| | 125 | 10 | 15. | Defendant reserves the right to supplement its list of witnesses. |
| | -384-60 | 11 | 16. | Defendant reserves the right to call any witnesses identified by any other parties |
| /ELD Rive | 4 Е: 702- | 12 | 10. | in this litigation. |
| OON NTER D | ADA 89144 Facsimile: 702-384-6025 | 13 | | II. |
| SCH WN CEI | AS, NEVAD | 14 | | DOCUMENTS |
| LE & | Las VEGAS, 702-889-6400 | 15 | | |
| RANGLE & SCHOONVEL [160 NORTH TOWN CENTER DRIVE | | 16 | 1. | Jane Doe's medical records Bates Stamped CH00001 through CH00317 (Exhibit A on CD). |
| ALLP | EPHONE: | 17 18 | 2. | Centennial Hills Hospital Daily Security Logs Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD). |
| H | Tel | 19 | 3. | Records produced by Nevada State Board of Nursing |
| | | 20 | 3. | (Exhibit C on CD). |
| | | 21 22 | 4. | Centennial Hills Hospital Job Description for CNA Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD). |
| | | 23 | 5. | Daily Patient Assignment Sheets for the 6 th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 |
| | | 25 | 6. | (Exhibit E) Critical Care Services Assignment Sheets for the 5 th Floor dated 05/13/2008 – |
| | | 26 | | 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F) |
| | | 27 | | |
| 1 | | 28 | | |
| Į | | | | |
| | | | | Page 5 of 8 |

(**1**7)

AA2293

I

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

702-384-6025

FACSIMILE:

TELEPHONE: 702-889-6400

LAS VECAS, NEVADA 89144

SULTE 200

HALL PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive 7.

Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)

- Steven Dale Farmer Staffing Sheets.
 Bates Numbered STAFF000001 000003 (Exhibit H)
- Broadlane, Inc. Contract dated 08/12/2007
 Bates Numbered BROADLANE000001 000050 (Exhibit I)
- 10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)
- Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 - CHH00321 (Exhibit K)
- 12. Privilege Log for Schedule of Steven Dale Farmer (Exhibit L)
- Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008 bates labeled CHH00322 - CHH00325 (Exhibit M)
- 14. Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer (Exhibit N)
- 15. Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled
 CHH00326 CHH00365
 (Exhibit O)
- Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)
- Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008, and May 2008 bates labeled CHH00366 - CHH00372 (Exhibit Q)
- 18. Medical Records from Clark County Adult Mental Health bates labeled CCAMH00001 - CCAMH00022 (Exhibit R attached hereto via CD)
- 19. Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 - Chop00038 (Exhibit S attached hereto via CD)

Page 6 of 8

| * · · · · · · · · · · · · · · · · · · · | · | | \bigcirc | | |
|---|----------|----------------|-----------------------------------|-------------|---|
| $\langle \rangle$ | l | 20. | | | untainView Hospital bates labeled MVH00001 – ached hereto via CD) |
| | 2 3 | 21. | | | athern Hills Hospital bates labeled Shills00001 – Ached hereto via CD) |
| | 4 5 | 22. | | | versity Medical Center bates labeled UMC00001 – ached hereto via CD) |
| | 6 | 23. | Defendant reserves | s the right | to supplement this list of documents. |
| | 7 | 24. | Defendant reserves | s the right | t to utilize any document utilized or identified by any |
| | 8 9 | other party to | this litigation. | | |
| | 10 | DATE | D this 7 th day of Jur | ne, 2013. | |
| LD, LLC /E 702-384-6025 | 11 | | | | HALL PRANGLE & SCHOONVELD, LLC |
| CHOONVELD, LLC Center Drive 200 vada 89144 Facsimile: 702-384-602. | 12 | | · . | | |
| HOONVE HOONVE Center Dru 00 Ada 89144 Facsimile: | 13 | | | By: | MICHAEL E. PRANGLE, ESQ. |
| E 200 | 14 | | | | Nevada Bar No. 8619 JOHN F. BEMIS, ESQ. |
| ILE & SCHC RETH TOWN CEN RETH TOWN CEN BUTE 200 VECAS, NEVADA | 15 | | | | Nevada Bar No. 9509 1160 North Town Center Drive, Suite 200 |
| PRANCLE & SCHOONVEL 1160 North Town Center Drive Suite 200 Las Vecas, Nevada 89144 ve: 702-889-6400 Facsimile: 70 | 16 | | | | Las Vegas, NV 89144 |
| NLL PR 11 effone: | 17 | | | | Attorneys for Defendant Valley Health System, LLC d/b/a |
| HALL PF 11 Telefhone: | 18 | | | | Centennial Hills Hospital Medical Center |
| | 19 20 | | | | |
| | 21 | • • • | | | |
| | 22 | | | | |
| | 23 | | | | |
| | 24 | ••• | | | |
| ι, | 25 | | | | |
| | 26 | | | | |
| | 27 | • • • | | · | |
| | 28 | | | | |
| (<u>,)</u> | | | | | |
| | | | | · | Page 7 of 8 |

AA2295

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, 2 LLC; that on the 7th day of June, 2013, I served a true and correct copy of the foregoing 3 4 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS 5 HOSPITAL MEDICAL CENTER'S SIXTH SUPPLEMENT TO IT'S INITIAL EARLY 6 CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS in a sealed envelope, 7 via US Mail, first class postage pre-paid to the following parties at their last known address: 8 9 Robert E. Murdock, Esq. Eckley M. Keach, Esq. Murdock & Associates, Chtd. Eckley M. Keach, Chtd. 10 520 South Fourth Street 520 South Fourth Street Las Vegas, Nevada 89101 Las Vegas, Nevada 89101 11 Attorneys for Plaintiffs Attorneys for Plaintiff 12 S. Brent Vogel, Esq. Robert C. McBride, Esq. 13 LEWIS BRISBOIS BISGAARD & SMITH MANDELBAUM ELLERTON & 6385 South Rainbow Blvd., Suite 600 **MCBRIDE** 14 Las Vegas, NV 89118 2012 Hamilton Lane 15 Las Vegas, Nevada 89106 Attorneys for Defendant American Nursing Services, Inc. Attorneys for Defendant 16 Steven Dale Farmer 17 18 An employee of HALL PRANGLE & SCHOONVELD, LLC 19 20 4818-1872-9748, v. 1 22 Page 8 of 8

HALL PRANGLE & SCHOONVELD, LLC /ADA 89144 Facsimile: 702-384-6025 1160 NORTH TOWN CENTER DRIVE SULTE 200 Las Vegas, Ney Telephone: 702-889-6400

21

23

24

25

26

27

28