

TAB 54

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<p>1 DISTRICT COURT</p> <p>2 CLARK COUNTY, NEVADA</p> <p>3 JANE DOE,</p> <p>4 Plaintiff,</p> <p>5 vs.</p> <p>6 VALLEY HEALTH SYSTEM LLC,</p> <p>7 a Nevada limited</p> <p>8 liability company, d/b/a</p> <p>9 CENTENNIAL HILLS HOSPITAL</p> <p>10 MEDICAL CENTER; UNIVERSAL</p> <p>11 HEALTH SERVICES, INC., a</p> <p>12 Delaware corporation;</p> <p>13 AMERICAN NURSING</p> <p>14 SERVICES, INC., a</p> <p>15 Louisiana corporation;</p> <p>16 STEVEN DALE FARMER, an</p> <p>17 individual; DOES I</p> <p>18 through X, inclusive; and</p> <p>19 ROE CORPORATIONS I</p> <p>20 through X, inclusive,</p> <p>21 Defendants.</p> <p>22 -----</p> <p>23 DEPOSITION OF</p> <p>24 RENATO SUMERA, RN</p> <p>25 Friday, May 1, 2015</p> <p>9:30 a.m.</p> <p>521 S. Third Street</p> <p>Las Vegas, Nevada</p> <p>Carol O'Malley, CCR 178, RMR</p>	<p>1 APPEARANCES OF COUNSEL (Cont'd)</p> <p>2 For Defendant Farmer:</p> <p>3 CARROLL, KELLY, TROTTER,</p> <p>4 FRANZEN, McKENNA &amp; PEABODY</p> <p>5 CHELSEA R. HUETH, ESQ.</p> <p>6 Suite 260</p> <p>7 8329 W. Sunset Road</p> <p>8 Las Vegas, Nevada 89113</p> <p>9 702.792.5755</p> <p>10 702.796.5855 Fax</p> <p>11 crhueth@cktfmlaw.com</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 2	Page 4
<p>1 APPEARANCES OF COUNSEL</p> <p>2 For Plaintiff:</p> <p>3 MURDOCK &amp; ASSOCIATES, CHTD.</p> <p>4 ROBERT E. MURDOCK, ESQ.</p> <p>5 520 S. Fourth Street</p> <p>6 Second Floor</p> <p>7 Las Vegas, Nevada 89101</p> <p>8 702.384.5563</p> <p>9 702.384.4570 Fax</p> <p>10 lasvegasjustice@aol.com</p> <p>11 For Defendant Valley Health System LLC, d/b/a</p> <p>12 Centennial Hills Hospital Medical Center:</p> <p>13 HALL PRANGLE &amp; SCHOONVELD, LLC</p> <p>14 JOHN F. BEMIS, ESQ.</p> <p>15 Suite 200</p> <p>16 1160 N. Town Center Drive</p> <p>17 Las Vegas, Nevada 89144</p> <p>18 702.889.6400</p> <p>19 702.384.6025 Fax</p> <p>20 jlbemis@hpslaw.com</p> <p>21 For Defendant American Nursing Services, Inc.:</p> <p>22 LEWIS BRISBOIS BISGAARD &amp; SMITH LLP</p> <p>23 AMANDA J. BROOKHYSER, ESQ.</p> <p>24 6385 S. Rainbow Boulevard</p> <p>25 Suite 600</p> <p>Las Vegas, Nevada 89118</p> <p>702.693.4320</p> <p>702.893.3383</p> <p>702.893.3789 Fax</p> <p>amanda.brookhyser@lewisbrisbois.com</p> <p>PYATT &amp; SILVESTRI</p> <p>JAMES P.C. SILVESTRI, ESQ.</p> <p>701 Bridger Avenue</p> <p>Las Vegas, Nevada 89101</p> <p>702.383.6000</p> <p>702.477.0088</p> <p>jsilvestri@psh-law.com</p>	<p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 WITNESS: Renato Sumera</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXAMINATION PAGE</p> <p>8</p> <p>9 By Mr. Murdock 5, 127</p> <p>10 By Mr. Silvestri 89, 146</p> <p>11</p> <p>12</p> <p>13</p> <p>14 INDEX TO EXHIBITS</p> <p>15</p> <p>16 EXHIBITS MARKED</p> <p>17 1 Voluntary Statement of Margaret Wolfe 75</p> <p>18 2 Caliper Measurements 151</p> <p>19 3 Centennial Hills Hospital ECG Report 151</p> <p>20 4 Centennial Hills Hospital ECG Report 152</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>



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

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



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1 A. I wish he did, but no.  
2 Q. You never tried to get him a job at  
3 Centennial or anything like that?  
4 A. No. I told him just go full-time. Just  
5 worry about your studies.  
6 Q. Okay. Now, you said that Centennial had a  
7 system of badges, right?  
8 A. Yes.  
9 Q. What was the color of the badges?  
10 A. It's white, with your picture on it.  
11 Q. Was it always that way?  
12 A. As far as I remember, yes.  
13 Q. I thought you said something about orange.  
14 A. That's just a second badge behind the  
15 official badge, and it has an orange -- at least mine  
16 has a big orange "RN" on it, so everybody will know  
17 you're an RN. It kinds of jumps out at you.  
18 Q. And that's the way it's always been there,  
19 right?  
20 A. Yes.  
21 Q. So in other words, you would have a front  
22 badge with your picture on it?  
23 A. Correct.  
24 Q. And it's also got your first name, right?  
25 A. Yes.

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1 Q. Does it have your last name?  
2 A. This one, we don't.  
3 Q. What about back in 2008?  
4 A. I believe not. I don't remember really.  
5 Q. Do you have it with you?  
6 A. No, I didn't bring it.  
7 Q. What does it say on it?  
8 A. "Renato, RN." "RN Class 3," I believe.  
9 Q. Okay.  
10 A. And then behind that there's the orange RN  
11 sign.  
12 Q. Now, is that actually attached to the badge  
13 somehow, that orange RN thing?  
14 A. No. It's a separate card.  
15 Q. Okay. Since 2008 has your badge said  
16 "Centennial Hills Hospital?"  
17 A. Yes.  
18 Q. And does it say Valley Health Systems?  
19 A. I don't know for sure.  
20 Q. Does it say "Universal Health Services,"  
21 "UHS?"  
22 A. I don't think so.  
23 Q. The RN orange thing, does everybody who  
24 works there have some sort of color identification  
25 underneath their other identification?

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1 A. As far as I know, yes.  
2 Q. Are they different colors for different  
3 staff?  
4 A. I've seen orange, and then I'm not sure  
5 about the other staff. I really don't notice other  
6 staff, as far as what department they're from.  
7 Q. So for instance, CNAs, do they have  
8 something that says "CNA?"  
9 A. I don't know for sure.  
10 Q. Okay.  
11 A. But their white card will have a CNA. The  
12 very front will have a CNA tag on there. Not a big  
13 colorful thing. I'm not sure about the colorful  
14 things. I really didn't notice that.  
15 Q. Okay. I'm not sure I understand you. What  
16 are you talking about here?  
17 A. Okay. Myself, the front will have your  
18 first name, and then your classification -- RN, CNA,  
19 radiology.  
20 Q. Oh, okay. So that's what you're talking  
21 about?  
22 A. Yeah.  
23 Q. And then the colored one behind, you just  
24 don't know what color it is?  
25 A. Yeah, I just don't notice, as far as other

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1 departments.  
2 Q. But certainly they'll say "CNA," right?  
3 MR. BEMIS: I object to form.  
4 BY MR. MURDOCK:  
5 Q. You can answer.  
6 A. I don't remember. I don't really notice.  
7 Q. Okay. So in other words, since you've been  
8 there since 2008, you haven't really noticed what  
9 CNAs wear?  
10 A. I will look at the tag. I always look at  
11 the name tag.  
12 Q. I understand that. So for the last seven  
13 years, since you've worked there for seven years, you  
14 can't tell me what a CNA badge --  
15 A. I know what a CNA badge looks like. I just  
16 look at the white card -- the very front.  
17 Q. But that's the front card. I'm talking  
18 about the second card behind it.  
19 A. I don't really care about the second card,  
20 because that can come off also.  
21 Q. Well, how do you know who's a CNA and --  
22 A. I just look at the name tag.  
23 Q. So that's what you'd have to do?  
24 A. Yeah.  
25 Q. Okay. And you're aware, aren't you, that

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1 at least at some point in time there have been agency  
2 staff who have worked at the hospital?  
3 A. Yes.  
4 Q. Do the agency badges -- tell me about  
5 those. How do you know who is an agency staff and  
6 who isn't?  
7 A. We will get a report that we're going to  
8 get another person being pulled somewhere.  
9 Q. That was a bad question of mine.  
10 If I'm a patient and I'm looking  
11 at somebody's badge, how do I know if they're a staff  
12 member or not, of the hospital?  
13 MR. BEMIS: I object to form. Go ahead  
14 and answer it, if you know.  
15 THE WITNESS: By looking at the badge,  
16 you will have the person's name, what they're there  
17 for, as far as an RN or a CNA.  
18 BY MR. MURDOCK:  
19 Q. But will it say the agency name? What does  
20 it say?  
21 A. I'm not sure about the agency name.  
22 Q. Does it have their picture on it?  
23 A. Oh, God. I don't remember, as far as the  
24 beginning.  
25 Q. Well, in other words, if I'm working at the

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1 hospital, how do I know you're an agency person or  
2 just another employee?  
3 A. I always ask them.  
4 Q. So you have to ask?  
5 A. You have to ask.  
6 Q. So you couldn't do it just by looking at  
7 their badge, right?  
8 MR. BEMIS: I object to form.  
9 BY MR. MURDOCK:  
10 Q. Go ahead. You can answer.  
11 A. I would look at the badge, and if I don't  
12 know their face, I would ask them, "Where are you  
13 coming from?" Which I always do.  
14 Q. Okay. And you said you get some documents  
15 saying that some staff members are there, or  
16 something like that?  
17 A. Yeah. If you're the charge nurse or the  
18 relief charge nurse, before the shift starts you will  
19 know who's coming down to your department, as far as  
20 someone being pulled. They'll let you know whether  
21 that's an agency nurse or agency CNA, yeah.  
22 Q. And is that a document that you get?  
23 A. It's a report that we get from the house  
24 supervisor. The staffing actually.  
25 Q. And is that the way it's always been at the

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1 hospital?  
2 A. Yes.  
3 Q. Okay. So when you get this report, then  
4 you'll know whether the person is an agency nurse or  
5 a CNA or not, is that correct?  
6 A. Correct.  
7 Q. Do the patients get that report?  
8 A. No.  
9 Q. So it's just staff members?  
10 A. Staff members, yeah.  
11 Q. Does all the staff get it, or just the  
12 charge nurse?  
13 A. Pretty much the first one would be the  
14 charge nurse.  
15 Q. Does everybody else get it then?  
16 A. They'll know once we're in the huddle.  
17 They'll know who's going to be working that night.  
18 They'll meet up, introduce themselves.  
19 Q. Okay. When agency staff is there, does the  
20 agency manager come on shift to tell them what to do?  
21 A. I've never seen an agency manager.  
22 Q. Oh, okay. So you, as the charge nurse from  
23 Centennial Hills Hospital -- you'll tell that person  
24 what to do, right?  
25 A. Yes, the rules.

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1 Q. And you'll tell them, as a matter of fact,  
2 to go into -- whatever, room 1 or room 2, right?  
3 A. Yeah. Assignments, we call it.  
4 Q. Right. You'll direct them to that, right?  
5 A. Yeah.  
6 Q. Not the agency itself, correct?  
7 A. Correct.  
8 Q. You'll tell them to go empty a bedpan,  
9 correct?  
10 MR. BEMIS: I object to form. Go  
11 ahead.  
12 THE WITNESS: I can't say that.  
13 Usually the nurse that needs help will ask.  
14 BY MR. MURDOCK:  
15 Q. Okay. What I'm getting at is, the agency  
16 manager doesn't come in and tell them to go empty  
17 bedpans, right?  
18 A. No.  
19 Q. The agency manager doesn't come in to go  
20 tell them to change leads or help fix leads on the  
21 EKG, right?  
22 A. No.  
23 Q. The agency staff doesn't come in and tell  
24 them to go clean up vomit that's on the floor, right?  
25 A. No.

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1 Q. That would be the charge nurse, or whoever  
2 is directing that person from Centennial Hills  
3 Hospital, right?  
4 A. Correct.  
5 Q. Okay. Now, do you know a nurse by the name  
6 of Christine Murray?  
7 A. I don't recall that person's name.  
8 Q. Back in 2008 who was your director of  
9 nursing?  
10 A. Oh, God. I know her first name is Amy.  
11 Bochenek I believe is the last name. You're testing  
12 my memory again.  
13 Q. That's what this is all about. So Amy  
14 Bochenek?  
15 A. Bochenek, but we pronounce it Bohenek.  
16 Q. And what about a Ms. Wescott? Do you know  
17 a Ms. Wescott?  
18 A. I don't recall that name.  
19 Q. Okay. Have you ever reviewed the nursing  
20 regulations at all?  
21 MR. BEMIS: I object to form. Which  
22 nursing regulations?  
23 BY MR. MURDOCK:  
24 Q. You can answer the question.  
25 A. Which nursing regulations?

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1 Q. The Nevada Administrative Code.  
2 A. A long time ago.  
3 Q. Okay.  
4 A. Yes.  
5 Q. Are you required to report certain things  
6 you witness, to the Board?  
7 MR. SILVESTRI: Objection. Calls for a  
8 legal conclusion.  
9 MR. BEMIS: Join.  
10 THE WITNESS: It depends on what I'm  
11 witnessing.  
12 BY MR. MURDOCK:  
13 Q. What do you believe you're required to  
14 report?  
15 A. Anything that would cause harm to the  
16 patient or harm to the staff members.  
17 Q. And does that mean, in other words, if you  
18 witness a staff member doing something to a patient,  
19 you should report it?  
20 A. Absolutely.  
21 Q. If you witness a patient doing something to  
22 a staff member, does that have to get reported?  
23 A. Yes.  
24 Q. Who does that get reported to?  
25 A. The charge nurse. Whoever is the charge

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1 nurse that night.  
2 Q. Okay. If you witness a staff member doing  
3 something to a patient that you believe is harmful to  
4 the patient, who does that get reported to?  
5 A. That would be reported to the house  
6 supervisor.  
7 Q. Who was the house supervisor back in 2008?  
8 A. I just remember his first name. This is  
9 for the nightshift. It's Dodgey. I don't know his  
10 last name.  
11 Q. Is the house supervisor a nurse?  
12 A. Yes.  
13 Q. Dodgey?  
14 A. Yeah.  
15 Q. In your seven years of working at  
16 Centennial Hills Hospital have you ever reported  
17 anything to the house supervisor?  
18 A. Well, the incidents where I got hurt by a  
19 patient.  
20 Q. Sure. But anything else?  
21 A. Let's see. I mean to me they're all minor  
22 reports.  
23 Q. Well, did you ever report another staff  
24 member?  
25 A. No.

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1 Q. So all of your reports to the house  
2 supervisor would have been when patients did  
3 something?  
4 A. Patient-related.  
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  
8 them to the State Board of Nursing?  
9 A. No.  
10 Q. Have you ever seen a staff member do  
11 something harmful to a patient?  
12 A. No.  
13 Q. Have you ever seen a staff member do  
14 something suspicious?  
15 MR. BEMIS: I object to form.  
16 THE WITNESS: No.  
17 BY MR. MURDOCK:  
18 Q. Nothing at all?  
19 A. No.  
20 Q. You've never seen any staff member, agency  
21 staff, or anybody at the hospital -- who works for  
22 the hospital, or an agency staff, do anything  
23 suspicious at all?  
24 MR. BEMIS: I object to form.  
25 THE WITNESS: What do you mean by

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1 "suspicious?"  
2 BY MR. MURDOCK:  
3 Q. Odd.  
4 MR. BEMIS: I object to form.  
5 THE WITNESS: What's odd?  
6 BY MR. MURDOCK:  
7 Q. Well, for instance, seeing a CNA in a  
8 patient's room when they weren't called. Have you  
9 ever seen that?  
10 A. Sometimes a CNA will stock the room.  
11 MR. SILVESTRI: Will what?  
12 THE WITNESS: Stock the room.  
13 MR. SILVESTRI: With what?  
14 THE WITNESS: With urinals, gauze --  
15 MR. SILVESTRI: Supplies?  
16 THE WITNESS: Supplies. Exactly.  
17 BY MR. MURDOCK:  
18 Q. But that would be appropriate.  
19 A. Yeah.  
20 Q. I'm talking where a patient is in a room  
21 and a CNA just walks in the room. Is that odd?  
22 MR. BEMIS: I object to form.  
23 THE WITNESS: No.  
24 BY MR. MURDOCK:  
25 Q. Have you ever seen a CNA touch a woman in

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1 an inappropriate or just odd way?  
2 MR. BEMIS: I object to form.  
3 THE WITNESS: No.  
4 BY MR. MURDOCK:  
5 Q. Since 2008 -- by the way, were you hired as  
6 a charge nurse?  
7 A. No. Staff nurse.  
8 Q. Staff nurse. Have you ever been a charge  
9 nurse?  
10 A. Not officially a charge nurse. Always a  
11 relief or staff.  
12 Q. You've never been a charge nurse?  
13 A. No. I'm too old for that. I'm kidding.  
14 Q. So you've never been a charge nurse?  
15 A. No, not in a charge nurse role. Just a  
16 relief charge.  
17 Q. What is a relief charge?  
18 A. If a charge nurse wants to take a day off,  
19 I will be a relief charge. They do need days off.  
20 Q. Okay. So at times you would actually go in  
21 and be that charge nurse, right?  
22 A. A relief charge.  
23 Q. What are the duties of a charge nurse or  
24 relief charge nurse?  
25 A. Make sure the room is run efficiently, and

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1 priority is patient safety.  
2 Q. And when you say the room is run safely,  
3 you mean the ER itself?  
4 A. Yes.  
5 Q. Are there any differences in duties between  
6 a relief charge nurse and a charge nurse?  
7 MR. BEMIS: I object to form. Go ahead  
8 and answer, if you know.  
9 THE WITNESS: The charges can do more,  
10 as far as paychecks. I don't know payroll. There  
11 are some things I cannot do.  
12 BY MR. MURDOCK:  
13 Q. Prior to coming to this deposition today,  
14 have you spoken to anybody about the deposition?  
15 A. Yesterday I was debriefed.  
16 Q. Who were you debriefed by?  
17 A. John. Just to make sure I come here on  
18 time, where is the place at.  
19 MR. BEMIS: Don't talk about anything  
20 that we talked about.  
21 BY MR. MURDOCK:  
22 Q. Well, actually I want you to start talking  
23 about it, because he's not your lawyer. You've  
24 already said that. I'd like to know the exact  
25 conversation you had with Mr. Bemis.

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1 MR. BEMIS: I object to form and I  
2 instruct him not to answer, because he is represented  
3 by counsel.  
4 MR. MURDOCK: No, you've told him he's  
5 represented. He told us at the beginning of the  
6 deposition you're not his lawyer.  
7 If you're not his lawyer, there is  
8 no privilege, and John, you know that.  
9 MR. BEMIS: There is a privilege,  
10 because he is being represented by counsel for  
11 purposes of this deposition.  
12 MR. MURDOCK: No, you're telling him  
13 that he's represented. That's inappropriate.  
14 BY MR. MURDOCK:  
15 Q. Have you ever retained Mr. Bemis to  
16 represent you?  
17 A. As far as he's with the hospital?  
18 Q. No, you personally. Have you ever retained  
19 Mr. Bemis to represent you at all?  
20 A. No.  
21 Q. I'm sorry? The answer was "no," correct?  
22 A. What do you mean by that?  
23 MR. BEMIS: Have you accepted my  
24 representation as counsel?  
25

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1 BY MR. MURDOCK:  
2 Q. Go ahead. Answer that question, please.  
3 A. Yes.  
4 Q. Okay. Good. So did Mr. Bemis ask you  
5 whether or not you wanted to be represented? Please  
6 tell me, has Mr. Bemis ever asked you if you wanted  
7 to be represented at this deposition?  
8 MR. BEMIS: I'm going to instruct him  
9 not to answer.  
10 MR. MURDOCK: Why? That's not  
11 privileged.  
12 MR. BEMIS: It's privileged  
13 communication.  
14 MR. MURDOCK: No, it's not.  
15 MR. BEMIS: We can call the Discovery  
16 Commissioner if you want.  
17 MR. MURDOCK: I'm not going to call the  
18 Discovery Commissioner. I'm going to file a motion.  
19 You're instructing him not to  
20 answer a question before you even represented him.  
21 MR. BEMIS: No, I'm instructing him not  
22 to talk about a communication I've had with him.  
23 MR. MURDOCK: Before you even  
24 represented him.  
25 MR. BEMIS: No.

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1 BY MR. MURDOCK:  
2 Q. Before Mr. Bemis allegedly represented you,  
3 how did you come to know Mr. Bemis?  
4 A. In the past.  
5 Q. Tell me about it.  
6 A. When this first occurred.  
7 Q. Tell me about it.  
8 A. As far as exact date, I cannot tell you.  
9 Q. Okay. Tell me about the communications,  
10 conversations, whatever.  
11 A. I don't recall.  
12 Q. You understand that you're under oath, sir?  
13 A. I sure am.  
14 Q. Do you understand what the law of perjury  
15 is?  
16 A. Yes.  
17 Q. You understand that when you state you  
18 don't remember something, but you actually do, that  
19 that could be called perjury?  
20 A. Absolutely.  
21 Q. Okay. Knowing that, when did you first  
22 come into contact with Mr. Bemis?  
23 A. The one I remember for sure was yesterday.  
24 Q. Well, that was yesterday.  
25 A. That was yesterday.

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1 Q. Prior to yesterday had you ever heard Mr.  
2 Bemis' name?  
3 A. A while back. I don't know exactly when.  
4 Q. Would it have been right when this incident  
5 occurred?  
6 A. I think so, yes.  
7 Q. Okay. Can you tell me the circumstances  
8 under which you met Mr. Bemis?  
9 A. The conversation I don't remember.  
10 Q. Hold on. I'm not asking about the  
11 conversation itself. I'm asking you, was it at the  
12 hospital?  
13 A. At the hospital.  
14 Q. Was it in a room at the hospital?  
15 A. Yes. In a room at the hospital, yes.  
16 Q. And you said it would have been right  
17 around the time of the incident, is that correct?  
18 A. Possibly after the incident, yes. After  
19 the incident.  
20 Q. And the incident we're talking about is  
21 with Mr. Farmer, is that correct?  
22 A. Yes.  
23 Q. And who was in the room with you besides  
24 Mr. Bemis?  
25 A. I don't remember. I really don't remember.

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1 Q. Was there anybody in there?  
2 A. Two more people, but I don't remember who  
3 they are.  
4 Q. Were they lawyers?  
5 A. I don't remember.  
6 Q. Was it Ms. Bochenek?  
7 A. No, she wasn't there.  
8 Q. How do you know that?  
9 A. I would know her. I know what she looks  
10 like.  
11 Q. So it's two people there who you just  
12 didn't know who they were?  
13 A. Yeah.  
14 Q. Is that a yes?  
15 A. That's a yes.  
16 Q. And tell me about the discussion that was  
17 had.  
18 A. I don't remember the conversation.  
19 Q. How long was the conversation?  
20 A. Timewise I don't remember.  
21 Q. Can you estimate it for me?  
22 A. Ten minutes.  
23 Q. Do you believe that the conversation took  
24 place within days of the arrest of Mr. Farmer, or are  
25 we talking months down the line?

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1 MR. BEMIS: I object to form.  
2 THE WITNESS: I don't remember the  
3 time, as far as time span.  
4 BY MR. MURDOCK:  
5 Q. Is it more likely than not that it occurred  
6 within days after the arrest?  
7 A. I don't know exactly, but maybe.  
8 Q. Well, was it more likely than not that  
9 that's when it occurred?  
10 MR. BEMIS: I object to form.  
11 THE WITNESS: Yes, sir.  
12 BY MR. MURDOCK:  
13 Q. Okay. By the way, what room was it in at  
14 the hospital?  
15 A. Oh, gosh. It might be one of the  
16 conference rooms.  
17 Q. Were you seated?  
18 A. Yes, I was.  
19 Q. And do you recall being shown any  
20 documents?  
21 A. No.  
22 Q. Do you recall who spoke?  
23 A. John. John was there.  
24 Q. Right, I know John was there, but you said  
25 there were two other people as well.

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1 A. Yeah, but I don't know who they are. I  
2 don't remember who they are, and I don't recall the  
3 conversation.  
4 Q. Okay. Did someone take a recorded  
5 statement of you?  
6 A. I don't think so.  
7 Q. Was there a video camera there?  
8 A. I don't remember a video camera.  
9 Q. Were people taking notes?  
10 A. I don't recall.  
11 Q. Can you describe the other people in the  
12 room?  
13 A. No, I can't.  
14 Q. Were they men or women?  
15 A. I don't recall. I want to say one is a  
16 female.  
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.  
23 Q. Did you ask to sign anything?  
24 A. No.  
25 Q. And you can't recall anything about the

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1 conversation?  
2 A. That's too long ago.  
3 Q. Did they ask you your name?  
4 MR. BEMIS: I object to form. I'm  
5 going to instruct him not to answer any communication  
6 he had after now.  
7 MR. MURDOCK: You weren't his lawyer.  
8 MR. BEMIS: I'm going to object to form  
9 and instruct him not to answer.  
10 THE WITNESS: I don't remember the  
11 conversation.  
12 MR. MURDOCK: John, you keep  
13 instructing him not to answer. You weren't his  
14 lawyer.  
15 MR. BEMIS: I absolutely was.  
16 MR. MURDOCK: No, you were the  
17 hospital's lawyer.  
18 BY MR. MURDOCK:  
19 Q. Do you understand he's the hospital's  
20 lawyer? Do you understand that?  
21 A. Yes.  
22 Q. Do you understand that this man also helped  
23 Mr. Farmer? Do you understand that?  
24 MR. BEMIS: I object to form.  
25

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1 BY MR. MURDOCK:  
2 Q. Do you understand that?  
3 A. He's the hospital lawyer.  
4 Q. Do you understand he helped Mr. Farmer as  
5 well?  
6 MS. HUETH: I object to form.  
7 Argumentative. Harassing.  
8 THE WITNESS: What's your point?  
9 BY MR. MURDOCK:  
10 Q. Well, my point is, are you going to listen  
11 to him? Do you want him to represent you?  
12 MR. BEMIS: I object to form.  
13 MS. HUETH: Objection. Argumentative.  
14 BY MR. MURDOCK:  
15 Q. Or do you want your own lawyer?  
16 MR. BEMIS: I'm going to object to  
17 form. He is represented by counsel.  
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:  
24 Q. Sir, let's go back to the meeting, okay?  
25 A. Okay.

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1 Q. First you said to me you didn't remember  
2 the conversation. Then your lawyer jumped in  
3 afterwards and said, "No, I don't want you to talk  
4 about it."  
5 So what's it going to be? Are you  
6 going to tell me about the conversations, or are you  
7 going to listen to the hospital's lawyer?  
8 MR. BEMIS: I object to form.  
9 Argumentative.  
10 MS. HUETH: Objection. Argumentative.  
11 Harassing. Asked and answered.  
12 BY MR. MURDOCK:  
13 Q. You can answer the question.  
14 A. Again, I do not remember the conversation.  
15 I do not remember the other people in the room.  
16 Q. I didn't ask you that, sir.  
17 A. Okay.  
18 Q. All I asked you was, are you going to  
19 listen to your lawyer, or are you going to tell me  
20 about the conversation? Whatever you remember. If  
21 you don't remember, you don't remember.  
22 A. You can ask me.  
23 Q. Okay. Thank you.  
24 MR. BEMIS: No, no, no. I'm going to  
25 instruct him not to answer.

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1 MR. MURDOCK: No, he's already said --  
2 John, he doesn't have to listen to you. You're not  
3 his lawyer. You're the hospital lawyer. It doesn't  
4 matter. He doesn't have to listen to you, so stop  
5 telling him not to answer.  
6 MR. BEMIS: I understand your position.  
7 MR. MURDOCK: You're coaching him not  
8 to answer the question.  
9 MR. BEMIS: As his attorney, yes.  
10 MR. MURDOCK: You're not his attorney.  
11 He already said that at the beginning of the  
12 deposition. You didn't jump in then.  
13 MR. BEMIS: He's represented by  
14 counsel. He's already told you that he's accepted  
15 the representation.  
16 MR. MURDOCK: No, he didn't actually.  
17 BY MR. MURDOCK:  
18 Q. Have you accepted Mr. Bemis'  
19 representation?  
20 A. I want him to be here, yes.  
21 Q. I understand that. Do you want him to be  
22 your lawyer?  
23 A. Do I need a lawyer? That's my question.  
24 Q. You tell me.  
25 A. I don't think I need a lawyer.

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1 Q. Okay. Good. So you don't need John,  
2 right?  
3 MR. BEMIS: I'm going to object to  
4 form.  
5 THE WITNESS: I'd like John to be here.  
6 BY MR. MURDOCK:  
7 Q. I understand. He is here. He's sitting  
8 next to you. He's not going anywhere.  
9 MR. SILVESTRI: I'm just going to  
10 object.  
11 You're asking this guy, who has no  
12 legal understanding if he needs a lawyer -- he's  
13 saying he doesn't know. I'm getting a little  
14 concerned now about where we're going with this. I'm  
15 just going to put that on the record.  
16 MR. MURDOCK: I understand.  
17 MR. BEMIS: I join in the objection.  
18 MR. SILVESTRI: And I understand the  
19 disagreement you have with Mr. Bemis, but now the  
20 witness -- he doesn't understand if he's represented  
21 or not. And he's asking, "Do I need a lawyer?" And  
22 I'm feeling a little uncomfortable.  
23 THE WITNESS: I'm very uncomfortable.  
24 BY MR. MURDOCK:  
25 Q. Okay. Well, I don't know whether you need

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1 a lawyer or not. That's none of my business. You  
2 certainly have a right to have your own personal  
3 lawyer here. That's up to you.  
4 If you'd like to get your own  
5 personal lawyer, I have no problem stopping this  
6 deposition right now so you can go ahead and get your  
7 own personal lawyer. I don't know whether you need  
8 one or not. I can't give you that opinion.  
9 I am the plaintiff's lawyer. Mr.  
10 Bemis is the hospital's lawyer. So it's up to you  
11 what you want to do.  
12 MR. BEMIS: Can I take a break real  
13 quick and speak to the witness?  
14 MR. MURDOCK: I'm not taking a break.  
15 MR. BEMIS: There's not a question  
16 pending.  
17 MR. MURDOCK: I'm not taking a break,  
18 so it's up to you what you want to do.  
19 MS. HUETH: Let's take a break.  
20 THE WITNESS: I need to go to the  
21 bathroom.  
22 MR. MURDOCK: If you're going to take a  
23 break, that's fine. But I will tell you something.  
24 If you speak with anybody, I'm going to ask you about  
25 that conversation, because it's not privileged.

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1 So go ahead. Take your break.  
2 (Recess.)  
3 MR. MURDOCK: Okay. We can go back on.  
4 BY MR. MURDOCK:  
5 Q. Sir, during your break did you have any  
6 conversations with anybody?  
7 A. I just told John I feel uncomfortable.  
8 Q. And what did John say to you?  
9 A. I'm doing okay.  
10 Q. Okay. You're doing great.  
11 So getting back to where we were,  
12 tell me about the conference that was had at the  
13 hospital that you believe was more likely than not  
14 just a few days after the arrest of Mr. Farmer,  
15 between you, Mr. Bemis, and two other individuals.  
16 MR. BEMIS: I'm going object that it  
17 calls for attorney-client privilege and instruct him  
18 not to answer.  
19 BY MR. MURDOCK:  
20 Q. Are you going to follow Mr. Bemis'  
21 instruction?  
22 A. Yes, I am.  
23 Q. Okay. Very good. And I represent to you  
24 that you may be coming back here, and I'm not paying  
25 for it. So that being said, we can go that route.

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1 Now, sir, you said the meeting was  
2 about ten minutes, is that correct?  
3 A. I don't know exactly what time, but  
4 approximately ten minutes.  
5 Q. And were any documents shown to you at all?  
6 A. I don't recall any documents.  
7 Q. Did you show any documents to them?  
8 A. I did not show any documents to them.  
9 Q. Were you asked anything about Mr. Farmer?  
10 MR. BEMIS: I'm going to object. That  
11 calls for attorney-client privilege and I instruct  
12 him not to answer.  
13 BY MR. MURDOCK:  
14 Q. Are you going to listen to Mr. Bemis?  
15 A. Yes, I am.  
16 Q. Did you ask why you were called into the  
17 meeting?  
18 MR. BEMIS: I'm going to make the same  
19 objection and instruct him not to answer.  
20 BY MR. MURDOCK:  
21 Q. Are you going to listen to Mr. Bemis?  
22 A. Yes, I am.  
23 Q. How did you get called into the meeting?  
24 A. They called my department while I was at  
25 work.

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1 Q. Who is "they?"  
2 A. I don't know who that was on the phone.  
3 Q. Someone called your department?  
4 A. Yeah.  
5 Q. And were you told something about that?  
6 A. They told me there's a meeting -- that some  
7 people want to meet you, so I went to that conference  
8 room.  
9 Q. To meet you just to say hello? Did you  
10 know what the topic was before you even got there?  
11 A. No, I didn't know.  
12 Q. So you had no idea what this was about?  
13 A. No.  
14 Q. And were you nervous?  
15 A. No, I don't think so.  
16 Q. Were you uncomfortable?  
17 A. No.  
18 Q. Who told you that there was a meeting?  
19 A. The person on the phone.  
20 Q. Who was that?  
21 A. I don't know.  
22 Q. What time was the meeting?  
23 A. I don't know.  
24 Q. Was it during your usual shift?  
25 A. During my usual shift, yes.

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1 Q. And what time was your usual shift?  
2 A. I usually start at 9:00 -- I'm sorry, at  
3 7:00 p.m. to 7:00 a.m.  
4 Q. Okay. So it was during your usual shift  
5 that this meeting took place, correct?  
6 A. I believe so. Again, I don't know what  
7 time, but it was when I was working, yes.  
8 Q. Okay. And since you work between 7:00 p.m.  
9 and 7:00 a.m., which is the nightshift, it would have  
10 been during that time, correct?  
11 A. Yes, sir.  
12 Q. And did you know about the meeting prior to  
13 coming on shift that night?  
14 A. No.  
15 Q. Do you know who Mr. Farmer was?  
16 A. Yes.  
17 Q. Or is. Do you know who Steven Farmer is?  
18 A. I've worked with him a few nights, yeah.  
19 Q. Tell me about Steven.  
20 A. He's a good worker.  
21 Q. A good CNA, right?  
22 A. Yeah.  
23 Q. Always follows instructions?  
24 A. Yes.  
25 Q. And those instructions were given by you,



<p style="text-align: right;">Page 45</p> <p>1 is that correct?</p> <p>2 MR. BEMIS: I object to form.</p> <p>3 Misstates testimony.</p> <p>4 BY MR. MURDOCK:</p> <p>5 Q. Go ahead.</p> <p>6 A. What was the question again?</p> <p>7 Q. Were those instructions always given by</p> <p>8 you?</p> <p>9 A. He can be asked by different nurses.</p> <p>10 Q. It was a bad question on my part.</p> <p>11 Did you ever instruct Steven to do</p> <p>12 something?</p> <p>13 A. The main thing is to stock the rooms.</p> <p>14 Q. He was good at that, right?</p> <p>15 A. Yeah.</p> <p>16 Q. You told him to stock the rooms, and he</p> <p>17 stocked the rooms, right?</p> <p>18 A. Yeah.</p> <p>19 Q. Is that a yes?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever tell him to anything with any</p> <p>22 patients at all?</p> <p>23 A. When I needed a patient transported to a</p> <p>24 room upstairs, I usually asked him also.</p> <p>25 Q. And he did that, right?</p>	<p style="text-align: right;">Page 47</p> <p>1 scrubs.</p> <p>2 Q. Oh, okay. So you just wear the same scrubs</p> <p>3 throughout the entire day?</p> <p>4 A. Yeah.</p> <p>5 Q. And then you bring them home and they get</p> <p>6 washed, right?</p> <p>7 A. Correct.</p> <p>8 Q. Or whatever you want to do with them,</p> <p>9 right?</p> <p>10 A. (Witness nods.)</p> <p>11 Q. Is that a yes?</p> <p>12 A. Yes.</p> <p>13 Q. Did Steven wear kind of funny-looking</p> <p>14 scrubs?</p> <p>15 MR. BEMIS: I object to form.</p> <p>16 BY MR. MURDOCK:</p> <p>17 Q. Well, let me explain to you. I've seen</p> <p>18 scrubs with cartoon characters on them, some of the</p> <p>19 pediatric people might wear that kind of stuff.</p> <p>20 Did Steven wear that, or were they</p> <p>21 just kind of one-colored?</p> <p>22 A. I don't remember what he was wearing. I'm</p> <p>23 pretty sure it's nothing like cartoons on it. I</p> <p>24 don't remember that.</p> <p>25 Q. Okay. And did you ever instruct Steven to</p>
<p style="text-align: right;">Page 46</p> <p>1 A. Yes.</p> <p>2 Q. He didn't say, "Oh, I want the agency</p> <p>3 manager to be here and tell me what to do," right?</p> <p>4 MR. BEMIS: I object to form.</p> <p>5 THE WITNESS: No.</p> <p>6 BY MR. MURDOCK:</p> <p>7 Q. So you told him what to do and he did it,</p> <p>8 right?</p> <p>9 A. Yes.</p> <p>10 Q. Can you describe Steven Farmer?</p> <p>11 A. He showed up to work and does his job.</p> <p>12 Q. What did his badge look like?</p> <p>13 A. It's got a face on it, his first name, and</p> <p>14 "CNA," and I believe that there was an agency badge,</p> <p>15 if I recall correctly.</p> <p>16 Q. Are those different colors?</p> <p>17 A. Still a white one.</p> <p>18 Q. Oh, okay. What would he wear to work?</p> <p>19 A. What would he wear to work? Scrubs. I</p> <p>20 don't remember what he was wearing.</p> <p>21 Q. Okay. Well, at Centennial Hills when it</p> <p>22 opened, did you all get scrubs that were given to you</p> <p>23 by Centennial, and then they'd wash them at</p> <p>24 Centennial?</p> <p>25 A. No, not in the ER. You just buy your own</p>	<p style="text-align: right;">Page 48</p> <p>1 do anything at all with EKG leads?</p> <p>2 A. Usually the nurse who has that patient will</p> <p>3 ask the CNA to help.</p> <p>4 Q. To help, or actually to do them?</p> <p>5 A. To help her.</p> <p>6 Q. Or him?</p> <p>7 A. If he was instructed to do an EKG, he'll do</p> <p>8 it.</p> <p>9 Q. Okay. Had you ever instructed Steven to do</p> <p>10 an EKG?</p> <p>11 A. I don't remember. I'm pretty sure I</p> <p>12 probably did. The ER is a busy place.</p> <p>13 Q. Is that something that CNAs do always at</p> <p>14 Centennial Hills? They do EKGs if they're instructed</p> <p>15 to do so?</p> <p>16 MR. BEMIS: I object to form. Go</p> <p>17 ahead.</p> <p>18 MR. SILVESTRI: Objection. Lacks</p> <p>19 foundation.</p> <p>20 THE WITNESS: As far as doing what</p> <p>21 again?</p> <p>22 BY MR. MURDOCK:</p> <p>23 Q. EKGs.</p> <p>24 A. Usually the techs in the ER will do the</p> <p>25 EKGs, and Steve is not a tech. He's a CNA.</p>

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1 Q. So why would you then instruct him to do an  
2 EKG?  
3 A. I didn't tell him to do an EKG.  
4 Q. I thought you said you did.  
5 A. You're talking about the heart monitors.  
6 Q. Oh, okay. So there is a difference between  
7 the heart monitors and an EKG?  
8 A. A 12-lead EKG, yeah, and then there's the  
9 heart monitors.  
10 Q. Oh, okay. The heart monitors, are those  
11 put on by CNAs generally?  
12 A. They can help the nurse put a heart  
13 monitor, if the patient needs the treatment.  
14 Q. Well, of course. You're not going to put  
15 them on a patient who doesn't need it, right?  
16 A. Exactly.  
17 Q. Does the nurse have to be there while the  
18 CNA is doing something with those leads?  
19 MR. BEMIS: I object to form. Go ahead  
20 and answer.  
21 MR. SILVESTRI: Form.  
22 THE WITNESS: The nurse should be there  
23 to receive the patient in the room.  
24 BY MR. MURDOCK:  
25 Q. But as the CNA is doing something with the

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1 heart leads, should the nurse stay in the room?  
2 A. No, not necessarily stay in the room.  
3 Q. So in other words, the CNA is allowed to do  
4 that, right?  
5 A. Yes.  
6 Q. So that's one job that the CNA is allowed  
7 to do at Centennial Hills Hospital. They're allowed  
8 to put on the heart leads, is that correct?  
9 MR. SILVESTRI: Objection. It lacks  
10 foundation.  
11 THE WITNESS: What was the question  
12 again?  
13 BY MR. MURDOCK:  
14 Q. The CNAs at Centennial Hills Hospital are  
15 allowed to put on the heart leads, is that correct?  
16 MR. SILVESTRI: Same objection.  
17 THE WITNESS: In the ER, yes.  
18 BY MR. MURDOCK:  
19 Q. Have you ever been told that's what they're  
20 allowed to do, or is that something they just do?  
21 A. We usually show that person how to do it,  
22 as far as putting heart monitors and putting a gown  
23 on.  
24 Q. Okay.  
25 MR. SILVESTRI: Can we just -- I don't

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1 understand what a heart monitor is.  
2 MR. MURDOCK: Oh, okay.  
3 MR. SILVESTRI: Can we distinguish that  
4 from the 12-lead EKG?  
5 MR. MURDOCK: Okay. I thought we did,  
6 but I'll go back. No problem.  
7 BY MR. MURDOCK:  
8 Q. Go back for a second and help me out a  
9 little bit, because I don't understand something.  
10 Could you explain the difference  
11 between what an EKG is and what the heart leads are?  
12 A. There's a 12-lead EKG. That's a test that  
13 we perform if a patient shows symptoms of any chest  
14 pain -- anything cardiac related. Or sometimes just  
15 a basic workup.  
16 Sometimes ER doctors will order a  
17 12-lead EKG and they put 12 leads on the patient's  
18 chest, and then they'll run the quick 12 EKG and  
19 that's done on paper.  
20 Versus the heart monitor, the  
21 patient will lay on the gurney, put a gown on, and we  
22 will put 3 leads. At least in the ER it's 3 leads --  
23 the chest, and the rib area here. And then the heart  
24 monitor will pick up the heart rhythm.  
25 Q. Let me see if I understand something you

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1 just said.  
2 So the heart leads, where do they  
3 go on a chest? And specifically, if you could  
4 describe for me with a woman -- where would the leads  
5 go on a woman?  
6 MR. SILVESTRI: For the heart monitor?  
7 MR. MURDOCK: Yeah.  
8 MR. SILVESTRI: Thank you.  
9 THE WITNESS: Over the right chest.  
10 BY MR. MURDOCK:  
11 Q. You're pointing to approximately --  
12 A. The clavicle region.  
13 Q. The clavicle region. Okay.  
14 A. Right clavicle, left clavicle, and then the  
15 left lateral rib area right here. (Indicating.)  
16 Q. Now, if a woman has breast tissue, does the  
17 breast need to be moved in order to place that lead?  
18 MR. BEMIS: I object to form.  
19 Incomplete hypothetical.  
20 MR. SILVESTRI: For the heart monitor?  
21 MR. MURDOCK: Yeah. All these  
22 questions are for the heart monitor, Jim.  
23 THE WITNESS: I go lateral. I go here.  
24 (Indicating.)  
25

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1 BY MR. MURDOCK:  
2 Q. Okay. Does the patient have to undo their  
3 gown in order to get that lead on?  
4 MR. BEMIS: I object to form.  
5 BY MR. MURDOCK:  
6 Q. Or do you do that lead with the gown  
7 closed?  
8 MR. BEMIS: Incomplete hypothetical.  
9 THE WITNESS: It can go either way.  
10 BY MR. MURDOCK:  
11 Q. How would you put the lead on the rib area  
12 with the gown closed?  
13 A. The opening on the gown is typically in the  
14 back, so we just pull the gown up and go underneath.  
15 Q. So that would be one way to do it, right?  
16 A. Yeah.  
17 Q. And are male CNAs -- do they put heart  
18 leads onto female patients at Centennial Hills  
19 Hospital?  
20 A. If they're instructed by the nurse.  
21 Q. Do leads need to be checked from time to  
22 time?  
23 A. That's ultimately the responsibility of the  
24 nurse, to make sure the lead placements are correct.  
25 Q. But do they need to be checked from time to

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1 time?  
2 A. Yes.  
3 Q. And CNAs are allowed to do that, right?  
4 MR. BEMIS: I object to form.  
5 MR. SILVESTRI: Objection. Lacks  
6 foundation.  
7 MR. MURDOCK: Well, strike that.  
8 BY MR. MURDOCK:  
9 Q. CNAs do that at Centennial Hills Hospital,  
10 correct?  
11 MR. SILVESTRI: Same objection.  
12 THE WITNESS: As far as what?  
13 BY MR. MURDOCK:  
14 Q. Checking heart leads.  
15 A. Why would they be checking the heart leads?  
16 Q. I don't know. If the patient moves. I  
17 don't know.  
18 A. I cannot answer that. I don't know. I  
19 don't know the answer to that.  
20 Q. So heart leads, at least in your view,  
21 never need to be checked, is that right?  
22 MR. BEMIS: I object to form.  
23 Misstates testimony.  
24 THE WITNESS: Again, it's the nurse's  
25 responsibility to check the placement of the heart

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1 leads.  
2 BY MR. MURDOCK:  
3 Q. Was Margaret Wolfe fired?  
4 MR. BEMIS: I object to form.  
5 THE WITNESS: I don't know officially,  
6 but she did leave the hospital.  
7 BY MR. MURDOCK:  
8 Q. I understand that. Was she fired?  
9 A. I don't know officially.  
10 Q. I don't care about officially. Do you  
11 believe she was fired?  
12 MR. BEMIS: I object to form. Asked  
13 and answered.  
14 THE WITNESS: She left the hospital.  
15 BY MR. MURDOCK:  
16 Q. How did she leave the hospital?  
17 A. People didn't know until she left. I'm  
18 still wondering what's going on.  
19 Q. You know who Margaret Wolfe is, right?  
20 A. Yes.  
21 Q. Margaret Wolfe was a nurse at Centennial  
22 Hills Hospital, right?  
23 A. Correct.  
24 Q. You worked with her for a couple of years,  
25 is that correct?

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1 MR. BEMIS: I object to form.  
2 THE WITNESS: Yes.  
3 BY MR. MURDOCK:  
4 Q. In your time working with Margaret Wolfe at  
5 the hospital, did you know her to be a liar?  
6 MR. BEMIS: I object to form.  
7 Argumentative.  
8 THE WITNESS: I don't know how to  
9 answer that.  
10 BY MR. MURDOCK:  
11 Q. Well, did she ever lie to you?  
12 A. How would I know if she's lying to me?  
13 Q. Did you ever catch her in a lie?  
14 A. No.  
15 Q. Did you ever believe her to make up  
16 stories?  
17 A. I don't know how to answer that.  
18 Q. Well, it's answered "yes" or "no."  
19 A. I don't think she would make up stories.  
20 Q. Did you know her to be an honest  
21 individual?  
22 MR. BEMIS: I object to form.  
23 MR. MURDOCK: Strike that.  
24 BY MR. MURDOCK:  
25 Q. Did you believe her to be an honest

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1 individual?  
2 A. I just worked with her.  
3 Q. I understand. But in your working with  
4 her, did she ever do anything that would lead you to  
5 believe that she was not an honest individual?  
6 A. No.  
7 Q. You testified before that you didn't know  
8 why Margaret left the hospital, right?  
9 A. Yeah, not officially. Everything is  
10 rumors. I don't like to listen to rumors.  
11 Q. Tell me about some of the rumors.  
12 A. I don't recall.  
13 Q. You don't recall any?  
14 A. The rumors? There were rumors she got  
15 fired, but nobody will tell you. It's always very  
16 private. It's very personal, so I don't want to --  
17 Q. Well, what have you heard?  
18 A. She's gone. She left.  
19 Q. I understand. Did you hear any rumors  
20 about why?  
21 A. I didn't listen to rumors.  
22 Q. I understand you didn't listen, but did you  
23 hear them?  
24 A. I didn't listen to them.  
25 Q. But did you hear them?

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1 A. No.  
2 Q. So you have no idea. You never heard any  
3 scuttlebutt around the hospital about why she left at  
4 all?  
5 A. No.  
6 Q. Nothing at all?  
7 A. No.  
8 Q. It's just an absolute mystery, right?  
9 A. Correct.  
10 Q. Okay. Outside of speaking with Mr. Bemis  
11 and these two people at that conference that you had,  
12 that you believe was more likely than not a few days  
13 after the arrest of Mr. Farmer, had you ever spoken  
14 to anybody else --  
15 A. No.  
16 Q. Hold on. -- had you ever spoken to anybody  
17 else regarding this matter?  
18 A. No.  
19 Q. Outside of that one conference that was in  
20 May -- well, that was more likely than not around the  
21 time of the arrest, can you tell me, when was the  
22 next time you heard anything at all about Mr. Farmer?  
23 A. In Yahoo news.  
24 Q. Is that something you looked up or  
25 researched?

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1 A. I always look at the news every day --  
2 every morning.  
3 Q. And what did you hear about Mr. Farmer in  
4 Yahoo news?  
5 A. There's problems with Farmer and the  
6 hospital and patients.  
7 Q. So what you're telling me is you didn't  
8 know that before the conference?  
9 A. I didn't know that.  
10 Q. You didn't know that after the conference?  
11 A. After the conference?  
12 Q. Yeah.  
13 A. After the conference, yes, because I've  
14 seen the news.  
15 Q. Well, wait a minute. You said you saw the  
16 news -- let me restate the question.  
17 You saw the news after the  
18 conference, correct?  
19 A. Maybe before the conference.  
20 Q. Okay. So if you saw the news before the  
21 conference, you knew there was a problem with  
22 Mr. Farmer, right?  
23 A. Correct.  
24 Q. And when you saw the news with Mr. Farmer,  
25 did that surprise you?

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1 MR. BEMIS: I object to form.  
2 THE WITNESS: Can you say -- what's the  
3 question again?  
4 BY MR. MURDOCK:  
5 Q. When you saw the news about Mr. Farmer on  
6 Yahoo, what did you do about it, if anything?  
7 A. First of all, I can't believe it. I was  
8 surprised.  
9 Q. Okay. And what did you hear on the news,  
10 or read, whatever it was?  
11 A. Again, something happened with the patients  
12 in the hospital with Farmer.  
13 Q. Something like what?  
14 A. Something not right.  
15 Q. Something not right sexually, or are we  
16 talking he gave the wrong medicine, he put the wrong  
17 lead?  
18 A. I believe it was still early on. Something  
19 inappropriate with patients.  
20 Q. Inappropriate sexually?  
21 A. I'm not sure about the sexual part, but  
22 it's inappropriate, yeah.  
23 Q. Okay. And you believe that was before the  
24 conference?  
25 A. Yes.

<p style="text-align: right;">Page 61</p> <p>1 Q. And after the conference did you come to 2 know what the exact problem was with Mr. Farmer? 3 MR. BEMIS: I object to form. I'm 4 going to instruct him not to answer anything that he 5 learned from discussion with counsel. 6 BY MR. MURDOCK: 7 Q. After the conference were you aware that it 8 was alleged that Mr. Farmer had sexually assaulted 9 several women? 10 MR. BEMIS: Again, I'm going to 11 instruct him not to answer anything that he learned 12 in the confidence of a conversation he held with this 13 attorney. 14 BY MR. MURDOCK: 15 Q. Outside of the conference itself. 16 A. What was the question again? 17 Q. After the conference -- so in other words, 18 let's talk about time. Let's set this up a little 19 bit. 20 You've got, you believe -- and 21 tell me if I'm wrong, this is what I thought I heard 22 you say -- before the conference you knew there was 23 an issue with Mr. Farmer being inappropriate with 24 patients, and you knew that from looking at Yahoo 25 news.</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. Okay. 2 A. As far as exact conversation, I don't know. 3 Q. But they were talking about an incident, 4 right? 5 A. Correct. 6 Q. Who was talking about it? Do you remember 7 that? 8 A. Again, you hear it in the background. I 9 don't know who was behind me. I mean when you work 10 in the ER, it's so busy. 11 Q. Was Ms. Cagnina a patient of yours? 12 A. I don't recall that name. 13 Q. I'm not asking for specific communications 14 between you and Mr. Bemis and these two people who we 15 don't know who they are. 16 What was the subject? Was it 17 Mr. Farmer? 18 A. Yes. 19 Q. Now, you know Mr. Farmer was convicted, 20 right? 21 A. Yes. 22 Q. Do you remember when he was convicted? 23 A. No. As far charges? 24 Q. No, when he was actually convicted? 25 A. No, I don't. I don't recall.</p>
<p style="text-align: right;">Page 62</p> <p>1 A. In the news, Yahoo, yes. 2 Q. That was before the conference? 3 A. Yes. 4 Q. Okay. 5 A. I'm not a hundred percent, but yeah. 6 Q. Okay. And after you found out about this 7 issue with Mr. Farmer from Yahoo news before the 8 conference, did you talk to anybody about it? 9 A. No. Before the conference, no. 10 Q. Did you talk to any of the staff at the ER 11 about it? 12 A. Again, rumors, but I don't listen to 13 rumors. 14 Q. And I'm talking before the conference. 15 A. No. I don't recall. 16 Q. So in other words, after you read this on 17 Yahoo news you went to work and you didn't discuss 18 anything at all with anybody? 19 A. I don't remember the conversations I had 20 then. I'll be honest with you. 21 Q. Well, I hope you're being honest with me. 22 A. I don't remember the exact conversations, 23 but I could hear people talking about it. 24 Q. And what were they talking about? 25 A. The incident.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. In between the time at this conference with 2 Mr. Bemis and the two individuals we don't know who 3 they are, that you believe was more likely than not 4 right around the time of the arrest of Mr. Farmer, 5 and the meeting with Mr. Bemis yesterday, had you 6 ever discussed Mr. Farmer with anyone else? 7 A. No. 8 Q. Had you ever discussed Mr. Farmer in 9 between that same time -- between after the 10 conference and yesterday, had you ever discussed 11 Mr. Farmer with Ms. Wolfe? 12 A. No. I haven't seen Ms. Wolfe in a long 13 time. 14 Q. I understand. 15 A. No. 16 Q. So you didn't? 17 A. No. 18 Q. Was there a Kim who worked in the ER at 19 Centennial Hills? 20 A. What's the last name? 21 Q. I don't know. 22 A. There's a lot of Kims. Very popular name. 23 MR. SILVESTRI: First name or last? 24 MR. MURDOCK: First. 25 THE WITNESS: You've got to give me</p>

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

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1 yesterday?  
2 A. Before the week of April 22nd.  
3 Q. Okay. So yesterday was the first time you  
4 heard about going to meet with Mr. Bemis, is that  
5 correct?  
6 MR. BEMIS: I object to form.  
7 THE WITNESS: Yesterday, yeah.  
8 BY MR. MURDOCK:  
9 Q. As far as this deposition?  
10 A. Yeah.  
11 Q. So you didn't know anything about meeting  
12 with Mr. Bemis until yesterday, is that correct?  
13 A. Correct.  
14 Q. And you said Amanda told you you were going  
15 to have a meeting with Mr. Bemis, is that correct?  
16 A. Correct.  
17 Q. And who is this Amanda?  
18 A. Again, I believe she works in the risk  
19 management.  
20 Q. And did she tell you to call Mr. Bemis?  
21 A. No.  
22 Q. What did she tell you?  
23 A. To meet him in the office.  
24 Q. What office?  
25 A. Where Amanda is located.

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1 Q. In the risk management office?  
2 A. I believe so, yeah. It just says "Office"  
3 on the door.  
4 Q. But you believe that's the risk management  
5 office?  
6 A. It's risk management.  
7 Q. And who was at that meeting?  
8 A. John and I.  
9 Q. Nobody else?  
10 A. Nobody else.  
11 Q. And you said that meeting lasted about how  
12 long?  
13 A. Quick. Maybe five or ten minutes at the  
14 most.  
15 Q. So in between the time of the first  
16 conference that you said occurred more than likely  
17 around the time of the arrest of Mr. Farmer, until  
18 yesterday, had you ever spoken with Mr. Bemis again?  
19 A. No.  
20 Q. Had you ever spoken to anybody from Mr.  
21 Bemis' law firm?  
22 MR. BEMIS: I object to form. Calls  
23 for speculation.  
24 THE WITNESS: I don't think so.  
25

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1 BY MR. MURDOCK:  
2 Q. Had you ever spoken with any lawyers at all  
3 from the hospital?  
4 MR. BEMIS: Same objection.  
5 THE WITNESS: No.  
6 BY MR. MURDOCK:  
7 Q. Have you ever spoken to anybody from risk  
8 management at the hospital regarding this matter?  
9 A. As far as what time span again?  
10 Q. Between the time after the first conference  
11 you had, and yesterday.  
12 A. Well, again, Amanda brought the documents  
13 the week before April 22nd.  
14 Q. Okay. Let's move it to that date then.  
15 From the time of the first  
16 conference that you said occurred more likely than  
17 not around the time of arrest of Mr. Farmer, until  
18 you received the documents from Amanda around April  
19 22nd, or the week before April 22nd, had you ever  
20 spoken to anybody else --  
21 A. No.  
22 Q. Hold on. -- anybody else at all? Mr.  
23 Bemis, any lawyers, any risk management people --  
24 anybody at all regarding Mr. Farmer?  
25 A. No.

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1 Q. Okay. Are you on any medication?  
2 A. High blood pressure pills.  
3 Q. Anything else besides that?  
4 A. Fish oil.  
5 Q. Anything else besides that?  
6 A. Vitamin D. Why are you asking?  
7 Q. Let me ask it this way. I'm not trying to  
8 get personal. I don't really care about what you  
9 take. All I want to make sure is that you're not  
10 taking any medication that may affect your memory.  
11 A. No.  
12 Q. So you're not taking anything that may  
13 affect your memory?  
14 A. No. Whatever is affecting me is old age.  
15 Q. Well, we all have that issue.  
16 A. Right.  
17 Q. I'm just talking, for instance, if you were  
18 taking -- I don't know, Valium, that may affect your  
19 memory.  
20 A. No narcotics at all.  
21 Q. Okay. If you regularly smoke marijuana,  
22 does that affect your memory?  
23 A. I don't smoke marijuana.  
24 Q. These are questions we've got to ask now.  
25 So there's no issues with your

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1 memory, right?

2 A. No.

3 Q. Just age like everybody else, correct?

4 A. Yes, and I hope it's normal for me.

5 Q. But you can't remember when the meeting

6 was, right?

7 A. Which meeting?

8 Q. Well, strike that. We'll go back.

9 Do you recall having a

10 conversation with Ms. Wolfe about Mr. Farmer?

11 A. The only thing I can remember, as far as

12 whatever, when she told me -- and I believe I was the

13 relief charge nurse that night, because she came up

14 to me to let Steve know that we don't needlessly need

15 to put heart monitors on all patients. She said for

16 me to let him know that.

17 So I pulled him aside and I told

18 him, "Knock before you enter a room. You ask the

19 nurse who has that patient, 'Do you need a heart

20 monitor or not?'"

21 As far as that conversation, I

22 think that's what I told him, and that's what we

23 talked about with Margaret, as far as her wanting me

24 to tell Steve.

25 Q. So she wanted you to tell Steve that every

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1 patient didn't need a heart monitor?

2 A. Correct.

3 Q. Did she tell you anything else?

4 A. No.

5 Q. No, or you just don't remember?

6 A. I don't remember, as far as the exact

7 conversation.

8 Q. Do you remember telling Ms. Wolfe to watch

9 Steven around female patients?

10 MR. BEMIS: I object to form.

11 THE WITNESS: I don't recall that, no.

12 BY MR. MURDOCK:

13 Q. Do you remember telling Ms. Wolfe that you

14 were concerned about Steven, because he was very

15 overly attentive with female patients?

16 MR. BEMIS: I object to form.

17 THE WITNESS: I don't recall that

18 conversation.

19 BY MR. MURDOCK:

20 Q. Do you remember telling Ms. Wolfe that you

21 were concerned because he Farmer was overly attentive

22 with female patients and very anxious to connect them

23 to the monitors and disconnect them from the

24 monitors?

25 A. I don't recall that conversation.

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1 Q. Do you recall telling Ms. Wolfe that you

2 were concerned about Mr. Farmer because he was very

3 anxious to connect and disconnect them from heart

4 monitors, which would require him to reach into their

5 clothing?

6 A. I don't remember any conversation.

7 Q. Okay. You're not saying it didn't happen,

8 you're saying you just don't remember, right?

9 A. I don't remember.

10 Q. If Ms. Wolfe told the police that you said

11 that, do you have any reason to disagree with what

12 Ms. Wolfe said?

13 MR. BEMIS: I object to form.

14 THE WITNESS: I don't know how to

15 answer that.

16 BY MR. MURDOCK:

17 Q. Well, you just don't remember, right?

18 A. I don't remember, yeah.

19 MR. MURDOCK: Let's mark this.

20 (Plaintiff's Exhibit 1 marked.)

21 BY MR. MURDOCK:

22 Q. First of all, showing you what's been

23 marked as Plaintiff's Exhibit 1, have you ever seen

24 that document before?

25 A. No.

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1 Q. Have you ever been told it existed before?

2 A. No.

3 Q. Do you see on the top it says, "Name of

4 Person Giving Statement?"

5 A. Yes.

6 Q. Who is that?

7 A. Margaret Wolfe.

8 Q. And as you go down to the first line --

9 well, in the first paragraph after the "Q." you'll

10 see it says, "The time is approximately 0758 hours on

11 the 30th of May, 2008." Do you see that?

12 A. Yes.

13 Q. Now, if you go to page 2, do you see where

14 it says -- kind of in the middle of the page it says

15 "Q. And where do, where, what do you do for

16 Centennial Hills Hospital?" Do you see that?

17 A. Yes.

18 Q. Ms. Wolfe said, "I'm an ER nurse." Do you

19 see that?

20 A. Yes.

21 Q. Is that true?

22 A. Margaret Wolfe is an ER nurse.

23 Q. And at least at the time she was an ER

24 nurse at Centennial Hills Hospital, correct?

25 A. Yes.



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1 Q. So that was true, right?  
2 A. Yes.  
3 Q. Let's go down, and if you go down sort of  
4 towards the bottom it says, "Q. Okay. And what was  
5 Steven Farmer's job?" Do you see that?  
6 A. Yes.  
7 Q. And her answer was, "He was a CNA.  
8 Contracted out through an agency." Do you see that?  
9 A. Yes.  
10 Q. Was that true?  
11 A. Yes.  
12 Q. And still on page 2 at the bottom, the  
13 question was asked, "And what would you say his job  
14 duties were?"  
15 And if you turn to the next page  
16 she states, "Um, he was to assist the nurses with  
17 patient care, taking them to the bathroom, possibly  
18 changing their clothing, cleaning any messes that  
19 patient, you know, may have. Just general assistance  
20 in patient care. Transporting patients to and from  
21 different units." Isn't that true?  
22 A. Yes.  
23 Q. So she answered that truthfully?  
24 A. Yeah.  
25 Q. Where is the nurses' station in the ER at

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1 Centennial Hills? In other words, is it in the  
2 middle?  
3 A. I call it the middle, yes.  
4 Q. And all the rooms would be around it, is  
5 that correct?  
6 A. Yeah, it surrounds the nursing station.  
7 Q. Do you recall Ms. Wolfe telling you about  
8 an incident where Mr. Farmer had exposed a female  
9 patient's breasts where he was allegedly checking  
10 monitor placements?  
11 A. I don't recall any conversation like that.  
12 Q. So in other words, you just don't remember  
13 it?  
14 A. I don't remember.  
15 Q. But it's possible it did happen, right?  
16 A. I don't remember.  
17 Q. So it's possible it happened, you just  
18 don't remember?  
19 A. I don't remember, yeah.  
20 Q. Okay. If you turn to page 8 -- the pages  
21 are on the top -- do you see where it says, "Q. Did  
22 anybody, um, did you talk to anybody about this?"  
23 And she says, "I did. I told another male. His name  
24 is Ray Sumera." Do you see that?  
25 A. Yeah.

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1 Q. If she states she told you about what  
2 Mr. Farmer did, would you have any reason to  
3 disbelieve it?  
4 MR. BEMIS: I object to form.  
5 THE WITNESS: I just need to listen to  
6 what she's saying. I mean as far as believing or  
7 not, it depends on --  
8 BY MR. MURDOCK:  
9 Q. Would you have any reason to disagree with  
10 the fact that she told you about this, or do you just  
11 not remember?  
12 A. Told me what? As far as --  
13 Q. What I just said, what Mr. Farmer was doing  
14 with this patient.  
15 A. I don't remember.  
16 Q. Okay. And then she tells the police, "And  
17 I asked him" -- meaning you -- "if you would talk to  
18 him about it, which he told me he did." And you did,  
19 right?  
20 A. I talked to Steve Farmer, yes.  
21 Q. And you told Margaret that you had talked  
22 to him, right?  
23 A. For a follow-up, I probably did tell  
24 Margaret that I talked to him.  
25 Q. You just don't have any memory of it?

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1 A. I don't have any memory.  
2 Q. But you have no reason to disagree with  
3 what she says here, is that correct?  
4 A. Correct.  
5 MR. BEMIS: I object to form.  
6 BY MR. MURDOCK:  
7 Q. You just can't remember?  
8 A. I can't remember.  
9 Q. And then she states, "Okay. Did Ray say --  
10 did Mr. Sumera say anything about what Mr. Farmer's  
11 response was to him?" Her answer was, "No, he did  
12 not."  
13 Do you have any reason to disagree  
14 with what she says there?  
15 A. I don't recall.  
16 Q. You just don't remember, right?  
17 A. Yeah.  
18 Q. Okay. Then she's asked the question, if  
19 you go in the middle of the page it says, "Did uh --  
20 excuse me. Has anybody else in the ER room that  
21 you've worked with ever come to you, or have you ever  
22 talked to anybody that shared similar concerns that  
23 you do about Mr. Farmer?"  
24 And her answer was, "Um, the same  
25 nurse had told me another time that he -- to watch

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1 him around my female patients, that he was concerned  
2 because he was very overly attentive with female  
3 patients, and very anxious to connect them to the  
4 monitors and disconnect them from the monitors, which  
5 would require him to reach into their clothing."  
6 Do you not remember that?  
7 A. No, I don't remember saying that.  
8 Q. But you don't have any reason to disagree  
9 with what she said, you just don't remember?  
10 A. I don't remember that, yeah.  
11 Q. Okay. Was there a nurse by the name of  
12 Julie who worked in the ER at the time?  
13 A. Julie what?  
14 Q. I don't know. Julie who worked the  
15 dayshift.  
16 A. It's seven years. I don't remember.  
17 Q. Do you remember -- outside the one  
18 conversation you talked about with us between you and  
19 Ms. Wolfe, do you remember any other conversations  
20 between you and Ms. Wolfe specifically?  
21 A. No.  
22 Q. If Ms. Wolfe said that you were suspicious  
23 of Mr. Farmer, would you have any reason to disagree  
24 with that statement?  
25 MR. BEMIS: I object to form.

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1 BY MR. MURDOCK:  
2 Q. Or do you just not remember it?  
3 A. As far as suspicions for --  
4 Q. Like what we were talking about before.  
5 A. I would do something else, if it warrants  
6 something be done.  
7 Q. Do you remember having a conversation with  
8 her?  
9 A. No.  
10 Q. So when Ms. Wolfe told the police that you  
11 were very concerned because Farmer was overly  
12 attentive with female patients and very anxious to  
13 connect them to the monitors and disconnect them from  
14 the monitors, which would require him to reach into  
15 their clothing, you said before you just didn't  
16 remember making that statement, is that correct?  
17 A. I don't remember making that statement.  
18 Q. Okay. It's possible you did, you just  
19 don't remember it, right?  
20 A. I don't remember making that statement.  
21 Q. But it's possible you did, right?  
22 A. Possible. I don't think so.  
23 Q. You don't think so?  
24 A. I don't think so, no.  
25 Q. So is Ms. Wolfe lying here?

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1 A. I cannot say. I don't know.  
2 Q. Well, she's either lying or you're lying.  
3 So which is it?  
4 MR. BEMIS: I object to the form of the  
5 question.  
6 THE WITNESS: I don't remember the  
7 conversation.  
8 BY MR. MURDOCK:  
9 Q. So you don't remember the conversation?  
10 A. No, as far as that.  
11 Q. Do you believe that Ms. Wolfe made it up?  
12 A. I don't know that.  
13 Q. Ms. Wolfe told the police this. Do you  
14 believe she was lying to the police when she said  
15 that?  
16 A. I wouldn't know.  
17 MR. BEMIS: I object to form.  
18 BY MR. MURDOCK:  
19 Q. Well, you would know, because you were part  
20 of the conversation.  
21 A. Yeah.  
22 Q. So if you don't remember it, it's one  
23 thing. If you're saying it didn't happen, that's  
24 quite another.  
25 A. Let's put it this way. I don't remember.

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1 Q. Okay. We can live with that.  
2 Now, if you turn to page 13,  
3 towards the bottom there's a question that says,  
4 "Was -- and is Ray a nurse also, or is he" -- and she  
5 answers, "Yes." The question, "Okay." And then she  
6 states, "He's a nurse, and occasionally works as a  
7 charge nurse." Speaking about you.  
8 Is that true?  
9 A. Yes.  
10 Q. She was truthful there, right?  
11 A. Yes.  
12 Q. Okay. Outside of not remembering your  
13 conversations with Ms. Wolfe, do you have any reason  
14 to disagree with any of the statements that Ms. Wolfe  
15 has stated, that I've already told you about?  
16 MR. BEMIS: I object to form. Go ahead  
17 and answer.  
18 THE WITNESS: I don't see any reason.  
19 I mean it's what she said. We'll look at it as that.  
20 BY MR. MURDOCK:  
21 Q. And again, you just don't remember the  
22 conversation?  
23 A. Yes, I don't remember the conversation.  
24 Q. You're not saying it didn't occur?  
25 A. I'm not saying that, yes.

<p style="text-align: right;">Page 85</p> <p>1 Q. Okay. Renato, in between the time of May 2 2008 and now, have you gotten any raises? 3 A. No. Yeah, I'm pretty sure; but lately, no. 4 Q. You said, "Yeah, I'm pretty sure; but 5 lately, no." Tell me about that. 6 A. I'm at the top scale already, I believe. 7 Q. Oh, okay. When did you get to the top 8 scale? Before 2008? 9 A. After. Way after. 10 Q. How long after? 11 A. Maybe the past two years. 12 Q. And in the past two years, that's when you 13 got to the top scale, right? 14 A. Yeah. 15 Q. Did you get any bonuses from the hospital? 16 A. We're not that lucky, no. 17 Q. Do you get vacations? 18 A. Yeah. PTO they call it. 19 Q. And that's per your agreement with them 20 from the beginning, right? 21 A. With the hospital, yes. 22 Q. Are your raises guaranteed? 23 A. No. 24 Q. Are you a member of a union? 25 A. No.</p>	<p style="text-align: right;">Page 87</p> <p>1 Q. Okay. And do you recall what you started 2 at at Centennial Hills back in 2008? 3 A. No. 4 Q. Can you give me an estimate of what you 5 started at? In other words, was it below 40? 6 A. Probably below 40, yeah. 7 Q. Was it below 30? 8 A. I don't know. Maybe between 30 and 40. 9 Q. Okay. Maybe 35? 10 A. Maybe. 11 Q. That's a number in between 30 and 40, 12 right? 13 A. Yeah. 14 Q. So would you agree with me that since 2008 15 your pay has increased approximately at least 16 approximately \$13 an hour or so? 17 A. Yeah, okay. 18 Q. And again, that raise is not guaranteed, 19 right? 20 A. No. 21 Q. Ray, why don't you do me a favor. I want 22 you to look at Exhibit 1. I want you to take your 23 time and I want you to read it. 24 A. Exhibit 1? 25 Q. Yeah, the whole document. I want you to</p>
<p style="text-align: right;">Page 86</p> <p>1 Q. And do you know what percentage your raises 2 are? 3 A. No. 4 Q. From the time you started working at 5 Centennial Hills in 2008 until now, how much of an 6 increase are we talking about? 7 A. I don't remember. 8 Q. Well, are we talking a few bucks, or are we 9 talking several thousand dollars? 10 A. Only a few bucks. 11 Q. A few bucks per hour? 12 A. Yeah, per hour. 13 Q. But that can grow to -- 14 A. Yeah, but I don't remember the last raise I 15 had. It's been awhile. 16 Q. Because you're at the top? 17 A. Yeah. 18 Q. What's the bottom and what's the top? 19 A. I don't know that. 20 Q. What's the top? 21 A. I guess where I'm at. 22 Q. What is it? 23 A. Maybe 49. 24 Q. 49 what? 25 A. \$49 an hour. That's base pay.</p>	<p style="text-align: right;">Page 88</p> <p>1 read it, okay? 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 22 for speculation. To the extent you know, you can 23 answer. 24 THE WITNESS: Some of the conversation 25 I don't recall.</p>

<p style="text-align: right;">Page 89</p> <p>1 BY MR. MURDOCK: 2 Q. I know. You've already said you don't 3 remember. 4 A. Right. 5 Q. But aside from not remembering the 6 conversations, do you have any reason to disagree 7 with anything else she says in that statement? 8 MR. BEMIS: Same objection. 9 THE WITNESS: That's hard to answer. 10 BY MR. MURDOCK: 11 Q. Tell me why it's hard to answer. 12 A. Because some of this conversation I don't 13 remember. 14 Q. I understand. And like I said, outside of 15 you stating you don't remember, do you have any 16 reason to disagree with what she said? 17 A. No. 18 Q. Thank you. 19 MR. MURDOCK: I'll pass the witness. 20 21 EXAMINATION 22 BY MR. SILVESTRI: 23 Q. I'm just going to follow up on this 24 statement, Mr. Sumera, since you've got it in front 25 of you.</p>	<p style="text-align: right;">Page 91</p> <p>1 A. Why? 2 Q. Yeah. 3 A. Because there might be a procedure going 4 on, for one thing. 5 Q. Okay. 6 A. They could be undressing -- the patient. 7 Those are some things. 8 Q. All right. Is it important for CNAs, as 9 well as RNs like yourself, to be somewhat modest with 10 their patients? 11 A. Yes. 12 Q. Be respectful, especially if you're a male 13 nurse or a male CNA and you're going into a female's 14 room? 15 A. Yes. 16 Q. And help me out. The ER at Centennial, at 17 the time that you had this conversation with 18 Ms. Wolfe, were there actual doors on the particular 19 rooms where a patient would be, or were they just 20 curtains? 21 A. Some has doors, some has curtains. 22 Q. So it was both? 23 A. Yeah. 24 Q. And would you expect a CNA to knock on a 25 patient's room that just had a curtain?</p>
<p style="text-align: right;">Page 90</p> <p>1 Correct me if I'm wrong, but I 2 believe you testified that Ms. Wolfe came to you and 3 asked you to speak to Mr. Farmer about how he dealt 4 with female patients generally, correct? 5 A. Yes. 6 Q. And more specifically, this is where I'm 7 not clear. 8 Did she ask you to address with 9 him how he dealt with female patients in attaching or 10 not attaching, affixing, whatever, adjusting heart 11 monitor leads? 12 A. What I recall as far as talking to Mr. 13 Farmer is make sure to knock before entering the room 14 of the patient. To ask the nurse whether the patient 15 needs the heart monitor on, or whether they need to 16 be in a gown. 17 So that's what I remember telling 18 him. 19 Q. So I want to just break it down. 20 The first thing she asked you to 21 address with him was to knock on the patient's door 22 before entering. 23 A. Yeah. 24 Q. Why would a CNA knock on a patient's door 25 before entering?</p>	<p style="text-align: right;">Page 92</p> <p>1 A. It's easy. Just knock on the side. 2 Q. But to knock nonetheless? 3 A. Knock, yeah. 4 Q. For the same purposes that you just cited? 5 A. Correct. 6 Q. And the second thing that she asked you to 7 instruct him was to ask the nurse -- I take it the 8 registered nurse -- if a patient needed a heart 9 monitor, before just going in and attaching one? 10 A. That's what I told Steve, yeah. 11 Q. That's what you told him? 12 A. Yeah. 13 Q. Did Ms. Wolfe ask you to tell him that? 14 A. If I recall -- I don't remember exactly, 15 but she told me to make sure that Steve knocks first. 16 Like I said, to knock first and ask the nurse first. 17 Q. And that was to ask the nurse first about 18 what? What was he supposed to ask the nurse about? 19 A. Whether the patient needs a heart monitor 20 and/or put a gown on. 21 Q. And/or put a gown on. Okay. 22 Was Ms. Wolfe's request of you 23 abnormal? Did that seem to fit the policy and 24 procedures of Centennial Hills Hospital, to your 25 knowledge?</p>

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1 A. I mean I get asked questions all the time.  
2 To me it's normal. Sometimes you forget to knock, so  
3 maybe at that time I reminded him to knock.  
4 Q. But to ask him to knock was not an abnormal  
5 request, was it?  
6 A. No.  
7 Q. That was something that you might ask any  
8 CNA to do, correct?  
9 A. Correct.  
10 Q. And to ask a CNA to check with the nurse  
11 first before a heart monitor lead needed to be  
12 attached or adjusted, that would be a normal request?  
13 A. Yes.  
14 Q. And to ask a CNA to go to the nurse first  
15 to find out if a patient needed to be gowned, that  
16 would be a normal request?  
17 A. Yes.  
18 Q. Were you uncomfortable in making those  
19 requests of Mr. Farmer?  
20 A. No. It's my job to instruct people.  
21 Q. And I might have missed this.  
22 Why do you think Ms. Wolfe came to  
23 you to ask Mr. Farmer -- or to instruct Mr. Farmer in  
24 such a way?  
25 A. Again, to respect the privacy of the

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1 patient.  
2 Q. Why didn't she, as opposed to coming to  
3 you --  
4 A. I don't know what her reason was at that  
5 time.  
6 Q. You weren't acting charge nurse that night?  
7 A. I don't know specifically if that night I  
8 was in charge or not.  
9 Q. And would this have been on an evening  
10 shift?  
11 A. It should be on the evening shift. That's  
12 what he worked.  
13 Q. Would you document that in an employment  
14 file, that you instructed a CNA on certain  
15 procedures? Would that be documented anywhere?  
16 A. As far as?  
17 Q. Would you have put it in his employment  
18 file or agency file?  
19 A. I don't think I have that capacity. I'm  
20 just a staff nurse to begin with, and a relief  
21 charge.  
22 Q. And you have to understand I don't know the  
23 policies and procedures at the hospital, so --  
24 A. I wouldn't really do anything as far as  
25 documenting performance.

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1 Q. Do you recall if you asked anybody superior  
2 to yourself to document what you had done that day?  
3 A. No.  
4 Q. Would you normally do that?  
5 A. As far as?  
6 Q. Would you go to your charge nurse or your  
7 superior and say, "I instructed or trained Mr. Farmer  
8 in these procedures today?  
9 A. No, I wouldn't.  
10 Q. Okay. And I'm looking to find out if there  
11 would be anything in writing that maybe you could  
12 look at that would refresh your recollection.  
13 Do you think there would be?  
14 A. No.  
15 Q. Okay. Now, dealing with the heart monitor,  
16 you were asked some questions about a 12-lead EKG and  
17 I believe a 3-lead heart monitor.  
18 A. Okay. I'm getting confused. In the ER  
19 there are 5 leads. In the recovery room where I work  
20 now, there are 3 leads.  
21 Q. Okay. For the heart monitors?  
22 A. Exactly, for the heart monitors.  
23 Q. Okay. Do you know what type of heart  
24 monitor, whether it's a 3-lead or 5-lead, would be  
25 used on one of the floors where patients -- if they

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1 needed it, where patients are eventually taken from  
2 the ER?  
3 MR. BEMIS: Objection. Foundation.  
4 THE WITNESS: The only hardwired  
5 monitor will be in the ICU, and everybody else that  
6 needs a telemetry monitor will be on a wireless  
7 telemetry box.  
8 BY MR. SILVESTRI:  
9 Q. You'll have to help me out. Let me just  
10 break it down.  
11 Where was the ICU back in 2008?  
12 A. 5th floor.  
13 Q. 5th floor. And in the ICU, what would be  
14 present there? A what?  
15 A. The heart monitor.  
16 Q. And you mentioned something about a  
17 hardwired heart monitor. What does that mean?  
18 A. That means the monitor is attached to a  
19 wall.  
20 Q. And the leads come out of the wall, or out  
21 of the monitor?  
22 A. The leads come out of the wall and into the  
23 chest leads on a patient.  
24 Q. And in that 5th floor ICU unit, do you know  
25 if it was a 5-lead or a 3-lead?

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1 A. It would be a 5-lead.  
2 Q. And you told us that the 3-lead placement  
3 would be in the left clavicle area, the right  
4 clavicle area, and then the left --  
5 A. The left lateral.  
6 Q. -- the left lateral area?  
7 A. Yeah.  
8 Q. And you're pointing -- and I know part of  
9 it is on video, but you pointed underneath the armpit  
10 underpart down about 6 inches?  
11 A. Yeah.  
12 Q. Where would the other two leads go, if it's  
13 a 5-lead?  
14 A. If it's a 5-lead the other one would go in  
15 the middle of the chest, and the fifth th one would  
16 go on the right lateral.  
17 Q. So you would have two up by the clavicle,  
18 one in the middle of the chest, and then two on the  
19 lateral side of the ribs down below the armpit?  
20 A. Correct.  
21 Q. And then you started to say if not in the  
22 ICU, there would be a wireless. Help me out and tell  
23 me what that is.  
24 A. The wireless would be for patients  
25 requiring heart monitoring who are being admitted to

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1 the hospital, and they can go anywhere on the floor  
2 and they can still be monitored.  
3 Q. So help me out. Just describe what it  
4 looks like. Are the leads in the same spots?  
5 A. The same spots, correct.  
6 Q. And the wireless, would it be a 3-lead or a  
7 5-lead?  
8 A. The wireless itself would require 5 leads.  
9 Q. And then those leads go to a little box?  
10 A. A little box.  
11 Q. That is either attached to the patient or  
12 at the patient's side?  
13 A. Yeah, correct.  
14 Q. Even if they're in bed?  
15 A. Typically they would be placed in a gown  
16 with a pocket.  
17 Q. I've seen those. Okay.  
18 Now, let me ask you, I don't mean  
19 to -- I'm going to get a little personal here -- not  
20 personal to you, but have you attached either 3 or  
21 5-lead heart monitors to female patients?  
22 A. Yes.  
23 Q. And in doing that, do you fondle their  
24 breasts as you do that?  
25 A. No.

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1 Q. Do you fondle their nipples as you do that?  
2 A. No.  
3 Q. Can you imagine any situation where you, as  
4 a registered nurse, would have to do that in  
5 attaching these leads or adjusting these leads?  
6 A. No.  
7 Q. And let's just take it to the 12-lead EKG  
8 monitors. Would you ever have to fondle a female  
9 patient's breast to attach or adjust those leads?  
10 A. It depends on the size of the woman's  
11 breast.  
12 Q. Would you ever have to pinch her nipple to  
13 do that?  
14 A. No.  
15 Q. Now, let me ask you some questions about  
16 the 12-lead EKG. Back in 2008 were 12-lead EKGs used  
17 in the ER?  
18 A. Yes.  
19 Q. And you have attached those to female and  
20 male patients?  
21 A. Correct.  
22 Q. Do CNAs attach 12-lead --  
23 A. They are not --  
24 Q. Let me finish, so we're not talking over  
25 one another. I apologize.

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1 A. Sorry.  
2 Q. Did CNAs attach or adjust 12-lead EKGs to  
3 male or female patients?  
4 A. No.  
5 Q. That is something that's reserved to the  
6 RNs?  
7 A. RNs and techs.  
8 Q. And techs. Okay.  
9 And I think you testified  
10 earlier -- and if I say this wrong, correct me -- and  
11 I think we were talking about heart monitors, you  
12 said it was the RN's responsibility to check if the  
13 heart monitors were attached correctly.  
14 A. Yes.  
15 Q. Is that a correct statement?  
16 A. Correct.  
17 Q. Is that statement also true with respect to  
18 the attachment of a 12-lead EKG?  
19 A. Correct.  
20 Q. Is there any notification given to the  
21 staff at Centennial Hills back in 2008 of a heart  
22 monitor lead that becomes detached from the patient?  
23 MR. BEMIS: I object to form. Calls  
24 for speculation. Answer, if you know.  
25 THE WITNESS: Are we talking about the

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

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1 A. As far as the heart monitor, no.  
2 Q. How about as far as a 12-lead EKG monitor?  
3 MR. BEMIS: I object to form.  
4 THE WITNESS: That's a one-time event.  
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  
11 you're educating me, and I appreciate that.  
12 So if a patient needs a 12-lead  
13 EKG, is it typical that a tech brings that machine  
14 in?  
15 A. Yes.  
16 Q. Attaches 12 leads to the patient?  
17 A. Yes.  
18 Q. One of which might be under a breast?  
19 A. Yes.  
20 Q. How long does it take that test to be done?  
21 A. Timewise, between -- it depends. If  
22 there's movement, we have to wait until it's nice and  
23 clear.  
24 Q. Let's assume that all the leads get  
25 attached, there's no movement and the test is being

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1 conducted. How long?  
2 A. Two to three minutes.  
3 Q. And the tech is there when this is  
4 happening?  
5 A. Yes.  
6 Q. And then what does the tech do when a  
7 successful test is completed?  
8 A. They will unplug the wires, the 12 wires,  
9 and then show the hard copy form to the physician.  
10 Q. Do they detach the leads from the patient?  
11 A. Yes.  
12 Q. And then they move on and go to the next  
13 patient where they've been asked to do that?  
14 A. Correct.  
15 Q. So these techs sort of float around the  
16 hospital, depending on where they're asked to go do a  
17 12-lead EKG test?  
18 A. Correct.  
19 Q. So typically if a tech comes down into the  
20 ER because the physician has asked for a 12-lead EKG  
21 test, the tech would go do that, give the results to  
22 the doctor, and detach the patient, and you as the RN  
23 probably wouldn't be involved in that. Is that fair?  
24 A. I'd like to know the results.  
25 Q. Oh, you'd like to know the results. But as

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1 far as attaching and detaching the leads, are you  
2 involved in that?  
3 A. No.  
4 Q. Is the CNA involved in that?  
5 A. No.  
6 Q. Okay. I appreciate that. Thank you very  
7 much for explaining that to me.  
8 Does Centennial Hills Hospital  
9 have a Patient's Bill of Rights?  
10 A. Yes.  
11 Q. Or something akin to that?  
12 A. The patient has a lot of rights in our  
13 hospital.  
14 Q. Are they posted?  
15 A. Are they posted?  
16 Q. I've seen hospitals where they have the  
17 Patient's Bill of Rights. That's a term that I've  
18 seen used.  
19 A. I don't think they're posted.  
20 Q. Have you seen them?  
21 A. In my readings.  
22 Q. In the ER, you've testified -- correct me  
23 if I'm wrong, and I'm going to give you what I think  
24 was close to a quote -- CNAs are always directed by  
25 the charge nurse or the registered nurse assigned to

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1 the patient's room, as to the tasks they're supposed  
2 to perform.  
3 A. Yes.  
4 Q. Is that an accurate statement?  
5 A. Yes.  
6 Q. Do CNAs record their activities or findings  
7 in any of the charts?  
8 MR. BEMIS: I object to form.  
9 BY MR. SILVESTRI:  
10 Q. If they go in to see a patient because  
11 they've been instructed to do that, do the CNAs chart  
12 that?  
13 A. At that time, no.  
14 Q. And when you say "at that time," what's  
15 "that time?"  
16 A. We weren't computerized then.  
17 Q. So in 2008? Is that what you're talking  
18 about?  
19 A. Correct, yeah.  
20 Q. So would they have handwritten anything in  
21 a chart?  
22 A. Handwritten on a piece of paper and given  
23 to the nurse.  
24 Q. And what would the nurse do with that?  
25 A. And put it in her chart.



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1 Q. So if a CNA did a task, the CNA would  
2 record that on a piece of paper. A big piece of  
3 paper, a little piece of paper?  
4 A. Scratch paper.  
5 Q. Scratch paper. And then would hand that to  
6 somebody like yourself, the nurse, and what would you  
7 do with it?  
8 A. It depends on what he's recording. If it's  
9 vital signs, I would put the vital signs in the  
10 chart.  
11 Q. And what do you mean by "vital signs?"  
12 A. The blood pressure, pulse, respiration, and  
13 temperature.  
14 Q. Okay. Are you trained to catheterize a  
15 patient?  
16 A. Yes.  
17 Q. And I'm talking about specifically for  
18 urine discharge. I want to talk about that kind of a  
19 catheter. Is that what you're talking about?  
20 A. A urine discharge? What do you mean by  
21 that?  
22 Q. Catheterize a patient so that they can  
23 discharge urine.  
24 A. Oh, yeah, to empty a bladder.  
25 Q. Yeah, empty their bladder. Urine comes

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1 from the bladder, right?  
2 A. Yeah.  
3 Q. And you're talking to a lawyer here, I'm  
4 not a doctor, so help me out.  
5 Do you do that to patients  
6 sometimes?  
7 A. Only if ordered by a doctor.  
8 Q. And if you are ordered by a doctor that  
9 Patient Silvestri needs to have a catheter -- by the  
10 way, does a bladder catheter sometimes have a  
11 specific name? Sometimes I see the name Foley  
12 catheter.  
13 A. Foley catheter is a popular name.  
14 Q. And if you are ordered by a doctor to do  
15 that, do you do it or do you assign it to somebody  
16 else?  
17 A. If it's a male, I will go ahead and do it,  
18 if it's my patient.  
19 Q. What if it's a female?  
20 A. I ask another female nurse.  
21 Q. Is that standard, to your knowledge, in the  
22 ER practice, of a female catheterizing a female  
23 patient? Was that the standard practice in 2008 at  
24 Centennial Hills emergency room?  
25 A. It's my standard, for patient privacy and

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1 for my protection also.  
2 Q. Okay. What I want to know is -- I  
3 understand that that's Mr. Sumera's practice.  
4 Did you see that as the general  
5 practice of your co-workers at Centennial Hills  
6 Hospital in 2008?  
7 MR. BEMIS: Calls for speculation.  
8 THE WITNESS: I don't really know  
9 what's going on in the room at that time. The ER is  
10 very busy.  
11 BY MR. SILVESTRI:  
12 Q. Understood. Have you ever discussed this  
13 issue with any of your co-workers?  
14 A. No. Only if I need their help to do a  
15 catheter on a female.  
16 Q. If the nurse needs help you will assist  
17 with a female patient?  
18 A. Yes.  
19 Q. Where you've been told by a doctor to  
20 catheterize or have a female patient catheterized,  
21 have you ever instructed a CNA to do that?  
22 A. That's not their job, so the answer is no.  
23 Q. Thank you. And I prefaced that with  
24 respect to a female patient.  
25 Is that true with respect male

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1 patients? In other words, would you ask a CNA to  
2 catheterize a male patient?  
3 A. A CNA cannot catheterize a patient.  
4 Q. Any patient?  
5 A. Any patient.  
6 Q. Are CNAs asked to -- you know, the catheter  
7 comes out of the person's body, and usually the urine  
8 drains into some kind of a vessel. Sometimes it's at  
9 the end of the bed, or wherever it might be located.  
10 Is a CNA charged with disposing of  
11 that urine that's collected in the vessel?  
12 A. When instructed by the nurse, yes.  
13 Q. Are you supposed to measure the output of  
14 the patient?  
15 A. Yes.  
16 Q. Why do you do that?  
17 MR. BEMIS: I object to form.  
18 Incomplete hypothetical.  
19 THE WITNESS: It depends.  
20 BY MR. SILVESTRI:  
21 Q. Give me some examples of why you measure  
22 output. I've seen that with family members in the  
23 hospital. They're always asking how much pee did  
24 they have.  
25 A. There's so many reasons. For example, if

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1 you're giving a patient a diuretic, meaning a  
2 medication to make them urinate, and the patient has  
3 a catheter, you need to measure and make sure the  
4 medication is working properly and there is urine  
5 output.  
6 Q. Regardless of the reason, is it proper to  
7 always record the urine output?  
8 A. Are we talking about at the ER or upstairs?  
9 Q. Well, let's deal with the ER.  
10 A. You have to record the urine output,  
11 correct.  
12 Q. And is that true if they're catheterized or  
13 not? Do you ask them, "Did you go to the bathroom?"  
14 A. What was the question again?  
15 Q. You try to record that information, urine  
16 output, if they're catheterized or not, right?  
17 A. (Witness nods.)  
18 Q. Is that correct?  
19 A. Yes.  
20 Q. I mean you ask a patient who is not  
21 catheterized, "Have you used the bathroom," right?  
22 A. Yes.  
23 Q. To your knowledge, is that true for a  
24 patient who has been placed in a room upstairs? Do  
25 they measure urine output?

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1 MR. BEMIS: I object to form.  
2 MR. MURDOCK: Objection. Speculation.  
3 THE WITNESS: Usually, to my  
4 understanding, every shift, at the end of the shift  
5 you try to get an intake and output of a patient.  
6 BY MR. SILVESTRI:  
7 Q. In fact there's a form that says, "Liquid  
8 intake, urine output," right?  
9 A. Yes.  
10 Q. Something along those lines?  
11 A. Yes.  
12 Q. Is that also true for bowel movements, that  
13 you want to record whether a patient has had a bowel  
14 movement? And let's start with the emergency room.  
15 A. Bowel movements, yes, as far as I do that.  
16 Q. Well, do you believe that that's common  
17 practice amongst your trade with registered nurses?  
18 A. I do that. I'm not sure what the other  
19 nurses do.  
20 Q. Have you received any instruction from  
21 Centennial Hills Hospital regarding the recording of  
22 whether a patient has a bowel movement?  
23 A. I do it as a practice.  
24 Q. My question was, have you received any  
25 training from Centennial Hills Hospital to record

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1 whether a patient in the emergency room has a bowel  
2 movement or not?  
3 A. It's part of their charting, yes.  
4 Q. Do you know if that's true also once a  
5 patient is transferred to a room upstairs?  
6 A. Yes.  
7 Q. In fact, there's a form that indicates  
8 whether a patient has had a bowel movement, correct?  
9 A. Yes.  
10 Q. And I'll be happy to show it to you, if you  
11 want.  
12 A. I believe you.  
13 Q. Who records that in the chart?  
14 A. The nurse will chart it.  
15 Q. Okay. And let me ask this.  
16 If a CNA is instructed by the  
17 nurse to empty the vessel that holds the urine from a  
18 catheter, that CNA will do that, and then provide you  
19 with the amount of urine that was in the vessel?  
20 A. Yes.  
21 Q. And then you will chart it?  
22 A. Correct.  
23 Q. And likewise, if a patient soils him or  
24 herself with a bowel movement, would you ask the CNA  
25 to clean that up?

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1 A. I would ask the CNA to help me clean it up.  
2 Q. What does that mean when you say "help me?"  
3 It might sound obvious, but tell me what it means  
4 when you say you ask the CNA to help you clean it up.  
5 A. In the ER we work as a team, and usually  
6 somebody that dirtied their gurney -- it takes two  
7 the people to take care of that.  
8 Q. Why?  
9 A. Because we have to turn the patient from  
10 side to side without hurting our backs.  
11 Q. Would that same concern be seen in a room  
12 upstairs?  
13 MR. BEMIS: I object to form. Go ahead  
14 and answer, if you can.  
15 THE WITNESS: Yes. If they're smart.  
16 You've got to protect your backs.  
17 BY MR. SILVESTRI:  
18 Q. What about protecting the patient?  
19 A. Yes, so the patient won't fall down.  
20 Q. And let me ask you this. Are there modesty  
21 concerns?  
22 For example, if you had a female  
23 patient that had soiled herself with a bowel  
24 movement -- we talked about the catheterization.  
25 Would that be something where you might ask a female

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1 nurse to assist?  
2 A. Yes.  
3 Q. Would you ever go in with two male nurses  
4 or a male nurse and a male CNA to clean up a female  
5 patient who had soiled herself?  
6 A. The question is, is there another female I  
7 can find? Or is that the last choice?  
8 Q. Let's deal with the first example, there's  
9 another female.  
10 A. I would ask the female first.  
11 Q. And then otherwise, if there's only two  
12 males, you would go ahead and do it, because it's  
13 important to clean that patient up?  
14 A. Yes.  
15 Q. Would you record that?  
16 A. Yes.  
17 Q. In other words, it would be on the chart  
18 that the patient had a bowel movement?  
19 A. Yes.  
20 Q. Would you ever send a CNA in by himself to  
21 do that?  
22 A. To do what?  
23 Q. Clean up a bowel movement of a female  
24 patient.  
25 A. It's going to be hard. I would rather

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1 help. We need help. We help each other, so --  
2 Q. And I apologize for these questions. They  
3 might seem a little mundane to you, but just bear  
4 with me.  
5 In cleaning up a male or female  
6 patient that's had a bowel movement -- typically is  
7 it fair to say that the bed has a pad on it?  
8 A. Yes.  
9 Q. Is that true in the ER?  
10 A. No.  
11 Q. It's not?  
12 A. Not all the time.  
13 Q. Okay. You've seen though other beds in the  
14 hospital where they have a pad that is sort of --  
15 almost like a big diaper, right?  
16 A. Yes.  
17 Q. It's water-resistant on one side, and a  
18 little bit softer on the other side?  
19 A. Yes.  
20 Q. And so in cleaning up a patient that has a  
21 bowel movement, tell me what's required.  
22 A. First of all, can the patient move or not?  
23 If it's a nursing home patient, they will have a hard  
24 time moving. So I need another person to help me  
25 turn the patient.

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1 Q. So if the patient can't move, then you  
2 definitely need two people to help turn the patient?  
3 A. Yes.  
4 Q. Okay. Keep going.  
5 A. One staff member will help turn, while the  
6 other staff member will help take the bedpan out and  
7 wipe and clean, and maybe change the sheets, if  
8 necessary; and then we have to do it over again on  
9 the other side.  
10 Q. Now, you mentioned the bedpan. That's  
11 assuming the patient has asked you, "I have to go to  
12 the bathroom, can you bring me a bedpan," correct?  
13 A. Yes.  
14 Q. What about in the circumstances where a  
15 patient didn't give you the warning and soils him or  
16 herself in the bed? Tell me about that.  
17 MR. MURDOCK: Jim, I'm sorry, are we  
18 still talking about the ER?  
19 MR. SILVESTRI: No, now we're talking  
20 about in the bed with one of these pads.  
21 MR. MURDOCK: Okay.  
22 BY MR. SILVESTRI:  
23 Q. What would you do?  
24 MR. MURDOCK: Objection. Speculation.  
25 Go ahead.

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1 THE WITNESS: Again, I need another  
2 person to help me. The same thing, turning.  
3 BY MR. SILVESTRI:  
4 Q. And would you have to turn both sides?  
5 A. You have to adjust the bedpan.  
6 Q. No, there's no bedpan.  
7 A. Okay.  
8 Q. They soiled themselves and there's just  
9 that bed pad. Tell me what you do then.  
10 A. Turn the patient to one side, and the other  
11 staff member will help clean, replace the sheets, and  
12 put back another pad; and then will turn to the other  
13 side and straighten out the sheets.  
14 Q. And that takes two people?  
15 A. Yes.  
16 Q. And would that be charted?  
17 A. Bowel movements, yes.  
18 Q. And so in doing this you've got to bring in  
19 a new pad, correct?  
20 A. Yes.  
21 Q. Sometimes you've got to bring in new  
22 sheets?  
23 A. Yes. Sometimes a new gown.  
24 Q. Sometimes a new gown. And you have to  
25 bring in some wipes, correct?

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1 A. Yes.  
2 Q. Like baby wipes?  
3 A. Yes.  
4 Q. Would you glove up to do that?  
5 A. Absolutely.  
6 Q. Would there be any charting or recording  
7 anywhere that the patient has received new sheets or  
8 a new pad, or anything like that?  
9 A. I would chart that in my charting, that the  
10 patient is incontinent of stool.  
11 Q. Would a CNA ever chart that?  
12 A. They don't chart, as far as in the ER.  
13 Q. Do you know if CNAs chart upstairs?  
14 MR. BEMIS: I object to form.  
15 THE WITNESS: I don't know officially.  
16 BY MR. SILVESTRI:  
17 Q. In your practice as a registered nurse,  
18 have you ever instructed a CNA to do something that  
19 is not within Nevada Code?  
20 A. No.  
21 MR. MURDOCK: Objection. Assumes facts  
22 not in evidence, and lacks foundation.  
23 BY MR. SILVESTRI:  
24 Q. You said that one of the things that a CNA  
25 can do is stock the room with supplies.

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1 A. Yes.  
2 Q. If a CNA is going to stock a room with  
3 supplies, would you expect the CNA to still knock  
4 before entering?  
5 A. Yes.  
6 Q. Because of the reasons that we've stated  
7 before, modesty and privacy?  
8 A. Privacy and modesty.  
9 Q. Would you expect a CNA who is stocking a  
10 room and who sees that a patient has soiled him or  
11 herself, to take care of that problem before  
12 reporting it to the nurse?  
13 MR. BEMIS: I object to form.  
14 Speculation.  
15 MR. MURDOCK: Objection. Are we  
16 talking about in the ER or --  
17 MR. SILVESTRI: Anywhere.  
18 MR. MURDOCK: Oh, okay. Speculation.  
19 THE WITNESS: Again, they'll need help.  
20 We work as a team.  
21 BY MR. SILVESTRI:  
22 Q. So they would have to come and report to  
23 you?  
24 A. Yeah.  
25 Q. Does Centennial Hills, at least since the

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1 time you've been there -- have you always been  
2 instructed that patient safety is a priority?  
3 A. Number 1, yes.  
4 Q. Do you know if agency nurses or agency CNAs  
5 are instructed by Centennial Hills Hospital that  
6 patient safety is the number 1 priority?  
7 MR. BEMIS: Lack of foundation. Calls  
8 for speculation. Answer, if you know.  
9 THE WITNESS: I hope they would, yeah.  
10 BY MR. SILVESTRI:  
11 Q. Perhaps it would be better if I asked  
12 somebody else from Centennial Hills that question,  
13 who is more in charge, like a supervisor or  
14 something?  
15 A. Correct.  
16 Q. Okay. Do you know what the 2005 Patient  
17 Safety Goals are?  
18 A. I don't remember.  
19 Q. I mean is it a document? Have you heard of  
20 that before?  
21 A. I want to say Core Measure. It's always  
22 about patient safety.  
23 Q. What's Core Measure?  
24 A. It's something that we are striving to do a  
25 hundred percent of. One of the Core Measures are

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1 preventing pneumonia, so we have to ask patients  
2 whether they've had pneumonia vaccines or not, during  
3 that season.  
4 THE WITNESS: Excuse me, I think I need  
5 a break, because I need to put more money on my  
6 parking.  
7 MR. SILVESTRI: I have like one more  
8 question. I'm happy to break now. I don't want you  
9 to get a ticket.  
10 THE WITNESS: Go ahead.  
11 BY MR. SILVESTRI:  
12 Q. Do you have the statement in front of you,  
13 Exhibit 1?  
14 A. Yeah.  
15 Q. Page 8. You were asked questions about  
16 specific conversations, and whether you recalled them  
17 or not. Let me ask this question a little bit  
18 differently.  
19 Was it your impression that  
20 Mr. Farmer was overly attentive to female patients?  
21 A. No. I never got that impression during  
22 that time.  
23 Q. Okay. The fact that Ms. Wolfe asked you to  
24 talk to him -- did you look at her like she was  
25 crazy?

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1 A. No. I took that as giving some privacy to  
2 the patients. Sometimes we have to remind our staff  
3 that privacy is important. Even nurses we have to  
4 remind.  
5 Q. Do you recall ever reporting to any of your  
6 superiors at Centennial Hills that Mr. Farmer was  
7 doing something inappropriate or was overly attentive  
8 to female patients?  
9 A. No.  
10 Q. This part of the statement says in part,  
11 "He was very overly attentive with female patients  
12 and very anxious to connect them to monitors and  
13 disconnect them from the monitors."  
14 I want to make sure I understand.  
15 If we're talking about a heart monitor, would you  
16 have asked a CNA to attach a heart monitor to a  
17 female patient?  
18 A. Why is the patient there, first of all?  
19 Does the patient require a heart monitor or not?  
20 Q. Let's assume that they do.  
21 A. I would just probably put that on myself.  
22 Q. Had you seen CNAs attach heart monitors to  
23 female patients in the emergency room before?  
24 A. Sometimes we do. If we need that patient  
25 really fast, they will help us.

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1 Q. Well, when you say "help us," does that  
2 mean somebody else is present?  
3 A. Yes, as far as a staff nurse, CNA, tech.  
4 Q. Would they ever do it alone with the door  
5 closed?  
6 A. No.  
7 Q. Would they be allowed to do it alone with  
8 the door closed?  
9 A. Probably not.  
10 Q. Would they be allowed to do it alone with  
11 the curtains closed?  
12 A. Probably not.  
13 Q. And would a CNA be allowed to attach a  
14 heart monitor without receiving instruction to do so  
15 from the charge nurse or an RN?  
16 A. They're not allowed.  
17 Q. They can't take that into their own hands  
18 and say, "Hey, I'm going to attach a heart monitor to  
19 you?"  
20 A. Again, that's needlessly doing something  
21 that's not needed, so --  
22 Q. Even if it was needed, if they weren't  
23 instructed to do it, is a CNA authorized to do that  
24 at Centennial Hills Hospital?  
25 A. No.

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1 Q. Was that the same for 2008?  
2 A. No, they're not allowed.  
3 Q. They were not allowed to do that in 2008,  
4 is that correct?  
5 A. They can help the nurse, again, with  
6 instruction.  
7 Q. That's not my question. I'm just being  
8 very particular here.  
9 In 2008 were CNAs allowed to,  
10 under their own supervision and at their own  
11 direction, attach a heart monitor to a patient?  
12 A. No.  
13 Q. Male or female, correct?  
14 A. Correct.  
15 MR. SILVESTRI: Mr. Sumera, I  
16 appreciate your answers. Thank you.  
17 MS. HUETH: I don't have any questions.  
18 (Recess.)  
19  
20 FURTHER EXAMINATION  
21 BY MR. MURDOCK:  
22 Q. Mr. Sumera, I'm a little confused about  
23 something. Were you the charge nurse on May 15th?  
24 A. I don't know whether I was in charge or  
25 not -- on what specific day. I don't know.

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1 Q. And just so I'm clear, Ms. Wolfe came to  
2 you and told you that Mr. Farmer had been putting  
3 heart monitor leads on all the female patients,  
4 right?  
5 MR. BEMIS: I object to form.  
6 Misstates testimony.  
7 THE WITNESS: I don't remember her  
8 saying that to me.  
9 BY MR. MURDOCK:  
10 Q. Okay. So what did she say to you?  
11 A. The exact conversation I don't remember,  
12 but I believe it's just to respect the privacy of the  
13 patient. Again, to knock first.  
14 Q. Well, she said that Mr. Farmer was not  
15 respecting the privacy. Is that what she said?  
16 A. Again, I don't know what exactly Margaret  
17 Wolfe told me, but I did tell Mr. Farmer again to  
18 knock first, make sure to ask the nurse whether they  
19 need a heart monitor, to ask the nurse whether they  
20 need to be gowned up.  
21 Q. Now, you said that he needed to ask the  
22 nurse if the patient needed a heart monitor, right?  
23 A. Correct.  
24 Q. Well, why would he have to ask the nurse if  
25 -- well, did CNAs put the heart monitors on?

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

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1 deposition today under oath and stating, "No, that  
2 conversation absolutely did not occur," correct?  
3 You're just saying, "I don't recall it?"  
4 A. I don't recall it.  
5 Q. Okay. Now, you stated, regarding one of  
6 Mr. Silvestri's questions, that you never got the  
7 impression that Steven was overly attentive to  
8 females, right?  
9 A. You're asking my perception, correct?  
10 Q. Well, I just remember what you answered to  
11 Mr. Silvestri.  
12 Mr. Silvestri asked you whether or  
13 not you got the impression that Steven was overly  
14 attentive, and you said, "No, I never got that  
15 impression."  
16 Are you talking about today as you  
17 sit here, or could there be a different answer back  
18 in 2008, you just don't remember?  
19 A. In 2008, no, I have no perception as far as  
20 suspicion or anything.  
21 Q. You just don't remember, or that did not  
22 occur?  
23 A. What did not occur?  
24 Q. That you had an impression that he was  
25 overly attentive.

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1 A. No, it's not my impression that that  
2 happened.  
3 Q. So it never happened, right?  
4 A. Which never happened?  
5 Q. That you believe that he was overly  
6 attentive. That did not occur?  
7 A. I don't remember him being too attentive,  
8 as far as --  
9 Q. But that's as you sit here today.  
10 A. Uh-huh.  
11 Q. But you remember, we just had a discussion  
12 about a conversation you might have had with  
13 Ms. Wolfe, and you discussed his being overly  
14 attentive, and that would have been before May 14,  
15 2008, and you said, "I don't remember."  
16 You do recall that, right?  
17 A. What I remember is Margaret told me to  
18 speak to Steve Farmer.  
19 Q. I know. I'm talking about before May 14,  
20 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?

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1 A. I don't remember any conversation like  
2 that.  
3 Q. Okay. So it didn't happen. It didn't  
4 happen, or you just don't remember it? There's a  
5 difference. You understand that, right?  
6 A. I don't recall, again, the conversation.  
7 Q. So it's possible you did have the  
8 conversation?  
9 A. It's possible, or it never happened.  
10 Again, I don't recall.  
11 Q. Well, those are two completely different  
12 things. Do you understand why?  
13 A. Yes.  
14 Q. Okay. So it's possible that you had the  
15 conversation, you just don't remember it, correct?  
16 A. Correct.  
17 Q. And it's possible you told 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?  
21 MR. BEMIS: I object to form.  
22 THE WITNESS: I don't remember the  
23 conversation.  
24 BY MR. MURDOCK:  
25 Q. But it's possible it did occur, correct?

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1 A. I don't think so.  
2 Q. You don't think so. So I guess Ms. Wolfe  
3 is lying, and lied to the police, is that correct?  
4 A. I don't know why she would say things. I  
5 don't know.  
6 Q. Well, did she lie?  
7 A. I couldn't answer for her.  
8 Q. Well, before Mr. Silvestri asked you  
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 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. He  
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?

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



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1 Q. -- to make sure that the charge nurses are  
2 doing their job, right?  
3 A. Correct.  
4 Q. Okay. Does the agency manager -- the staff  
5 agency manager come into play there at all?  
6 MR. BEMIS: I object to form. Calls  
7 for speculation.  
8 BY MR. MURDOCK:  
9 Q. In the hierarchy?  
10 A. I don't know.  
11 Q. Well, you've been a charge nurse -- at  
12 least you're a charge relief nurse from time to time,  
13 right?  
14 A. Yes.  
15 Q. Have you ever had an agency manager come in  
16 and tell the CNA what to do during your shift?  
17 A. No, I've never seen that.  
18 Q. Would you ever call the agency manager to  
19 ask them if a CNA could do something on your shift?  
20 A. No, I would not.  
21 Q. Okay. Outside of this case -- you said you  
22 looked on Yahoo news, and I assume you're computer  
23 savvy?  
24 A. Cellphone.  
25 Q. Had you ever heard of a CNA sexually

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1 abusing or assaulting a patient? Had you ever heard  
2 of that anywhere at all?  
3 A. No.  
4 Q. Did you ever hear of it at any other  
5 hospitals in Las Vegas?  
6 A. No.  
7 Q. Had you ever been told that you are not  
8 allowed to sexually assault a patient?  
9 A. We're not allowed to do harm to any  
10 patient.  
11 Q. Okay. Are you allowed to touch a patient  
12 in a way -- for instance, are you allowed to touch a  
13 female patient's nipples?  
14 A. No. Absolutely not.  
15 Q. Okay. Are you allowed to touch a female  
16 patient's vagina?  
17 MR. BEMIS: I object to form.  
18 Incomplete hypothetical.  
19 THE WITNESS: For what purpose?  
20 BY MR. MURDOCK:  
21 Q. Any purpose whatsoever.  
22 A. You have to have a reason. No, there's no  
23 reason for me to touch a vagina, as far as work.  
24 Q. What about medically?  
25 A. If we have to insert a Foley, then at that

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1 time, yeah.  
2 Q. Sure. Is there a reason -- I guess when  
3 you're cleaning someone's anus if they've had a bowel  
4 movement, you certainly can wipe the anus, is that  
5 correct?  
6 A. Correct.  
7 Q. Have you ever seen a policy and/or  
8 procedure -- a written policy or procedure from  
9 Centennial Hills Hospital that details how to clean a  
10 patient who has just had a bowel movement and needs  
11 help cleaning?  
12 A. I've never looked for it, so I don't know  
13 if it exists.  
14 Q. Have you ever been told that it existed?  
15 A. No.  
16 Q. Have you ever seen a policy and procedure  
17 from Centennial Hills Hospital as to how to put heart  
18 leads on a female patient?  
19 A. They're the same, male and female.  
20 Q. Okay. Have you ever seen a written policy  
21 and procedure as to how to do that?  
22 A. I've never looked for it, so I don't know.  
23 Q. Because that's something you just know  
24 because you're an RN, right?  
25 A. Correct.

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1 Q. Now, do you remember reading Plaintiff's  
2 Exhibit 1 in full?  
3 A. Yes, today.  
4 Q. Outside of things that you just don't  
5 remember -- that are possible that happened, but you  
6 just don't remember them -- do you dispute anything  
7 that's in this statement?  
8 MR. BEMIS: I object to form. Asked  
9 and answered.  
10 THE WITNESS: I don't know how to  
11 answer that.  
12 BY MR. MURDOCK:  
13 Q. And again, listen to my question.  
14 Outside of things that you may not  
15 remember, or you may not recall -- they're possible,  
16 you just don't recall them -- outside of that, do you  
17 dispute anything in Plaintiff's Exhibit 1?  
18 MR. BEMIS: Same objection.  
19 BY MR. MURDOCK:  
20 Q. In other words, let me put it this way.  
21 Can you point to anything in  
22 Plaintiff's Exhibit 1 and say, "Absolutely not, this  
23 did not occur?"  
24 A. As far as the conversations?  
25 Q. No. Anything in Plaintiff's Exhibit 1.

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1 Can you show me in Plaintiff's  
2 Exhibit 1 anything -- anything at all where you state  
3 to yourself, "No, this did not occur?"  
4 A. Just it might have happened? It's  
5 possible?  
6 Q. If it's possible, yeah.  
7 A. Possible.  
8 Q. Okay. Let me ask the question again.  
9 Can you state anything in  
10 Plaintiff's Exhibit 1, anything at all, that  
11 absolutely did not happen?  
12 MR. BEMIS: Asked and answered.  
13 THE WITNESS: As far as the  
14 conversations or --  
15 BY MR. MURDOCK:  
16 Q. As far as anything in Plaintiff's Exhibit  
17 1. Everything that Ms. Wolfe stated to the cops.  
18 Everything.  
19 Can you state absolutely, "This  
20 did not happen." Something in this document. Is  
21 there anything in here where you state to yourself,  
22 "Absolutely this did not happen?"  
23 A. As far as?  
24 Q. Is there anything in this statement that  
25 you can tell us today, "No, Mr. Murdock, I can show

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1 you right here in this statement, this did not  
2 occur."  
3 Is there anything in this  
4 statement, in full, that did not occur?  
5 A. I cannot for certain answer that question.  
6 It could be possible. I don't know.  
7 Q. I understand it could be possible.  
8 What I'm asking you is, is there  
9 anything in Plaintiff's Exhibit 1 that you dispute in  
10 total? In other words, that you say, "No, it did not  
11 occur." Anything at all. Anything in this  
12 statement.  
13 A. No.  
14 MR. MURDOCK: Thank you. I have no  
15 further questions.  
16 MR. SILVESTRI: I have just a couple  
17 follow-ups.  
18  
19 FURTHER EXAMINATION  
20 BY MR. SILVESTRI:  
21 Q. Mr. Sumera, if a patient has or gets an EKG  
22 test done, how is that typically documented in the  
23 chart? Does it just say EKG, or ECG?  
24 A. Probably it can go either ECG or EKG.  
25 Q. If a patient has a heart monitor applied to

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1 him or her, how is that identified in the charts at  
2 Centennial Hills Hospital?  
3 A. "Heart monitor."  
4 Q. There's no like acronym or --  
5 A. No.  
6 Q. I want to just show you three pages. I  
7 want to show you Exhibit 2 for identification  
8 purposes. For whatever reason the Bates stamp didn't  
9 print, so my computer must be doing something funny.  
10 At the top it says, "Caliper Measurements," and the  
11 date is May 15, 2008 at 20:59:58.  
12 Can you just take a look at that  
13 document and just tell me what that document is  
14 measuring or showing?  
15 MR. BEMIS: I object to form. Calls  
16 for speculation.  
17 MR. MURDOCK: I actually agree with  
18 John.  
19 THE WITNESS: It's just a rhythm. It's  
20 not a 12-lead EKG.  
21 BY MR. SILVESTRI:  
22 Q. Is it a heart monitor?  
23 A. It's a heart monitor, yes.  
24 Q. Is it a moment in time or --  
25 A. Yeah. That picture, yes, is a moment in

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1 time.  
2 Q. So does that mean that the heart monitor is  
3 attached and then detached, or does it remain  
4 attached?  
5 A. At this point it's attached.  
6 Q. Would it typically remain attached to the  
7 patient?  
8 MR. MURDOCK: Objection. Speculation.  
9 MR. BEMIS: Calls for speculation.  
10 BY MR. SILVESTRI:  
11 Q. Well, let me just give you the background.  
12 You said that a tech might come in  
13 and do a 12-lead EKG.  
14 A. Right.  
15 Q. They would attach the 12 leads, do a  
16 measurement, which would take a minute or two, and  
17 then they would detach the leads and give the report  
18 to the doctor, or perhaps to the nurse?  
19 A. Correct.  
20 Q. Does the same process occur for the heart  
21 monitor, or does the heart monitor -- those three or  
22 four or five leads stay attached?  
23 A. First of all, are you saying this is a  
24 12-lead printout?  
25 Q. I have no idea what it is. I'm asking you.

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1 A. It's not a 12-lead printout.  
2 Q. Is it a heart monitor?  
3 A. It's just a regular heart rhythm printout.  
4 Q. From a 3 or 5-lead monitor?  
5 MR. BEMIS: I object to form. It calls  
6 for speculation.  
7 BY MR. SILVESTRI:  
8 Q. If you know.  
9 A. I don't know how many leads they're using.  
10 If it's a telemetry box, they will use 5 leads. If  
11 it's the wireless telemetry boxes, it will be 5  
12 leads.  
13 Q. I just need to know -- these are records  
14 from Centennial Hills. All I want to know is, do you  
15 know what that Exhibit 2 is depicting?  
16 A. Normal sinus rhythm.  
17 Q. From what instrument? A heart monitor?  
18 A. My eyeball.  
19 Q. Somehow that document got printed,  
20 recording some type of results from this patient.  
21 What I want to know is, did those  
22 results come from a 3 or 5-lead heart monitor?  
23 MR. BEMIS: Form. Calls for  
24 speculation.  
25 THE WITNESS: Where did this come from?

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1 BY MR. SILVESTRI:  
2 Q. Yes, correct. Where did number 2 come  
3 from?  
4 A. I mean where did this printout come from?  
5 Q. Yeah. Do you know where the information on  
6 Exhibit 2 came from?  
7 A. No.  
8 Q. Did it come from a heart monitor?  
9 A. It looks like a heart rhythm.  
10 Q. Does a heart rhythm come from a heart  
11 monitor?  
12 A. If this is coming from a patient, it's  
13 being recorded in a telemetry room watched by  
14 technicians.  
15 Q. Okay.  
16 A. And from that room they can print out  
17 anybody's heart rhythm on a piece of paper.  
18 Q. As a result of a heart monitor being  
19 attached to that patient, is that correct?  
20 A. The only way you would get a rhythm is if  
21 the monitor is attached.  
22 Q. Okay. It's not from a stethoscope.  
23 A. No.  
24 Q. So what's in front of you is information  
25 that's ultimately taken from a heart monitor piece of

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1 equipment being attached to a patient, correct?  
2 A. Correct.  
3 Q. Now, are you able to tell me from that  
4 document whether it was a 3-lead or a 5-lead heart  
5 monitor? If you can tell.  
6 A. I can't tell.  
7 Q. You can't tell.  
8 MR. MURDOCK: Are you attaching it,  
9 Jim?  
10 MR. SILVESTRI: Yeah, I'll attach it.  
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  
13 attach it.  
14 (Plaintiff's Exhibits 2 & 3 marked.)  
15 BY MR. SILVESTRI:  
16 Q. I want you to take a look at Exhibit 3.  
17 Can you take a look at Exhibit 3,  
18 Mr. Sumera, and tell me what Exhibit 3 is recording,  
19 if you know? This also I'll just represent is a  
20 record from Centennial Hills Hospital.  
21 MR. BEMIS: I object to form. Calls  
22 for speculation. You can answer.  
23 THE WITNESS: This looks like a 12-lead  
24 EKG reading.  
25

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1 BY MR. SILVESTRI:  
2 Q. Okay. And for the record, can you just  
3 look at that record and tell me, for example, what  
4 the date is, and the time?  
5 A. The date is May 15, 2008. Military time  
6 converted to our time is 4:56 p.m.  
7 Q. Okay.  
8 (Plaintiff's Exhibit 4 marked.)  
9 BY MR. SILVESTRI:  
10 Q. And if you would look at Exhibit 4 and just  
11 tell me if you know what Exhibit 4 is. This is  
12 helping me so I know what I'm looking at.  
13 Can you tell me what Exhibit 4 is  
14 measuring?  
15 MR. BEMIS: Same objection. Calls for  
16 speculation.  
17 BY MR. SILVESTRI:  
18 Q. Which also I'll purport to you is a record  
19 from Centennial Hills Hospital.  
20 A. It looks like a 12-lead EKG printout.  
21 Q. Okay. Is it your understanding that heart  
22 monitors, whether they be 3-lead or 5-lead, typically  
23 remain attached to a patient until a doctor orders  
24 that it be detached?  
25 A. Yes.

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1 Q. So it's different from the 12-lead EKG?  
2 A. Yes.  
3 Q. Okay. And if a 3 or 5-lead heart monitor  
4 becomes detached, or malfunctions at any time, would  
5 it be recorded on a document like Exhibit 2 anywhere  
6 for a patient, or would it only be noted in the chart  
7 that the nurse writes in or types in?  
8 A. Which one is the Exhibit 2? The first one?  
9 Q. Well, it says "2" on it. Do you see my red  
10 "2" on the bottom right-hand corner?  
11 A. Yes.  
12 Q. You said that appeared to be taken from a  
13 heart monitor.  
14 A. Correct.  
15 Q. Either a 3 or a 5-lead heart monitor.  
16 What I want to know is, for the  
17 heart monitors, to your knowledge, if such became  
18 detached or malfunctioned in any way, would it be  
19 documented anywhere, other than in a nurse's notes in  
20 the chart?  
21 A. First of all, is this a wall monitor or is  
22 it the wireless telemetry box?  
23 Q. Let's start with the first one. Let's  
24 assume it's the telemetry box.  
25 A. So that's being read by techs. Again, they

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1 will call the specific floor where the patient is and  
2 they will let the nurse know it's detached.  
3 Q. Do you know when that telemetry personnel  
4 calls the nurse, if that instance is recorded on any  
5 piece of paper that looks akin to or like Exhibit 2?  
6 Or would it only be recorded by the nurse if the  
7 nurse puts it in the chart?  
8 MR. BEMIS: Calls for speculation.  
9 THE WITNESS: If the tech calls the  
10 nurse, the nurse would just go in there and fix it  
11 real quick. It's something easily done.  
12 BY MR. SILVESTRI:  
13 Q. Okay. Would that typically be put in the  
14 patient's chart?  
15 A. No.  
16 Q. And would it be recorded electronically  
17 anywhere that, "Jim Silvestri's heart monitor  
18 malfunctioned at 4:55 p.m.?"  
19 MR. MURDOCK: Objection. Speculation.  
20 BY MR. SILVESTRI:  
21 Q. Would it be recorded anywhere, to your  
22 knowledge?  
23 A. I don't know what the technician in the  
24 telemetry room does.  
25 Q. And you don't know what documents the

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1 telemetry room might save or keep in a file, or  
2 anything like that?  
3 A. Yeah. I don't know.  
4 MR. SILVESTRI: That's all I've got.  
5 Thanks.  
6 MR. MURDOCK: I think you can go.  
7 You have the right to make any  
8 changes to your answers. However, I caution you that  
9 I or any other counsel can comment on the fact that  
10 you made changes, and that may affect your  
11 credibility.  
12 Do you understand that?  
13 THE WITNESS: I understand.  
14 MR. MURDOCK: You can also waive that  
15 right to read the deposition. In other words, you  
16 can say to yourself, "Hey, I'm sure she took it down  
17 right."  
18 But it's up to you, whether you  
19 want to waive it or not. It's your call, but you've  
20 got to tell her.  
21 MR. BEMIS: We'll read and sign.  
22 MR. MURDOCK: Can you answer, please?  
23 THE WITNESS: We will read it.  
24 MR. MURDOCK: Thank you.  
25 (The deposition concluded at 12:43 p.m.)

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REPORTER'S CERTIFICATE

1  
2 STATE OF NEVADA )  
3 ) ss.  
4 COUNTY OF CLARK )  
5 I, Carol O'Malley, Nevada Certified Court  
6 Reporter 178, do hereby certify:  
7 That I reported the taking of the deposition  
8 of RENATO SUMERA, RN on May 1, 2015 commencing at the  
9 hour of 9:30 a.m.;  
10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole  
12 truth, and nothing but the truth;  
13 That I thereafter transcribed my said  
14 shorthand notes into typewriting and that the  
15 typewritten transcription of said deposition is a  
16 complete, true, and accurate transcription of my said  
17 shorthand notes taken down at said time. Review of  
18 the transcript was requested.  
19 I further certify that I am not a relative or  
20 employee of an attorney or counsel involved in said  
21 action, nor financially interested in said action.  
22 IN WITNESS WHEREOF, I have hereunto set my hand  
23 in my office in the County of Clark, State of Nevada,  
24 this 5th day of May, 2015.  
25 *Carol O'Malley*  
Carol O'Malley, CCR No. 478

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

TAB 55

9/23/2009  
04:20 PM

Universal Health Services  
RISK MANAGEMENT WORKSHEET  
CONFIDENTIAL INFORMATION

PAGE 1

For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

MRN: [REDACTED] Age: [REDACTED] DOB: [REDACTED] Sex: [REDACTED]

===== ENCOUNTER DATA =====

Start Date: 5/15/2008 Acct. No.: 8000118219  
Admit Phys: SHUJA, AMIR Attend Phys: SHUJA, AMIR  
Complaint: [REDACTED]  
End Date: 5/17/2008 Disch Dx: [REDACTED]

===== GENERAL EVENT DATA =====

Date Received: 5/16/2008 No: 08-22396 Info Source:  
Event Date: 5/16/2008 Time: 7:00A Shift:  
Loc: 7S-CH Room: 725 Facility: CENTENNIAL HILLS HOSPITAL MEDI  
Phys Notified: N Notified Phys:  
Type: SAF/SEC/PRIV - SEXUAL ASSAULT/RAPE ALLEGATION

Quantity: Significance: LEVEL III RISK

Attr Depts: Attr Empls: Attr Phys:

Outcomes: INJURY SUSTAINED-OTHER Parameters:

Treatment:

Summary Comment:

Status: CLOSED, TRACK AND TREND Entered by: WESCOTT, LORRAINE

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 around 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 had 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

AA2462

9/23/2009  
04:20 PM

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

PAGE 2

MRN: [REDACTED]

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 FLOOR. MS. WESCOTT INFORMED SECURITY THAT THE PATIENT A [REDACTED] 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 [REDACTED] WAS IN THE ROOM AND HAD CONTACTED THE METRO POLICE DEPARTMENT. I CONTACTED THE SECURITY SUPERVISOR LARRY KING 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 [REDACTED] 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 [REDACTED] WAS DISCHARGED

===== WITNESSES DATA =====

Physicians:

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

Other:

===== REFERRAL DATA =====

Ref. Date:

Resp. Expected:

Resp. Received:

Ref. from Emp.:

Ref. from Dept.:

Ref. to Emp.:

Ref. to Dept.:

Ref. to Other Person:

Reason:



9/23/2009  
04:20 PM

Universal Health Services  
RISK MANAGEMENT WORKSHEET  
CONFIDENTIAL INFORMATION

PAGE 3

For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

MRN: [REDACTED]

Comments:

Action:

Disposition:

===== RISK EXTENDED SCREEN DATA =====

Date of Dept. Mgr Analysis: 5/22/2008  
Incident Level:  
Steps taken to investigate:  
Staffing Level at Time of Incident: N/A  
Staff Performance Indicators: Agency/Traveler Staff Related  
Actions taken:  
Additional 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 event which has been combined with this one. ☐ Noted. V. Johnson

TAB 56

ORIGINAL

1 **COMP**  
2 NEAL K. HYMAN, ESQ.  
3 Nevada Bar No. 005998  
4 THE LAW OFFICES OF NEAL HYMAN  
5 2441 W. Horizon Ridge Parkway, Suite 120  
6 Henderson, NV 89052  
7 Telephone: (702) 939-5234  
8 Facsimile: (702) 939-5235  
9 Attorneys for Plaintiff

FILED

SEP 2 12 29 PM '08  
*Edmund J. Smith*

CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*

10 ROXANNE CAGNINA, an individual,  
11 Plaintiff,

12 vs.

13  
14 CENTENNIAL HILLS HOSPITAL MEDICAL  
15 CENTER AUXILIARY, a Nevada Corporation;  
16 VALLEY HEALTH SYSTEM LLC; a Nevada  
17 Limited Liability Company, VALLEY HOSPITAL  
18 MEDICAL CENTER, INC. L, a Nevada  
19 Corporation; UNIVERSAL HEALTH SERVICES  
20 FOUNDATION, a Pennsylvania Corporation;  
21 AMERICAN NURSING SERVICES, INC., a  
22 Louisiana Corporation; STEVEN DALE FARMER,  
23 an individual; DOE INDIVIDUALS 1 through 10  
24 and ROE BUSINESS OR GOVERNMENTAL  
25 ENTITIES 1 through 10, inclusive,

26 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:

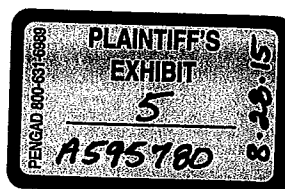
A57-0756  
X

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

I. GENERAL ALLEGATIONS

1. That at all times pertinent hereto and particularly on or about May 15-16, 2008, Plaintiff  
ROXANNE CAGNINA (hereinafter "Plaintiff") was a resident of the State of Nevada, County of Clark.

///



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

SEP 02 2008

RECEIVED

CLERK OF THE COURT

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

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

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

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

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

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

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

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

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

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

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

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

## 8 II. FIRST CAUSE OF ACTION

### 9 (General Negligence/General Negligence Per Se )

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

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

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

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

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

27 ///  
28

1           16.     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, Defendant  
3 STEVEN DALE FARMER sexually assaulted and raped Plaintiff, and engaged in open or gross  
4 lewdness.

5           17.     That due to the nature of Defendant STEVEN DALE FARMER's ill character, lack of  
6 competence, lack of training, background lack of skill, lack of ability and poor reputation, and lack of  
7 proper and effective certification to be a nurses assistant, he was unfit to be employed or utilized as a  
8 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.

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

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

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

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

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

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

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

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

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

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

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

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

28 ///



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.

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

9                                 **III. SECOND CAUSE OF ACTION**

10                                **(Intentional Infliction of Emotional Distress)**

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

13           29.     That as a direct and proximate result of said crimes, acts and terrifying experience as  
14     alleged herein, Plaintiff has suffered severe emotional distress and was injured in her health, strength  
15     and activity, sustaining injury to her body and shock and injury to her nervous system and person, all and  
16     each of which have caused and will continue to cause her physical, mental and nervous pain and  
17     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.

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

27     ///

28     ///

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

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

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

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

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

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

#### 23                               IV. THIRD CAUSE OF ACTION

#### 24                               (Assault and Battery)

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

27     ///

28     ///

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

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

11 41. As a direct and proximate result of said assault and battery by Defendants, Plaintiff  
12 suffered damages and injuries as herein and hereinafter described in an amount in excess of Ten  
13 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.

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

24 **V. FOURTH CAUSE OF ACTION**

25 **(Negligent Misrepresentation)**

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

28 ///

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

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

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

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

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

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

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

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

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

9                               **VI. FIFTH CAUSE OF ACTION**

10                              **(False Imprisonment)**

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

13           56.     Defendants' actions, and each of them, by and through their employees, agents or  
14     independent contractors, directly or indirectly resulted in the confinement of Plaintiff in an elevator,  
15     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.

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

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).

4 62. The acts, conduct or omissions as alleged herein constitute intentional, knowing, willful,  
5 oppressive, reckless or malicious acts/omissions by Defendants, such as to constitute despicable  
6 conduct, or oppression, fraud, conscious disregard or malice and such conduct legally entitling Plaintiff  
7 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.

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

14 **VII. PRAYER FOR RELIEF**

15 **WHEREFORE**, Plaintiff prays for judgment against Defendants, and each of them, as follows:

16 1. For general damages and loss in an amount in excess of Ten Thousand Dollars  
17 (\$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  
19 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;

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

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

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

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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).

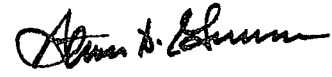
DATED this 2nd day of September, 2008.

**THE LAW OFFICES OF NEAL HYMAN**

By:

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

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CLERK OF THE COURT

1 **ACOM**  
2 NEAL K. HYMAN, ESQ.  
3 Nevada Bar No. 005998  
4 THE LAW OFFICES OF NEAL HYMAN  
5 2441 W. Horizon Ridge Parkway, Suite 120  
6 Henderson, NV 89052  
7 Telephone: (702) 939-5234  
8 Facsimile: (702) 939-5235  
9 *Attorneys for Plaintiff*

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**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

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ROXANNE CAGNINA, an individual,  
Plaintiff,

vs.

VALLEY HEALTH SYSTEM LLC dba Centennial  
Hills Hospital Medical Center; a Nevada Limited  
Liability Company,  
Defendant.

**FIRST AMENDED COMPLAINT  
FOR MONEY DAMAGES**

CASE NO.: A570756  
DEPT. NO.: X

**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**

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



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

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

## 6 II. FIRST CAUSE OF ACTION

### 7 (General Negligence/General Negligence Per Se )

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

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

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

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

21 9. That on or about May 15-16, 2008, Plaintiff arrived at Centennial Hills Hospital for  
22 medical treatment and care. Plaintiff was moved, handled and transported from the emergency room  
23 to a hospital room by STEVEN DALE FARMER who Plaintiff is informed and believes, and thereon  
24 alleges, was working as a nurses assistant at the hospital. STEVEN DALE FARMER was and is at all  
25 times pertinent hereto an agent, servant, employee and/or independent contractor of Defendant working  
26 in the capacity as a nurses assistant. STEVEN DALE FARMER at all times mentioned herein was  
27 acting within the scope and course of said agency or employment with the knowledge, permission and  
28 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.

4           11.     That due to the nature of STEVEN DALE FARMER's ill character, lack of competence,  
5 lack of training, background lack of skill, lack of ability and poor reputation, and lack of proper and  
6 effective certification to be a nurses assistant, he was unfit to be employed or utilized as a nurses  
7 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:

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

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

25               c.     Negligence in failing to hire/screen qualified, trained, able, competent and  
26 reputable staff, agents, employees and independent contractors, including but not limited to STEVEN  
27 DALE FARMER;  
28

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

3 e. Negligence in failing to implement or follow accepted, effective and suitable  
4 policies, practices and procedures, and failing to follow industry standards/standard of care, related to  
5 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  
17 breaches of the standard of care of Defendant, and its employees, agents or independent contractors,  
18 Plaintiff has incurred general and special damages in an amount in excess of Ten Thousand Dollars  
19 (\$10,000.00).

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

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

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

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

9                               **III. SECOND CAUSE OF ACTION**

10                           **(Intentional Infliction of Emotional Distress)**

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

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

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

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

26     ///

27     ///

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

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

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

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

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

18           31.     That as a direct and proximate result of the acts or conduct of Defendants, and each of  
19 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                               IV. THIRD CAUSE OF ACTION

##### 23                               (Assault and Battery)

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

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

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

3 34. That the aforesaid conduct or acts on the part of Defendant, by and through its employees,  
4 agents or independent contractors, were committed while in an agency, employ, joint venture,  
5 partnership or assignment and, therefore, Defendant is vicariously, contractually, statutorily, or otherwise  
6 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.

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

20 **V. FOURTH CAUSE OF ACTION**

21 **(Negligent Misrepresentation)**

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

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

28 ///

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

6 42. 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,  
8 qualified, capable, able, competent, suitable, authorized and supervised professionals and employees  
9 who would handle and transport her safely and with care and who would not sexually assault/rape their  
10 patients or Plaintiff, and who would not engage in gross or open lewdness.

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

16 44. Plaintiff did rely on the oral and written representations made by Defendant when she was  
17 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  
20 of Ten Thousand Dollars (\$10,000.00).

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

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

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

5 **VI. FIFTH CAUSE OF ACTION**

6 **(False Imprisonment)**

7 49. Plaintiff incorporates by reference the above-mentioned paragraphs as though set forth  
8 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.

16 52. Plaintiff was detained and confined without her consent or privilege or justification, and  
17 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.

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

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

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

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

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

11                               **VII. PRAYER FOR RELIEF**

12           **WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- 13           1.     For general damages and loss in an amount in excess of Ten Thousand Dollars  
14     (\$10,000.00) to be determined at time of trial;
- 15           2.     For special damages in an amount in excess of Ten Thousand Dollars (\$10,000.00) to be  
16     determined at time of trial;
- 17           3.     For punitive damages in an amount in excess of Ten Thousand (\$10,000.00) to be  
18     determined at time of trial;
- 19           4.     For reasonable attorney's fees and costs of suit;
- 20           5.     For pre-judgment and post-judgment interest;

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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;

3           DATED this 28<sup>th</sup> day of April, 2010.

4  
5                           **THE LAW OFFICES OF NEAL HYMAN**

6  
7                           By: 

8                           NEAL K. HYMAN, ESQ.

9                           Nevada Bar No. 005998

10                          2441 W. Horizon Ridge Parkway, Ste. 120

11                          Henderson, NV 89052

12                          702 939-5234

13                          Attorneys for Plaintiff

**CERTIFICATE OF E-SERVICE AND E-FILING**

Pursuant to NRCP 5(b) I certify on this 28<sup>th</sup> day of April 2010, I e-filed and served the foregoing  
*FIRST AMENDED COMPLAINT FOR MONEY DAMAGES* on all parties to this action by way of e-  
service and e-filing through Wiznet.com to the following recipients on the E-Service Master List fo  
Case:

Hall Prangle & Schoonveld  
Contact Email  
Audrey Stephanski astephanski@hpslaw.com

Hall Prangle & Schoonveld, LLC  
Contact Email  
David P. Ferrainolo, Esq. dferrainolo@hpslaw.com

The Law Offices of Neal Hyman  
Contact Email  
Deanna L. Slominski, Paralegal deanna@lawyerinvegas.com  
Neal K. Hyman, Esq. neal@lawyerinvegas.com  
Rhonda R. Long, Esq. rhonda@lawyerinvegas.com

By:   
An employee of The Law Offices of Neal Hyman

Y:\Server Documents\Client Files\Client Files\C\Cagnina3-Centennial Hills\Pleading\first amended complaint.wpd

TAB 53

# Centennial Hills Hospital MEDICAL CENTER

## "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
5-14-2008	1 <sup>st</sup>	LAMPTON	CUNNINGHAM		KING
Start	End	Activity Performed			
0700		S/O LAMPTON, CUNNINGHAM AND SUPERVISOR KING ON DUTY. BRIEFED BY 3 <sup>rd</sup> SHIFT ON ALL SECURITY MATTERS. ALL KEYS AND RADIO TURNED OVER. (7) VALUABLE ENVELOPES IN SAFE AND (4) CONTRACTOR BADGES IN SAFE.			
	0730	S/O GAMBERO, MOTIS AND STROTHER OFF DUTY.			
0730	0745	UNLOCKED DOOR TO MARKETING FOR ENGINEERING.			
0730	0740	SECURITY PERFORMED AN INTERIOR PATROL OF THE NORTH AND SOUTH E/R AREA. NORTH E/R: MAJOR TREATMENT ROOM #S 36-40, EMS WORKROOM, AMBULANCE BAY, E/R NURSES STATION, PATIENT ROOM #S 30-47. SOUTH E/R: PATIENT ROOM #S 1-23, SOUTH NURSES STATION, TRIAGE ONE, TWO & THREE AND THE CONSULTATION ROOM.			
0740	0745	UNLOCKED DOOR TO 7 SOUTH OFFICE FOR STAFF.			
0745	0800	INTERIOR PATROL OF THE E/R ADMITTING, MAIN LOBBY ADMITTING, E/R ADMITTING, E/R ADMITTING LOBBY, LOSS CONTROL, CASE MANAGEMENT, SCHEDULING FINANCE, ELECTRICAL ROOM AND A STORAGE ROOM, MAIN LOBBY, ADMITTING, CONCIERGE, HELP DESK, PRE-ADMIT TESTING, DIAGNOSTIC IMAGING, OUTPATIENT SURGERY, OUTPATIENT WAITING AREA, GIFT SHOP, STAIRWELL #2 AND THE VISITORS ELEVATORS.			
0805	0810	UNLOCKED DOOR TO VOLUNTEERS OFFICE FOR STAFF.			
0810	0815	UNLOCKED DOOR TO EDUCATION FOR TRAINING CLASS.			
0825	0830	ASSIST NURSE WITH PATIENT IN ROOM. PATIENT BEING UNCOOPERATIVE.			
0855	0905	UNLOCKED DOOR TO DECONTAMINATION ROOM.			
0900	0920	CODE PINK ON NORTH STAIRWELL WAS A FALSE ALARM CAUSED BY TRI SIGNAL WORKING ON FIRE ALARM SYSTEM.			
0930	0935	UNLOCKED DOOR DOOR TO HEALTH OFFICE FOR STAFF.			
0940	1000	CODE PINK ON SOUTH STAIRWELL WAS A FALSE ALARM CAUSED BY TRI SIGNAL WORKING ON FIRE ALARM SYSTEM.			
1005	1045	INTERIOR PATROL OF THE LOADING DOCK, HALLWAY, BED STORAGE, CLINICAL ENGINEERING, CENTRAL PLANT, DATA ROOM, EYS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY, LAB MATERIALS MANAGEMENT, IV STORAGE, CENTRAL STORAGE, DECONTAM, PHARMACY, PHARMACY DISTRIBUTION, MEDICAL RECORDS, LAB, MEDICAL STAFF SERVICES, ELECTRICAL ROOM, INFORMATION SERVICES, HOUSEKEEPING, SURGERY, ON-CALL ROOMS ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD, FLUOROSCOPY, FILE ROOM, GATH LAB STORAGE, ECHO, EKG, VIEWING ROOM, CATH LAB, MRI, SPECIAL PROCEDURES ONE & TWO, SOUTH IMAGING AREA, RADIOLOGY ONE & TWO, NUCLEAR MEDICINE ONE & TWO, HOT LAB, ULTRA SOUND ONE & TWO, STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK.			
1040	1045	LOCKED DOOR TO EDUCATION TRAINING ROOM FOR STAFF.			
1045	1130	INTERIOR PATROL. SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR: WOMEN'S CENTER, LABOR AND DELIVERY, PUBLIC WAITING AREA, OR TRIAGE AREA, ALL NURSING STATIONS, PUBLIC RESTROOMS, PATIENT ROOMS # 201-225, THE 3 <sup>rd</sup> 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup> , 7 <sup>th</sup> AND 8 <sup>th</sup> FLOOR 3RD & 4 <sup>th</sup> FLOOR STORAGE AREAS, PATIENT ROOMS 801-832, 601-636, 701-736, 801-836, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
1140	1150	SECURITY PERFORMED AN INTERIOR PATROL OF THE NORTH AND SOUTH E/R AREA. NORTH E/R: MAJOR TREATMENT ROOM #S 36-40, EMS WORKROOM, AMBULANCE BAY, E/R NURSES STATION, PATIENT ROOM #S 30-47. SOUTH E/R: PATIENT ROOM #S 1-23, SOUTH NURSES STATION, TRIAGE ONE, TWO & THREE AND THE CONSULTATION ROOM.			

PLTF'S PROPOSED

SDAL001400

EXHIBIT # 2

Case #

A595780

AA2400

1200	1215	INTERIOR PATROL OF THE E/R ADMITTING, MAIN LOBBY ADMITTING, E/R ADMITTING, E/R ADMITTING LOBBY, LOSS CONTROL, CASE MANAGEMENT, SCHEDULING, FINANCE, ELECTRICAL ROOM AND A STORAGE ROOM, MAIN LOBBY, ADMITTING, CONCIERGE, HELP DESK, PRE-ADMIT TESTING, DIAGNOSTIC IMAGING, OUTPATIENT SURGERY, OUTPATIENT WAITING AREA, GIFT SHOP, STAIRWELL 2 AND THE VISITORS ELEVATORS.
1220	1300	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL E/R CIRCLE DRIVE, WEST E/R PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, E/R AMBULANCE BAY, NORTHWEST E/R PARKING AREA.
1310	1325	SECURITY PERFORMED AN INTERIOR PATROL OF THE NORTH AND SOUTH E/R AREA, NORTH E/R MAJOR TREATMENT ROOM #S 36-40, EMS WORKROOM, AMBULANCE BAY, E/R NURSES STATION, PATIENT ROOM #S 30-47, SOUTH E/R PATIENT ROOM #S 123, SOUTH NURSES STATION, TRIAGE ONE, TWO & THREE AND THE CONSULTATION ROOM.
1330	1345	ILLEGAL PARKING IN DOCTORS LOT FOLLOW UP COMPLETED.
1345	1405	VALUABLES RETURN TO PATIENT [REDACTED] ENVELOPE.
1405	1450	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR WOMEN'S CENTER, LABOR AND DELIVERY, PUBLIC WAITING AREA, O/R TRIAGE AREA, ALL NURSING STATIONS, PUBLIC RESTROOMS, PATIENT ROOMS 201-225, THE 3RD, 4TH, 5TH, 6TH, 7TH AND 8TH FLOOR, 3RD & 4TH FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 501-636, 701-736, 801-836, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.
1440	1450	VALUABLES PICKUP FROM E/R 45 FROM PATIENT [REDACTED] ENVELOPE PLACED IN SAFE.
1500		S/O GUNNINGHAM, CORRO AND HAHN ON DUTY ADVISED THEM ON ALL SECURITY MATTERS, PASSED ON ALL KEYS AND RADIOS.
	1530	S/O LAMPTON AND SUPERVISOR KING OFF DUTY.

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =
Assist = 1	Escort Off Property =	Parking Violation = 1
Code Lift =	Forensic =	Robbery =
Code Pink = 2	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock = 7	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 9	Valuable Pickup = 1
Disturbance =	Jump Start Vehicle =	Valuable Return = 1
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance =	Mob Patrol =	

SDAL001401

AA2401



# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05-14-08	2 <sup>ND</sup>	CUNNINGHAM	HAHN	CORRO	
Start	End	Activity Performed			
1500		S/O CORRO, S/O HAHN S/O CUNNINGHAM ON DUTY BRIEFED BY 1 <sup>ST</sup> SHIFT ON ALL SECURITY MATTERS OF THE DAY. ALL RADIOS AND KEYS TURNED OVER TO 2 <sup>ND</sup> SHIFT. SEVEN (7) VALUABLES ENVELOPES WERE ACCOUNTED FOR.			
	1630	S/S KING AND S/O LAMPTON OFF DUTY.			
1500	1700	OFFICER CORRO IS STATIONED AT ER ALARM PANEL MONITORING STATION.			
1530	1540	VALUABLES PICK UP FROM PATIENT [REDACTED] ENVELOPE # [REDACTED]			
1540	1545	VALUABLES RETURN TO PATIENT [REDACTED]			
1600	1700	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYEE HEALTH SERVICES PERFORMANCE IMPROVEMENT INFECTION CONTROL RISK MANAGEMENT CONFERENCE ROOM ONE & TWO EDUCATION SOUTH RESTROOMS STORAGE ROOM ONE & TWO AND THE HILL'S CAFE 2 <sup>ND</sup> FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS # 201-225 THE 3 <sup>RD</sup> , 4 <sup>TH</sup> , 5 <sup>TH</sup> , 6 <sup>TH</sup> , 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
1545	1700	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL E/R CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY EMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA MONITORED EMPLOYEE PARKING LOT.			
1700	1730	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYEE HEALTH SERVICES PERFORMANCE IMPROVEMENT INFECTION CONTROL RISK MANAGEMENT CONFERENCE ROOM ONE & TWO EDUCATION SOUTH RESTROOMS STORAGE ROOM ONE & TWO AND THE HILL'S CAFE LOCKED BED STORAGE.			
1730	1800	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL E/R CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY EMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA MONITORED EMPLOYEE PARKING LOT.			
1800	1810	ASSIST NURSE NEEDED ASSISTANCE GETTING INTO HER VEHICLE KEY WOULD NOT WORK IN DOOR SECURITY OPENED DRIVER SIDE DOOR AND CHECKED VEHICLE REGISTRATION AGAINST NURSE NY D L CODE 4.			
1810	1815	VALUABLES RETURN TO PATIENT [REDACTED]			
1815	1845	INTERIOR PATROL OF THE 3 <sup>RD</sup> , 4 <sup>TH</sup> , 5 <sup>TH</sup> , 6 <sup>TH</sup> , 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			

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1845	1930	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL I/E/CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY EMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA MONITORED EMPLOYEE PARKING LOT
1930	2000	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL OF THE MOB BUILDING INCLUDING 1 <sup>ST</sup> , 2 <sup>ND</sup> , 3 <sup>RD</sup> , AND 4 <sup>TH</sup> FLOORS
2000	2005	LOCKED THE MOB HALLWAY SECURING FOUR (4) DOORS
2005	2010	LOCKED FRONT ENTRANCE DOORS TWO (2) DOORS
2000	2400	S/O CAMBERO POSTED IN EMPLOYEE LOT
2010	2030	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYEE HEALTH SERVICES PERFORMANCE IMPROVEMENT INFECTION CONTROL RISK MANAGEMENT CONFERENCE ROOM ONE & TWO EDUCATION SOUTH RESTROOMS STORAGE ROOM ONE & TWO AND THE HILLS CAFE 2 <sup>ND</sup> FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS #201-225
2030	2040	LOCKED FOUR DOORS (4) LOCKED UP POST TOP
2050	2100	VALUABLES PICKUP FROM PATIENT [REDACTED] IN ROOM [REDACTED] ENVELOPE # [REDACTED]
2105	2120	NURSE ASSIST. A GUEST WAITING IN E/R LOBBY TO TRIAGED PASSED OUT AND FELL TO THE FLOOR SECURITY ASSISTED E/R STAFF LIFTING PATIENT ONTO GURNEY AND INTO E/R
2130	2150	INTERIOR PATROL OF THE LOADING DOCK HALLWAY BED STORAGE CLINICAL ENGINEERING CENTRAL PLANT DATA ROOM EYS STORAGE MAINTENANCE CLEAN UTILITY MORGUE SOILED UTILITY LAB MATERIALS MANAGEMENT I.V. STORAGE CENTRAL STORAGE DECONTAM PHARMACY PHARMACY DISTRIBUTION MEDICAL RECORDS LAB MEDICAL STAFF SERVICES ELECTRICAL ROOM INFORMATION SERVICES HOUSEKEEPING SURGERY ON CALL ROOMS ONE & TWO OUT PATIENT SURGERY MALE & FEMALE LOCKERS DIAGNOSTIC IMAGING INPATIENT HD DIFLUOROSCOPY FILE ROOM CATH LAB STORAGE ESHD EKG VIEWING ROOM CATH LAB MRI SPECIAL PROCEDURES ONE & TWO SOUTH IMAGING AREA RADIOLOGY ONE & TWO NUCLEAR MEDICINE ONE & TWO HOT LAB ULTRA SOUND ONE & TWO STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK
2200	2215	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL I/E/CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY EMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA MONITORED EMPLOYEE PARKING LOT
2215	2300	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYEE HEALTH SERVICES PERFORMANCE IMPROVEMENT INFECTION CONTROL RISK MANAGEMENT CONFERENCE ROOM ONE & TWO EDUCATION SOUTH RESTROOMS STORAGE ROOM ONE & TWO AND THE HILLS CAFE 2 <sup>ND</sup> FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS #201-225 THE 3 <sup>RD</sup> , 4 <sup>TH</sup> , 5 <sup>TH</sup> , 6 <sup>TH</sup> , 7 <sup>TH</sup> , AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS #501-532, 601-636, 701-736, 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS
2300		S/O CAMBERO S/O NOTIS S/O ENK ON DUTY
	2330	S/O CUNNINGHAM S/O CORRO S/O HAHN OFF DUTY

SDAL001403



**End of Shift Activities Total**

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =
Code Blue =	Escort Off Property =	Parking Violation =
Code Pink =	Forensic =	Robbery =
Code Red =	Funds Escort =	Restraint =
Code Rush =	Helicopter =	Stolen Vehicle =
Damaged Property =		Towed Vehicle =
Disturbance =	Jump Start Vehicle =	
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =		
E/R Disturbance =		

SDAL001404

AA2404

# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
5/14/08	3 <sup>RD</sup>	ENK	MOTIS	CAMBERO	
Start	End	Activity Performed			
2300		S/O CAMBERO, S/O MOTIS AND S/O ENK CHECKED ON DUTY, BRIEFED ON THE EVENING ACTIVITY. ALL KEYS AND RADIO'S WERE TURNED OVER. (7) VALUABLES IN THE SAFE. (5) CONTRACTOR BADGES IN THE SAFE.			
2300	0700	SECURITY OFFICER STATIONED IN E/R BY ALARM PANEL.			
	2330	S/O HAHN, S/O CORRO AND S/O GUNNINGHAM CHECKED OFF DUTY.			
2330	2345	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE.			
2340		DISTURBANCE: PATIENT [REDACTED] IN ROOM/BED [REDACTED] PATIENT WAS CALLING NURSES NAMES AND YELLING. SECURITY ADVISED PATIENT TO CALM DOWN AND GET BACK INTO BED WITHOUT INCIDENT CODE 4.			
0000		UNLOCKED TWO (2) MAIN DIETARY DOORS FOR NIGHT SHIFT. (3 DOORS)			
0100	0200	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE, MEDIATION ROOM, DIAGNOSTIC IMAGING, CONSULTATION ROOM, 1 <sup>ST</sup> FLOOR, PRE & POST PROCEDURE CARE UNITS, PRE & POST PROCEDURE WAITING AREAS, SURGERY, INPATIENT HOLDING ROOM, CATH LAB, CATH LAB CONTROL ROOM, SERVICE ELEVATORS, HOT LAB, ENDOSCOPY, CENTRAL STERILE, MATERIALS MANAGEMENT, CENTRAL PLANT, EYS, MORGUE HOLDING, MAIL ROOM, CAFE, DIETARY, PHYSICIANS DINING, MEDICAL RECORDS, CLINICAL FILES, MAIN ELEVATORS, MAIN ENTRANCE, EXT STAIRS (NORTH AND SOUTH), NURSE STAFFING OFFICE, MARKETING OFFICE, I.S. OFFICE, ADMINISTRATION OFFICES, 2 <sup>ND</sup> FLOOR WOMEN'S CENTER, MATERNITY, LABOR & DELIVERY, I & D WAITING AREA, ROOMS 201 TO 225, 5 <sup>TH</sup> FLOOR (IMG), ROOMS 501 TO 502, 6 <sup>TH</sup> FLOOR ROOMS 601 TO 636, 7 <sup>TH</sup> FLOOR ROOMS 701 TO 736. ALL RESTROOMS CHECKED AND WAITING AREAS CHECKED. CODE 4. OFFICER ALSO MONITORED THE E/R ENTRANCE AND ASSISTED ADMITTING AS NEEDED.			
0205	0335	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR, BUILDING EXTERIOR. CODE 4 AT THIS TIME.			
0205		LOCKED TWO (2) MAIN DIETARY DOORS FOR NIGHT SHIFT. (2 DOORS)			
0210	0315	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE.			
0300		LOCKED ONE (1) DOOR FOR CATERIA. (1 DOOR)			
0315	0345	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR, BUILDING EXTERIOR. CODE 4 AT THIS TIME.			

SDAL001405

0400	0420	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 6, CONCIERGE OFFICE.
0415	0515	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR BUILDING, EXTERIOR CODE 4 AT THIS TIME.
0455	0530	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 6, CONCIERGE OFFICE.
0500		PBX RECEIVED TWO KEYS FOR THE DAY.
0500		UNLOCKED MAIN ENTRANCE FOR THE DAY (2 DOORS).
0500		UNLOCKED TWO (2) EXTERIOR GLASS DOORS IN MOB HALLWAY (2 DOORS).
0505		UNLOCKED MOB HALLWAY ENTRANCE (1 DOOR).
0500		UNLOCKED ADMINISTRATIVE CONFERENCE ROOM FOR THE DAY (1 DOOR).
0505		UNLOCKED MOB HALLWAY ENTRANCE (1 DOOR).
0510		UNLOCKED MAIL ROOM FOR THE DAY (1 DOOR).
0515		UNLOCKED PACU FOR THE DAY (1 DOOR).
0520		UNLOCKED RECOVERY FOR THE DAY (1 DOOR).
0525		UNLOCKED SOCIAL WORKERS OFFICE ON THE 7 <sup>TH</sup> FLOOR (1 DOOR).
0630	0700	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR BUILDING, EXTERIOR CODE 4 AT THIS TIME.
0600	0700	EXTERIOR DOCTORS PATROL.
0700		S/O NICHOLS, S/O LAMPTON AND S/O AMBASSADOR KING ON DUTY.
	0730	S/O MOTIS, S/O CAMBERO AND S/O ENK OFF DUTY.

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =
Assist =	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock = 16	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 8	Valuable Pickup =
Disturbance = 1	Jump Start Vehicle =	Valuable Return =
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance =	Mob Patrol =	

SDAL001406

AA2406



# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05/15/08	1ST	NICHOLS	LAMPTON		KING
Start	End	Activity Performed			
0700		S/O LAMPTON, NICHOLS AND SUPERVISOR KING ON DUTY BRIEFED BY 3 <sup>RD</sup> SHIFT ON ALL SECURITY MATTERS. ALL KEYS AND RADIO TURNED OVER. (9) VALUABLE ENVELOPES IN SAFE AND (4) CONTRACTOR BADGES IN SAFE.			
	0730	SECURITY OFFICER POSTED IN THE EIR.			
	0730	S/O MOTIS, ENK AND CAMBERO OFF DUTY.			
0730	0800	INTERIOR PATROL OF THE LOADING DOCK, HALLWAY, BED STORAGE, CLINICAL, ENGINEERING, CENTRAL PLANT, DATA ROOM, EVS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY, LAB MATERIALS MANAGEMENT, IV STORAGE, CENTRAL STORAGE, DECONTAM, PHARMACY, PHARMACY DISTRIBUTION, MEDICAL RECORDS, LAB, MEDICAL STAFF SERVICES, ELECTRICAL ROOM, INFORMATION SERVICES, HOUSEKEEPING, SURGERY, ON CALL ROOMS, ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD, FLUOROSCOPY, FILE ROOM, CATH LAB, STORAGE, ECHO, EKG, VIEWING ROOM, BATH LAB, MRI, SPECIAL PROCEDURES, ONE & TWO, SOUTH IMAGING AREA, RADIOLOGY ONE & TWO, NUCLEAR MEDICINE ONE & TWO, HOT LAB, ULTRA SOUND ONE & TWO, STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK.			
0745	0830	INTERIOR PATROL. SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR: WOMEN'S CENTER, LABOR AND DELIVERY, PUBLIC WAITING AREA, OR, TRACE AREA, ALL NURSING STATIONS, PUBLIC RESTROOMS, PATIENT ROOMS 4201-220, THE 3 <sup>RD</sup> FLOOR: 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.			
0800	0845	EXTERIOR PATROL. SECURITY PERFORMED AN EXTERIOR PATROL: EIR, CIRCLE DRIVE, WEST EIR, PARKING AREA, MAIN LOBBY, CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY, PARKING, MEDICAL OFFICE BUILDING, WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING, WEST LOBBY, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, EIR, AMBULANCE BAY, NORTHWEST EIR, PARKING AREA.			
0845	0915	INTERIOR PATROL OF THE MOB, CAFE, HALLWAY, NORTH DIETARY ENTRANCE, PHYSICIAN DINING, ELECTRICAL ROOM, EMPLOYEE MALE & FEMALE LOCKERS, EAST DIETARY ENTRANCE, EMPLOYEE ENTRANCE AND THE MAIL ROOM, LOADING DOCK, HALLWAY, BED STORAGE, CLINICAL, ENGINEERING, CENTRAL PLANT, DATA ROOM, EVS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY AND THE LOADING DOCK, MAIN HALLWAY W/ SERVICE ELEVATORS, INFORMATION SERVICES, HOUSEKEEPING, SURGERY, ON CALL ROOMS, ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD AND A WORKROOM, EIR, ADMITTING, MAIN LOBBY, ADMITTING, EIR, ADMITTING, EIR, ADMITTING, LOBBY, LOSS CONTROL, CASE MANAGEMENT, SCHEDULING, FINANCE, ELECTRICAL ROOM AND A STORAGE ROOM, MAIN LOBBY, ADMITTING, CONCIERGE, HELP DESK, PRE ADMIT, TESTING, DIAGNOSTIC IMAGING, OUTPATIENT SURGERY, OUTPATIENT WAITING AREA, GIFT SHOP, STAIRWELL #2, AND THE VISITORS ELEVATORS.			
0900	0930	INTERIOR PATROL OF THE MAIN HALLWAY W/ SERVICE ELEVATORS, INFORMATION SERVICES, HOUSEKEEPING, SURGERY, ON CALL ROOMS, ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD AND A WORKROOM, EIR, ADMITTING, MAIN LOBBY, ADMITTING, EIR, ADMITTING, EIR, ADMITTING, LOBBY, LOSS CONTROL, CASE MANAGEMENT, SCHEDULING, FINANCE, ELECTRICAL ROOM.			

SDAL001407

Code Red =	Helicopter = 1	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock =	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 11	Valuable Pickup = 1
Disturbance = 1	Jump Start Vehicle =	Valuable Return =
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance = 1	Mob Patrol =	

SDAL001408

AA2408

# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05-15-08	2nd	CUNNINGHAM	ROSS	MOTIS	
Start	End	Activity Performed			
1500		S/O MOTIS, S/O ROSS, S/O CUNNINGHAM ON DUTY. BRIEFED BY S/O [REDACTED] ON ALL SECURITY MATTERS OF THE DAY. ALL RADIOS AND KEYS TURNED OVER TO 2nd SHIFT. EIGHT (8) VALUABLES ENVELOPES WERE ACCOUNTED FOR.			
	1530	S/O KING AND S/O LAMPTON AND S/O NICHOLS OFF DUTY.			
1500		OFFICER MOTIS IS STATIONED AT FIRE ALARM PANEL MONITORING STATION.			
1545	1645	EXTERIOR PATROL: SECURITY PERFORMED AN EXTERIOR PATROL: EIR CIRCLE DRIVE, WEST EIR PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, EIR AMBULANCE BAY, NORTHWEST EIR PARKING AREA. MONITORED EMPLOYEE PARKING LOT.			
1600	1630	INTERIOR PATROL OF THE 3rd, 4th, 5th, 6th, 7th AND 8th FLOOR, 3RD & 4th FLOOR STORAGE AREAS, PATIENT ROOMS, 501-532, 601-636, 701-736, 801-836, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
1630	1730	EXTERIOR PATROL: SECURITY PERFORMED AN EXTERIOR PATROL: EIR CIRCLE DRIVE, WEST EIR PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, EIR AMBULANCE BAY, NORTHWEST EIR PARKING AREA. MONITORED EMPLOYEE PARKING LOT.			
1645	1730	S/O ROSS RELIEVED S/O MOTIS FROM MONITORING THE ALARM PANEL.			
1700	1800	INTERIOR PATROL: SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR: FINANCIAL SERVICES, ADMINISTRATION, MARKETING, STAFF TRAINING, HUMAN RESOURCES, NURSE STAFFING, ADMINISTRATION CONFERENCE CENTER, EMPLOYEE HEALTH SERVICES, PERFORMANCE IMPROVEMENT, INFECTION CONTROL, RISK MANAGEMENT, CONFERENCE ROOM ONE & TWO, EDUCATION, SOUTH RESTROOMS, STORAGE ROOM ONE & TWO AND THE HILLS CAFE.			
1800	1815	VALUABLES RETURN TO PATIENT [REDACTED]			
1815	1845	INTERIOR PATROL OF THE 3rd, 4th, 5th, 6th, 7th AND 8th FLOOR, 3RD & 4th FLOOR STORAGE AREAS, PATIENT ROOMS, 501-532, 601-636, 701-736, 801-836, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
1900	1910	CODE PINK: NURSE WAS CARRYING FAC THAT WAS REMOVED FROM BABY BUT NOT DEACTIVATED. NURSE GOT TOO CLOSE TO SOUTH STAIRWELL DOOR AND ACTIVATED PROSEC.			
1910	1930	EXTERIOR PATROL: SECURITY PERFORMED AN EXTERIOR PATROL: EIR CIRCLE DRIVE, WEST EIR PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, EIR AMBULANCE BAY, NORTHWEST EIR PARKING AREA. MONITORED EMPLOYEE PARKING LOT.			

SDAL001409

AA2409



1930	1935	VALUABLES PICK UP FROM PATIENT IN ENVELOPE
2000	2000	LOCKED FRONT ENTRANCE TWO (2) DOORS
2100	2140	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL OF THE MOB BUILDING INCLUDING 1 <sup>ST</sup> , 2 <sup>ND</sup> , 3 <sup>RD</sup> AND 4 <sup>TH</sup> FLOORS
2100	2100	LOCKED MOB SIDE ENTRANCES TWO (2) DOORS
2200	2230	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES ADMINISTRATION MARKETING STAFF TRAINING HUMAN RESOURCES NURSE STAFFING ADMINISTRATION CONFERENCE CENTER EMPLOYEE HEALTH SERVICES PERFORMANCE IMPROVEMENT INFECTION CONTROL RISK MANAGEMENT CONFERENCE ROOM ONE & TWO EDUCATION SOUTH RESTROOMS STORAGE ROOM ONE & TWO AND THE HILLS CAFE 2 <sup>ND</sup> FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA OR TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS # 201-225
2205	2205	LOCKED EDUCATION OFFICE & ADMINISTRATION CONFERENCE ROOM TWO (2) DOORS
2210	2210	LOCKED DIETARY THREE (3) DOORS
2230	2230	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL E/R CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTH WEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY EMPLOYEE PARKING CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA MONITORED EMPLOYEE PARKING LOT
2230	2300	INTERIOR PATROL OF THE LOADING DOCK HALLWAY BED STORAGE CLINICAL ENGINEERING CENTRAL RENT DATA ROOM E/R STORAGE MAINTENANCE CLEAN UTILITY MORGUE SOILED UTILITY LAB MATERIALS MANAGEMENT IV STORAGE CENTRAL STORAGE DECONTAM PHARMACY PHARMACY DISTRIBUTION MEDICAL RECORDS LAB MEDICAL STAFF SERVICES ELECTRICAL ROOM INFORMATION SERVICES HOUSEKEEPING SURGERY ON CALL ROOMS ONE & TWO OUTPATIENT SURGERY MALE & FEMALE LOCKERS DIAGNOSTIC IMAGING INPATIENT HOLD FLUOROSCOPY FILE ROOM CATH LAB STORAGE ECHO EKG VIEWING ROOM CATH LAB MR SPECIAL PROCEDURES ONE & TWO SOUTH IMAGING AREA RADIOLOGY ONE & TWO NUCLEAR MEDICINE ONE & TWO HOT LAB ULTRASOUND ONE & TWO STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK
2300		S/O CAMBERO, S/O CORRO, S/O ENK ON DUTY
	2330	S/O GUNNINGHAM, S/O MOTIS, S/O ROSS OFF DUTY

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =
Assist =	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =		Towed Vehicle =
Damaged Property =		
Disturbance =	Jump Start Vehicle =	
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =		
E/R Disturbance =		

SDAL001410

# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
5/15/08	3 <sup>RD</sup>	ENK	CAMBERO	CORRO	
Start	End	Activity Performed			
2300		S/O CAMBERO, S/O CORRO AND S/O ENK CHECKED ON DUTY. BRIEFED ON THE EVENING ACTIVITY. ALL KEYS AND RADIOS WERE TURNED OVER. (8) VALUABLES IN THE SAFE. (5) CONTRACTOR BADGES IN THE SAFE.			
2300	0700	SECURITY OFFICER STATIONED IN EIR BY ALARM PANEL.			
2305	2315	ESCORT LAB TECH FROM ADMITTING TO LAB.			
2300		S/O CAMBERO, S/O CORRO AND S/O ENK CHECKED ON DUTY. BRIEFED ON THE EVENING ACTIVITY. ALL KEYS AND RADIOS WERE TURNED OVER. (8) VALUABLES IN THE SAFE. (8) CONTRACTOR BADGES IN THE SAFE.			
2340	2355	E/R DISTURBANCE/ESCORT OFF PROPERTY. PATIENT [REDACTED] IN EIR ROOMBED [REDACTED]. PATIENT IS A LEGAL HOLD AND IS IN THE PROCESS OF BEING DISCHARGED. PATIENT'S DAUGHTER WAS UPSETTING HER AND GETTING PATIENT AGITATED. PATIENT STARTED SCREAMING PROFANITIES AT DAUGHTER AND SWUNG AT HER. DAUGHTER WAS ADVISED TO LEAVE BY SECURITY AND WOULD NOT FOLLOW INSTRUCTIONS. DAUGHTER WAS THEN ESCORTED TO HER VEHICLE AND INSTRUCTED NOT TO RETURN OR METRO WILL BE CALLED. CODE 4.			
2345	0000	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND EIR ROOMS 30 THRU 47. ADMITTING TRIAGE 1 & 2. EIR CONSULTATION ROOM. MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41. MEDIC STAFF ROOM. FINANCE OFFICE. SCHEDULING OFFICE. CASE MANAGEMENT OFFICE. LOSS CONTROL OFFICE. MAIN LOBBY. MAIN LOBBY ADMITTING STATIONS 1 THRU 5. CONCIERGE OFFICE.			
0005		UNLOCKED TWO (2) MAIN DIETARY DOORS FOR NIGHT SHIFT. (3 DOORS)			
0010	0030	DISTURBANCE/NURSE ASSIST. PATIENT [REDACTED] IN ROOMBED # 685. PATIENT NOT FOLLOWING NURSES INSTRUCTIONS. SECURITY ADVISED PATIENT TO LAY BACK IN BED AND FOLLOW NURSES INSTRUCTIONS WITHOUT INCIDENT. CODE 4.			
0030	0035	VALUABLE PICK UP. PATIENT [REDACTED] IN EIR ROOMBED [REDACTED]. ITEMS PLACED IN ENVELOPE [REDACTED] AND PLACED IN SECURITY SAFE. BAG 2 OF 2.			
0050	0100	VALUABLE PICK UP. PATIENT [REDACTED] IN EIR ROOMBED # 13. ITEMS PLACED IN ENVELOPE [REDACTED] AND PLACED IN SECURITY SAFE.			
0100		RECEIVED TWO KEYS FROM RBX.			
0100	0130	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS. ALL ENTRANCES. PORTICO'S. AMBULANCE ENTRANCE. HELIPAD. LOADING DOCK. CENTRAL PLANT. COOLING TOWERS. STAFF ENTRANCE. DIETARY PATIO. MOB EXTERIOR BUILDING. EXTERIOR. CODE 4 AT THIS TIME.			
0130	0200	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND EIR ROOMS 30 THRU 47. ADMITTING TRIAGE 1 & 2. EIR CONSULTATION ROOM. MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41. MEDIC STAFF ROOM. FINANCE OFFICE. SCHEDULING OFFICE. CASE MANAGEMENT OFFICE. LOSS CONTROL OFFICE. MAIN LOBBY. MAIN LOBBY ADMITTING STATIONS 1 THRU 5. CONCIERGE OFFICE. MEDITATION ROOM. DIAGNOSTIC IMAGING CONSULTATION ROOM. (5 <sup>TH</sup> FLOOR). PRE & POST PROCEDURE CARE UNITS. PRE & POST PROCEDURE WAITING AREAS. SURGERY. INPATIENT HOLDING ROOM. CATH LAB. CATH LAB CONTROL ROOM. SERVICE ELEVATORS. HOT LAB. ENDOSCOPY. CENTRAL STERILE. MATERIALS MANAGEMENT. CENTRAL PLANT. EVS. MORGUE HOLDING. MAIL ROOM. CAFE. DIETARY. PHYSICIANS DINING. MEDICAL RECORDS. CLINICAL FILES. MAIN ELEVATORS. MAIN ENTRANCE. EXIT STAIRS (NORTH AND SOUTH). NURSE STAFFING OFFICE. MARKETING OFFICE. I.S. OFFICE.			

SDAL001411



		ADMINISTRATION OFFICES 2 <sup>ND</sup> FLOOR WOMEN'S CENTER MATERNITY LABOR & DELIVERY L&D WAITING AREA ROOMS 201 TO 225 5 <sup>TH</sup> FLOOR (M/C) ROOMS 601 TO 632 6 <sup>TH</sup> FLOOR ROOMS 601 636 7 <sup>TH</sup> FLOOR ROOMS 701 TO 736 ALL RESTROOMS CHECKED AND WAITING AREAS CHECKED CODE 4 OFFICER ALC MONITORED THE ER ENTRANCE AND ASSISTED ADMITTING AS NEEDED.
0200		LOCKED TWO (2) MAIN DIETARY DOORS FOR NIGHT SHIFT (2 DOORS)
0215	0400	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS ALL ENTRANCES PORTICO'S AMBULANCE ENTRANCE HELIPAD LOADING DOCK CENTRAL PLANT COOLING TOWERS STAFF ENTRANCE DIETARY PATIO MOB EXTERIOR BUILDING EXTERIOR CODE 4 AT THIS TIME
0300		LOCKED CENTER DIETARY DOOR FOR THE EVENING (1 DOOR)
0405	0445	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47 ADMITTING TRIAGE 1 & 2 E/R CONSULTATION ROOM MAJOR TREATMENT ROOMS # 36 # 37 # 38 # 39 # 40 AND # 41 MEDIC STAFF ROOM FINANCE OFFICE SCHEDULING OFFICE CASE MANAGEMENT OFFICE LOSS CONTROL OFFICE MAIN LOBBY MAIN LOBBY ADMITTING STATIONS 1 THRU 5 CONCIERGE OFFICE
0410	0430	ESGORT PALM MORTUARY FROM THE LOADING DOCK TO ROOM BED # 602 TO PICK UP DECEASED PATIENT
0455	0530	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47 ADMITTING TRIAGE 1 & 2 E/R CONSULTATION ROOM MAJOR TREATMENT ROOMS # 36 # 37 # 38 # 39 # 40 AND # 41 MEDIC STAFF ROOM FINANCE OFFICE SCHEDULING OFFICE CASE MANAGEMENT OFFICE LOSS CONTROL OFFICE MAIN LOBBY MAIN LOBBY ADMITTING STATIONS 1 THRU 5 CONCIERGE OFFICE
0500		PBX RECEIVED TWO KEYS FOR THE DAY
0500		UNLOCKED MAIN ENTRANCE FOR THE DAY (2 DOORS)
0500		UNLOCKED TWO (2) EXTERIOR GLASS DOORS IN MOB HALLWAY (2 DOORS)
0505		UNLOCKED MOB HALLWAY ENTRANCE (1 DOOR)
0500		UNLOCKED ADMINISTRATIVE CONFERENCE ROOM FOR THE DAY (1 DOOR)
0505		UNLOCKED MOB HALLWAY ENTRANCE (1 DOOR)
0510		UNLOCKED MAIL ROOM FOR THE DAY (1 DOOR)
0515		UNLOCKED PACU FOR THE DAY (1 DOOR)
0520		UNLOCKED RECOVERY FOR THE DAY (1 DOOR)
0525		UNLOCKED SOCIAL WORKERS OFFICE ON THE 7 <sup>TH</sup> FLOOR (1 DOOR)
0525	0535	VALUABLE PICKUP PATIENT [REDACTED] PLACED ITEMS IN ENV. [REDACTED] ITEMS WERE PLACED IN SECURITY SAFE
0545	0700	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS ALL ENTRANCES PORTICO'S AMBULANCE ENTRANCE HELIPAD LOADING DOCK CENTRAL PLANT COOLING TOWERS STAFF ENTRANCE DIETARY PATIO MOB EXTERIOR BUILDING EXTERIOR CODE 4 AT THIS TIME
0630	0645	VALUABLE PICKUP PATIENT [REDACTED] PLACED ITEMS IN ENV. [REDACTED] ITEMS WERE PLACED IN SECURITY SAFE
0610	0635	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47 ADMITTING TRIAGE 1 & 2 E/R CONSULTATION ROOM MAJOR TREATMENT ROOMS # 36 # 37 # 38 # 39 # 40 AND # 41 MEDIC STAFF ROOM FINANCE OFFICE SCHEDULING OFFICE CASE MANAGEMENT OFFICE LOSS CONTROL OFFICE MAIN LOBBY MAIN LOBBY ADMITTING STATIONS 1 THRU 5 CONCIERGE OFFICE
0645		UNLOCKED IS OFFICE FOR KAREN FROM ILS
0700		S/O NICHOLS S/O LAMPTON AND S/O SUPERVISOR KING ON DUTY
	0730	S/O CORREO S/O CAMBERO AND S/O ENK OFF DUTY

SDAL001412

**End of Shift Activities Total**

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort = 2	Missing Property =
Assist = 1	Escort Off Property = 1	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock = 18	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 8	Valuable Pickup = 4
Disturbance = 1	Jump Start Vehicle =	Valuable Return =
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance = 1	Mob Patrol =	

SDAL001413

AA2413

# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05/16/08	1	NICHOLS	LAMPTON		KING
Start	End	Activity Performed			
0700		S/O LAMPTON, NICHOLS AND SUPERVISOR KING ON DUTY BRIEFED BY 3 <sup>RD</sup> SHIFT ON ALL SECURITY MATTERS. ALL KEYS AND RADIO TURNED OVER. (9) VALUABLE ENVELOPES IN SAFE AND (4) CONTRACTOR BADGES IN SAFE.			
	0730	SECURITY OFFICER POSTED IN THE ER.			
	0730	S/O CORRO, ENK AND CAMBERO OFF DUTY.			
0730	0745	VALUABLES RETURN TO PATIENT ( ) IN THE ER ROOM VALUABLES IN ENVELOPE ( )			
0730	0800	INTERIOR PATROL OF THE LOADING DOCK HALLWAY, BED STORAGE, CLINICAL ENGINEERING, CENTRAL PLANT, DATA ROOM, EYS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY LAB, MATERIALS MANAGEMENT, TV STORAGE, IT, CENTRAL STORAGE, DECANTAN, PHARMACY, PHARMACY DISTRIBUTION, MEDICAL RECORDS LAB, MEDICAL STAFF SERVICES, ELECTRICAL ROOM, INFORMATION SERVICES, HOUSEKEEPING, SURGERY ON CALL ROOMS ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD, FLUOROSCOPY, FILE ROOM, CATH LAB STORAGE, ECHO, EKG VIEWING ROOM, CATH LAB, MRI, SPECIAL PROCEDURES ONE & TWO, SOUTH IMAGING AREA, RADIOLOGY ONE & TWO, NUCLEAR MEDICINE ONE & TWO, HOT LAB, ULTRA SOUND ONE & TWO, STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK.			
0800	0845	INTERIOR PATROL. SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR WOMEN'S CENTER, LABOR AND DELIVERY, PUBLIC WAITING AREA, OIR, TRIAGE AREA, ALL NURSING STATIONS, PUBLIC RESTROOMS, PATIENT ROOMS #201-225, THE 3 <sup>RD</sup> , 4 <sup>TH</sup> , 5 <sup>TH</sup> , 6 <sup>TH</sup> , 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR AND 4 <sup>TH</sup> FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 601-635, 701-730, 801-835, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
0900		ASSAULT. SECURITY WAS CONTACTED BY THE CHARGE NURSE ON THE SEVENTH FLOOR CONCERNING PATIENT (CAGNINA) WHO STATED SHE WAS SEXUALLY ASSAULTED BY A NURSE ON THE SEVENTH FLOOR.			
0900	0945	EXTERIOR PATROL. SECURITY PERFORMED AN EXTERIOR PATROL, EIR, CIRCLE DRIVE, WEST EIR PARKING AREA, MAIN LOBBY, CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, EIR AMBULANCE BAY, NORTHWEST EIR PARKING AREA.			
1000	1045	INTERIOR PATROL OF THE MOB / CAFE HALLWAY, NORTH DIETARY ENTRANCE, PHYSICIAN DINNING, ELECTRICAL ROOM, EMPLOYEE MALE & FEMALE LOCKERS, EAST DIETARY ENTRANCE, EMPLOYEE ENTRANCE AND THE MAIL ROOM, LOADING DOCK HALLWAY, BED STORAGE, CLINICAL ENGINEERING, CENTRAL PLANT, DATA ROOM, EYS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY AND THE LOADING DOCK, MAIN HALLWAY W/ SERVICE ELEVATORS, INFORMATION SERVICES, HOUSEKEEPING, SURGERY ON CALL ROOMS ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD AND A WORK ROOM, EIR, ADMITTING / MAIN LOBBY, ADMITTING EIR, ADMITTING EIR, ADMITTING LOBBY, LOSS CONTROL, CASE MANAGEMENT, SCHEDULING, FINANCE, ELECTRICAL ROOM AND A STORAGE ROOM, MAIN LOBBY / ADMITTING, CONCIERGE, HELP DESK, PRE-ADMIT TESTING, DIAGNOSTIC IMAGING, OUTPATIENT SURGERY, OUTPATIENT WAITING AREA, GIFT SHOP, STAIRWELL #2 AND THE VISITORS ELEVATORS.			

SDAL001414



		AND A STORAGE ROOM MAIN LOBBY ADMITTING CONCERGE HELP DESK PRE-ADMIT TESTING DIAGNOSTIC IMAGING OUT PATIENT SURGERY OUT PATIENT WAITING AREA GIFT SHOP STAIRWELL 2 AND THE VISITORS ELEVATORS
0930	1015	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL EIR CIRCLE DRIVE WEST EIR PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA EIR AMBULANCE BAY NORTHWEST EIR PARKING AREA
1030	1060	INTERIOR PATROL OF THE NORTH AND SOUTH EIR AREA, NORTH EIR MAJOR TREATMENT ROOM #S 36-40 EMS WORKROOM AMBULANCE BAY EIR NURSES STATION PATIENT ROOM #S 30-40 SOUTH EIR PATIENT ROOM #S 1-23 SOUTH NURSES STATION TRIAGE ONE TWO & THREE AND THE CONSULTATION ROOM
1100	1145	HELICOPTER SECURITY SET UP FOR MERCY AIR TO DROP OFF ONE PATIENT TO THE EIR AREA
1115	1130	MISSING PATIENT DISTURBANCE ESCORT SECURITY WAS CALLED ON MISSING PATIENT [REDACTED] PATIENT WAS FOUND OUTSIDE THE MAIN ENTRANCE AND ESCORTED BACK TO HIS ROOM
1145	1230	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS #201-225 THE 3 <sup>RD</sup> 4 <sup>TH</sup> 5 <sup>TH</sup> 6 <sup>TH</sup> 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-835 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS
1230	1245	VALUABLES PICK UP FROM PATIENT [REDACTED] VALUABLES IN ENVELOPE [REDACTED]
1300	1345	INTERIOR PATROL OF THE MOB / CAFE HALLWAY NORTH DIETARY ENTRANCE PHYSICIAN DINNING ELECTRICAL ROOM EMPLOYEE MALE & FEMALE LOCKERS LEAS DIETARY ENTRANCE EMPLOYEE ENTRANCES AND THE MAIL ROOM LOADING DOCK HALLWAY BED STORAGE CLINICAL ENGINEERING GENERAL PLANT DATA ROOM EYS STORAGE MAINTENANCE CLEAN UTILITY MORGUE SOLID UTILITY AND THE LOADING DOCK MAIN HALLWAY W/ SERVICE ELEVATORS INFORMATION SERVICES HOUSEKEEPING SURGERY ON CALL ROOMS ONE & TWO OUT PATIENT SURGERY MALE & FEMALE LOCKERS DIAGNOSTIC IMAGING INPATIENT HOLD AND A WORKROOM EIR ADMITTING / MAIN LOBBY ADMITTING EIR ADMITTING EIR ADMITTING LOBBY LOSS CONTROL CASE MANAGEMENT SCHEDULING FINANCE ELECTRICAL ROOM AND A STORAGE ROOM MAIN LOBBY ADMITTING CONCERGE HELP DESK PRE-ADMIT TESTING DIAGNOSTIC IMAGING OUT PATIENT SURGERY OUT PATIENT WAITING AREA GIFT SHOP STAIRWELL 2 AND THE VISITORS ELEVATORS
1345	1430	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL EIR CIRCLE DRIVE WEST EIR PARKING AREA MAIN LOBBY CIRCLE DRIVE PRE-CONTROL ROOM SOUTHWEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA EIR AMBULANCE BAY NORTHWEST EIR PARKING AREA
1430	1445	EIR DISTURBANCE ESCORT SECURITY ASSISTED A NURSE IN THE EIR IN REMOVING A TV FROM A DISCHARGED PATIENT WHO LEFT THE EIR PATIENT WAS ESCORTED OFF PROPERTY
	1530	S/O LAMPTON, NICHOLS AND KING OFF DUTY

## End of Shift Activities Total

86 Off Property =	EIR Restraint =	Missing Patient = 1
Assault =	Escort = 2	Missing Property =
Assist =	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =

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1030	1115	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS #201-225 THE 3 <sup>RD</sup> 4 <sup>TH</sup> 5 <sup>TH</sup> 6 <sup>TH</sup> 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS
1130	1200	UNLOCKED DOOR SECURITY OPENED THE ADMITTING SUPERVISORS OFFICE FOR AN ADMITTING CLERK
1200	1245	EXTERIOR PATROL SECURITY PERFORMED AN EXTERIOR PATROL E/R CIRCLE DRIVE WEST E/R PARKING AREA MAIN LOBBY CIRCLE DRIVE FIRE CONTROL ROOM SOUTH WEST MAIN LOBBY PARKING MEDICAL OFFICE BUILDING WEST DOOR SOUTH VISITOR PARKING AREA EAST DOCTORS COVERED PARKING MEDICAL OFFICE BUILDING WEST LOBBY CAFE OUTSIDE SITTING AREA GENERATORS OXYGEN STORAGE LOADING DOCK MATERIALS MANAGEMENT DOCK AREA E/R AMBULANCE BAY NORTHWEST E/R PARKING AREA
1245	1300	VALUABLES PICK UP FROM PATIENT ( ) IN THE E/R ROOM VALUABLES IN ENVELOPE ( )
1300	1330	INTERIOR PATROL OF THE LOADING DOCK HALLWAY BED STORAGE CLINICAL ENGINEERING CENTRAL PLANT DATA ROOM SYS STORAGE MAINTENANCE CLEAN UTILITY MORGUE SOILED UTILITY LAB MATERIALS MANAGEMENT I.V. STORAGE CENTRAL STORAGE DECONTAM PHARMACY PHARMACY DISTRIBUTION MEDICAL RECORDS LAB MEDICAL STAFF SERVICES ELECTRICAL ROOM INFORMATION SERVICES HOUSEKEEPING SURGERY ON CALL ROOMS ONE & TWO OUT PATIENT SURGERY MALE & FEMALE LOCKERS DIAGNOSTIC IMAGING INPATIENT HOLD FLUOROSCOPY FILM ROOM GAIT LAB STORAGE ECHO EKS VIEWING ROOM CATH LAB MRU SPECIAL PROCEDURES ONE & TWO SOUTH IMAGING AREA RADIOLOGY ONE & TWO NUCLEAR MEDICINE ONE & TWO HOT LAB ULTRA SOUND ONE & TWO STORAGE ROOM W/ ROOF ACCESS AND THE LOADING DOCK
1330	1345	VALUABLES PICK UP FROM PATIENT ( ) IN THE E/R ROOM VALUABLES IN ENVELOPE ( )
1400	1445	INTERIOR PATROL SECURITY PERFORMED AN INTERIOR PATROL ON THE SECOND FLOOR WOMEN'S CENTER LABOR AND DELIVERY PUBLIC WAITING AREA O/R TRIAGE AREA ALL NURSING STATIONS PUBLIC RESTROOMS PATIENT ROOMS #201-225 THE 3 <sup>RD</sup> 4 <sup>TH</sup> 5 <sup>TH</sup> 6 <sup>TH</sup> 7 <sup>TH</sup> AND 8 <sup>TH</sup> FLOOR 3RD & 4 <sup>TH</sup> FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS
1530		S/O NICHOLS KING AND LAMPTON OFF DUTY

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault = 1	Escort =	Missing Property =
Assist =	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock = 1	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 8	Valuable Pickup = 2
Disturbance =	Jump Start Vehicle =	Valuable Return = 1
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance =	Mob Patrol =	

SDAL001416

AA2416



# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05/16/09	2 <sup>nd</sup>	CUNNINGHAM	ROSS	HAHN	
Start	End	Activity Performed			
1500		S/O HAHN, S/O ROSS, S/O CUNNINGHAM STEVE ON DUTY BRIEFED BY 1 <sup>st</sup> SHIFT ON ALL SECURITY MATTERS OF THE DAY. ALL RADIOS AND KEYS TURNED OVER TO 2 <sup>nd</sup> SHIFT. TWELVE (12) VALUABLES ENVELOPES WERE ACCOUNTED FOR.			
	1530	S/S KING AND S/O LAMPTON, AND S/O NICHOLS OFF DUTY.			
1500	2330	OFFICER HAHN IS STATIONED AT ER ALARM PANEL MONITORING STATION.			
1530	2330	OFFICER STEVE IS STATIONED AT ROOM 204.			
1530	1545	VALUABLES PICK-UP FROM PATIENT [REDACTED] IN ROOM [REDACTED] ENVELOPE [REDACTED]			
1610	1640	INTERIOR PATROL. SECURITY PERFORMED AN INTERIOR PATROL OF THE MOB BUILDING INCLUDING 2 <sup>nd</sup> , 3 <sup>rd</sup> , AND 4 <sup>th</sup> FLOORS.			
1640	1716	EXTERIOR PATROL. SECURITY PERFORMED AN EXTERIOR PATROL. ER CIRCLE DRIVE, WEST ER PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK MATERIALS MANAGEMENT DOCK AREA, ER AMBULANCE BAY, NORTHWEST ER PARKING AREA, MONITORED EMPLOYEE PARKING LOT.			
1730	1740	MISSING PROPERTY. SECURITY WAS CALLED TO ROOM 738 FOR A MISSING PROPERTY REPORT. SEE REPORT.			
1750	1800	SECURITY NOTE: SECURITY WAS CALLED TO THE WOMENS CENTER FOR ROOM 204. UPON ARRIVAL SECURITY NOTED THE DOOR TO THE ROOM WAS OPEN AND THE PATIENT WAS TALKING TO SOMEONE ON THE PHONE. THE PATIENT STATED "I JUST WANTED TO LET YOU KNOW WHAT HAPPENED TO ME, BECAUSE YOU WERE SO NICE IN COVERING THE AWARD MY SON RECEIVED FOR CALLING 911 WHEN I HAD A SEIZURE, I REALLY APPRECIATED THE NEWS MEDIA COVERAGE."			
1740	1810	INTERIOR PATROL OF THE 3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup> , 7 <sup>th</sup> , AND 8 <sup>th</sup> FLOOR. 3RD & 4 <sup>th</sup> FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 601-636, 701-736, 801-836, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			
1810	1815	VALUABLES RETURN TO PATIENT [REDACTED] IN ROOM [REDACTED] ENVELOPE [REDACTED]			
1815	1830	INTERIOR PATROL. SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR. FINANCIAL SERVICES, ADMINISTRATION, MARKETING, STATE TRAINING, HUMAN RESOURCES, NURSE STAFFING, ADMINISTRATION CONFERENCE CENTER, EMPLOYEE HEALTH SERVICES, PERFORMANCE IMPROVEMENT, INFECTION CONTROL, RISK MANAGEMENT, CONFERENCE ROOM ONE & TWO, EDUCATION, SOUTH RESTROOMS, STORAGE ROOM ONE & TWO AND THE HILLS CAFE.			
1830	1915	EXTERIOR PATROL. SECURITY PERFORMED AN EXTERIOR PATROL. ER CIRCLE DRIVE, WEST ER PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK MATERIALS MANAGEMENT DOCK AREA, ER AMBULANCE BAY, NORTHWEST ER PARKING AREA, MONITORED EMPLOYEE PARKING LOT.			
1830	1900	INTERIOR PATROL OF THE 3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup> , 7 <sup>th</sup> , AND 8 <sup>th</sup> FLOOR. 3RD & 4 <sup>th</sup> FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 601-636, 701-736, 801-836, PUBLIC			

SDAL001417

		RESTROOMS, PUBLIC WAITING AREAS AND ALL NURSES STATIONS
1945	1940	INTERIOR PATROL AND SECURED TWO (2) DOORS INTO MOB. SECURITY PERFORMED AN INTERIOR PATROL OF THE MOB BUILDING INCLUDING 1 <sup>ST</sup> , 2 <sup>ND</sup> , 3 <sup>RD</sup> AND 4 <sup>TH</sup> FLOORS.
1940	1945	LOCKED MOB SIDE ENTRANCES TWO (2) DOORS.
1945	1950	LOCKED FOUR (4) FOUR DOORS, LOCKED UP PACU.
1950		SECURITY NOTE: PBX OPERATOR STARTED RECEIVING TELEPHONE INQUIRIES FOR ROOM 204 (SEE INCIDENT LOG ITEM DAYSHIFT). THE PBX OPERATOR DID NOT ACKNOWLEDGE EXISTENCE OF PATIENT, AND DID NOT ROUTE ANY PHONE CALLS TO THE ROOM. AN INDIVIDUAL WHO IDENTIFIED HIMSELF AS [REDACTED] A REPORTER WITH CHANNEL 8 NEWS CALLED AND STATED TO PBX OPERATOR HE HAD OBTAINED PERMISSION FROM THE PATIENT IN ROOM 204 TO DO AN INTERVIEW. PBX OPERATOR PLACED [REDACTED] ON HOLD AND CONTACTED SHIRLEY THE HOUSE SUPERVISOR. SHIRLEY PROVIDED INSTRUCTIONS TO PBX TO ROUTE ALL INQUIRIES TO EXT 79705.
2015	2020	LOCKED FRONT ENTRANCE TWO (2) DOORS.
2020	2115	EXTERIOR PATROL: SECURITY PERFORMED AN EXTERIOR PATROL: E/R CIRCLE DRIVE WEST E/R PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, E/R AMBULANCE BAY, NORTHWEST E/R PARKING AREA, MONITORED EMPLOYEE PARKING LOT.
2130	2200	INTERIOR PATROL: SECURITY PERFORMED AN INTERIOR PATROL ON THE FIRST FLOOR FINANCIAL SERVICES, ADMINISTRATION, MARKETING, STAFF TRAINING, HUMAN RESOURCES, NURSE STAFFING, ADMINISTRATION CONFERENCE CENTER, EMPLOYEE HEALTH SERVICES, PERFORMANCE IMPROVEMENT, INFECTION CONTROL, RISK MANAGEMENT, CONFERENCE ROOM ONE & TWO, EDUCATION, SOUTH RESTROOMS, STORAGE ROOM ONE & TWO AND THE HILLS CAFE, 2 <sup>ND</sup> FLOOR WOMEN'S CENTER, LABOR AND DELIVERY, PUBLIC WAITING AREA, O/R TRIAGE AREA, ALL NURSING STATIONS, PUBLIC RESTROOMS, PATIENT ROOMS # 201-225.
2200	2220	EXTERIOR PATROL: SECURITY PERFORMED AN EXTERIOR PATROL: E/R CIRCLE DRIVE WEST E/R PARKING AREA, MAIN LOBBY CIRCLE DRIVE, FIRE CONTROL ROOM, SOUTHWEST MAIN LOBBY PARKING, MEDICAL OFFICE BUILDING WEST DOOR, SOUTH VISITOR PARKING AREA, EAST DOCTORS COVERED PARKING, MEDICAL OFFICE BUILDING WEST LOBBY, EMPLOYEE PARKING, CAFE OUTSIDE SITTING AREA, GENERATORS, OXYGEN STORAGE, LOADING DOCK, MATERIALS MANAGEMENT DOCK AREA, E/R AMBULANCE BAY, NORTHWEST E/R PARKING AREA, MONITORED EMPLOYEE PARKING LOT.
2200		SECURITY NOTE: S/S KING AND S/O NICHOLS ARRIVED TO ASSIST WITH CONTROL OF MEDIA.
2225	2315	INTERIOR PATROL OF THE LOADING DOCK, HALLWAY, BED STORAGE, CLINICAL ENGINEERING, CENTRAL PLANT, DATA ROOM, EYS STORAGE, MAINTENANCE, CLEAN UTILITY, MORGUE, SOILED UTILITY LAB, MATERIALS MANAGEMENT, JUV. STORAGE, CENTRAL STORAGE, DECONTAM, PHARMACY, PHARMACY DISTRIBUTION, MEDICAL RECORDS LAB, MEDICAL STAFF SERVICES, ELECTRICAL ROOM, INFORMATION SERVICES, HOUSEKEEPING, SURGERY ON CALL ROOMS ONE & TWO, OUTPATIENT SURGERY, MALE & FEMALE LOCKERS, DIAGNOSTIC IMAGING, INPATIENT HOLD, FLUOROSCOPY, FILE ROOM, ORTH LAB STORAGE, ECHO, EKG VIEWING ROOM, CATH LAB, MRI SPECIAL PROCEDURES ONE & TWO, SOUTH IMAGING AREA, RADIOLOGY ONE & TWO, NUCLEAR MEDICINE ONE & TWO, HOT LAB, ULTRA SOUND ONE & TWO, STORAGE ROOM, W/ROOF ACCESS AND THE LOADING DOCK.
2310	2315	VALUABLES RETURN TO PATIENT [REDACTED] IN [REDACTED] ENVELOPE [REDACTED]
2300		S/O CAMBERO, S/O MOTIS, S/O STROTHERS, S/O ENK ON DUTY.
	2330	S/O CUNNINGHAM, S/O HAHN, S/O STEVE, S/O ROSS OFF DUTY.

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =

SDAL001418

Assist =	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =		Towed Vehicle =
Damaged Property =	9	
Disturbance =	Jump Start Vehicle =	
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =		
E/R Disturbance =		

SDAL001419

AA2419



# Centennial Hills Hospital

## MEDICAL CENTER

### "SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
3/16/08	3 <sup>RD</sup>	ENK	GAMBERO	STROTHER & MOTIS	
Start	End	Activity Performed			
2300		S/O GAMBERO, S/O ENK, S/O STROTHER AND S/O MOTIS CHECKED ON DUTY BRIEFED ON THE EVENING ACTIVITY. ALL KEYS AND RADIO'S WERE TURNED OVER. (11) VALUABLES IN THE SAFE. (5) CONTRACTOR BADGES IN THE SAFE.			
2300	0700	SECURITY OFFICER STATIONED IN EIR BY ALARM PANEL			
2300	0700	SECURITY OFFICER STATIONED WITH VICTIM			
2330	2355	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47. ADMITTING TRIAGE 1 & 2. E/R CONSULTATION ROOM. MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41. MEDIC STAFF ROOM. FINANCE OFFICE. SCHEDULING OFFICE. CASE MANAGEMENT OFFICE. LOSS CONTROL OFFICE. MAIN LOBBY. MAIN LOBBY ADMITTING STATIONS 1 THRU 5. CONCIERGE OFFICE. MEDITATION ROOM. DIAGNOSTIC IMAGING CONSULTATION ROOM (1 <sup>ST</sup> FLOOR). PRE & POST PROCEDURE CARE UNITS. PRE & POST PROCEDURE WAITING AREAS. SURGERY. INPATIENT HOLDING ROOM. CATH LAB. CATH LAB CONTROL ROOM. SERVICE ELEVATORS. HOT LAB. ENDOSCOPY. CENTRAL STERILE MATERIALS MANAGEMENT. CENTRAL PLANT. EVS. MORGUE HOLDING. MAIL ROOM. CAFE. DIETARY. PHYSICIANS DINING. MEDICAL RECORDS. CLINICAL FILES. MAIN ELEVATORS. MAIN ENTRANCE. EXIT STAIRS (NORTH AND SOUTH). NURSE STAFFING OFFICE. MARKETING OFFICE. I.S. OFFICE. ADMINISTRATION OFFICES. 2 <sup>ND</sup> FLOOR WOMEN'S CENTER. MATERNITY. LABOR & DELIVERY. L & D WAITING AREA. ROOMS 201 TO 225. 5 <sup>TH</sup> FLOOR (IMC) ROOMS 501 TO 532. 6 <sup>TH</sup> FLOOR ROOMS 601 TO 636. 7 <sup>TH</sup> FLOOR ROOMS 701 TO 736. ALL RESTROOMS CHECKED. AND WAITING AREAS CHECKED. CODE 4 OFFICER ALSO MONITORED THE EIR ENTRANCE AND ASSISTED ADMITTING AS NEEDED.			
	2330	S/O CUNNINGHAM AND S/O HARN OFF DUTY			
0000		UNLOCKED TWO (3) MAIN DIETARY DOORS FOR NIGHT SHIFT. (3 DOORS)			
0040	0110	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47. ADMITTING TRIAGE 1 & 2. E/R CONSULTATION ROOM. MAJOR TREATMENT ROOMS # 36, # 37, # 38, # 39, # 40 AND # 41. MEDIC STAFF ROOM. FINANCE OFFICE. SCHEDULING OFFICE. CASE MANAGEMENT OFFICE. LOSS CONTROL OFFICE. MAIN LOBBY. MAIN LOBBY ADMITTING STATIONS 1 THRU 5. CONCIERGE OFFICE. MEDITATION ROOM. DIAGNOSTIC IMAGING CONSULTATION ROOM (1 <sup>ST</sup> FLOOR). PRE & POST PROCEDURE CARE UNITS. PRE & POST PROCEDURE WAITING AREAS. SURGERY. INPATIENT HOLDING ROOM. CATH LAB. CATH LAB CONTROL ROOM. SERVICE ELEVATORS. HOT LAB. ENDOSCOPY. CENTRAL STERILE MATERIALS MANAGEMENT. CENTRAL PLANT. EVS. MORGUE HOLDING. MAIL ROOM. CAFE. DIETARY. PHYSICIANS DINING. MEDICAL RECORDS. CLINICAL FILES. MAIN ELEVATORS. MAIN ENTRANCE. EXIT STAIRS (NORTH AND SOUTH). NURSE STAFFING OFFICE. MARKETING OFFICE. I.S. OFFICE. ADMINISTRATION OFFICES. 2 <sup>ND</sup> FLOOR WOMEN'S CENTER. MATERNITY. LABOR & DELIVERY. L & D WAITING AREA. ROOMS 201 TO 225. 5 <sup>TH</sup> FLOOR (IMC) ROOMS 501 TO 532. 6 <sup>TH</sup> FLOOR ROOMS 601 TO 636. 7 <sup>TH</sup> FLOOR ROOMS 701 TO 736. ALL RESTROOMS CHECKED. AND WAITING AREAS CHECKED. CODE 4 OFFICER ALSO MONITORED THE EIR ENTRANCE AND ASSISTED ADMITTING AS NEEDED.			
0115	0150	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS. ALL ENTRANCES. PORTICO'S AMBULANCE ENTRANCE. HELIPAD. LOADING DOCK. CENTRAL PLANT. COOLING TOWERS. STAFF ENTRANCE. DIETARY PATIO. MOB EXTERIOR. BUILDING EXTERIOR. CODE 4 AT THIS TIME.			
0100		RECEIVED TWO KEYS FROM PBX			
0120		NURSE ASSIST. ASSISTED NURSE WITH PICTURE OF PATIENT IN RM 704			

SDAL001420

0155	0220	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS #36, #37, #38, #39, #40 AND #41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE.
0200		LOCKED TWO (2) MAIN DIETARY DOORS FOR NIGHT SHIFT. (2 DOORS)
0225	0350	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR BUILDING. EXTERIOR CODE 4 AT THIS TIME.
0300		LOCKED CENTER DIETARY DOOR FOR THE EVENING. (1 DOOR)
0305	0335	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS #36, #37, #38, #39, #40 AND #41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE.
0355	0450	EXTERIOR PATROL WAS CONDUCTED OF OUTSIDE PARKING AREAS, ALL ENTRANCES, PORTICO'S, AMBULANCE ENTRANCE, HELIPAD, LOADING DOCK, CENTRAL PLANT, COOLING TOWERS, STAFF ENTRANCE, DIETARY PATIO, MOB EXTERIOR BUILDING. EXTERIOR CODE 4 AT THIS TIME.
0345	0430	INTERIOR PATROL WAS CONDUCTED OF EMERGENCY ROOMS 1 THRU 23 AND E/R ROOMS 30 THRU 47, ADMITTING, TRIAGE 1 & 2, E/R CONSULTATION ROOM, MAJOR TREATMENT ROOMS #36, #37, #38, #39, #40 AND #41, MEDIC STAFF ROOM, FINANCE OFFICE, SCHEDULING OFFICE, CASE MANAGEMENT OFFICE, LOSS CONTROL OFFICE, MAIN LOBBY, MAIN LOBBY ADMITTING STATIONS 1 THRU 5, CONCIERGE OFFICE.
0450		UNLOCKED (3) DOORS FOR THEO IN CATERIA. (3 DOORS)
0500		PBX RECEIVED TWO KEYS FOR THE DAY.
0500		UNLOCKED MAIN ENTRANCE FOR THE DAY. (2 DOORS)
0500		UNLOCKED TWO (2) EXTERIOR GLASS DOORS IN MOB HALLWAY. (2 DOORS)
0505		UNLOCKED MOB HALLWAY ENTRANCE. (1 DOOR)
0515		UNLOCKED PACU FOR THE DAY. (1 DOOR)
0520		UNLOCKED RECOVERY FOR THE DAY. (1 DOOR)
0700		S/O NICHOLS, S/O LAMPTON, S/O CUNNINGHAM AND S/O CAMBERG ON DUTY.
0730		S/O CAMBERG, S/O ENK, S/O MOTIS AND S/O STROTHER OFF DUTY.

## End of Shift Activities Total

86 Off Property =	E/R Restraint =	Missing Patient =
Assault =	Escort =	Missing Property =
Assist = 1	Escort Off Property =	Parking Violation =
Code Lift =	Forensic =	Robbery =
Code Pink =	Funds Escort =	Restraint =
Code Red =	Helicopter =	Stolen Vehicle =
Code Rush =	Hospital Lock/Unlock = 18	Towed Vehicle =
Damaged Property =	Interior/Exterior Patrol = 8	Valuable Pickup =
Disturbance =	Jump Start Vehicle =	Valuable Return =
Door/Panic Alarm =	Lost & Found =	Vandalism =
Drills =	Mob Lock/Unlock =	
E/R Disturbance =	Mob Patrol =	

SDAL001421

AA2421

**CASE NO. 70083**

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**IN THE  
SUPREME COURT OF NEVADA**

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**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.

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

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**APPELLANTS' APPENDIX TO OPENING BRIEF**

**VOLUME XII of XVII**

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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

JGILMORE@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

JBEMIS@HPSLAW.COM

*Attorneys for Appellants*

**APPENDIX TO APPELLANTS' OPENING BRIEF**

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Plaintiff's Exhibit 17 – Discovery Commissioner's Report and Recommendation filed September 4, 2013	XIV	68	AA2851-AA2856
Plaintiff's Exhibit 18 – Defendants Centennial Hills Hospital and Universal 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	I	6	AA0099-AA0112

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

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

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



TAB 45

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](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S SEVENTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS



OCT 27 2014

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 Seventh 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.

3. 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.

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

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 Jeunesse, 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.

...

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  
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.

12. 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

- 3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

- 10 15. Defendant reserves the right to supplement its list of witnesses.  
11 16. Defendant reserves the right to call any witnesses identified by any other parties  
12 in this litigation.

13 II.

14 DOCUMENTS

- 15 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
16 (Exhibit A on CD).  
17 2. Centennial Hills Hospital Daily Security Logs  
18 Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD).  
19 3. Records produced by Nevada State Board of Nursing  
20 (Exhibit C on CD).  
21 4. Centennial Hills Hospital Job Description for CNA  
22 Bates Numbered Unit Coord/C N A – 1 -8 (Exhibit D on attached CD).  
23 5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 –  
24 05/18/2008. Bates Numbered ASSIGN000001 – 000012  
25 (Exhibit E)  
26 6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 –  
27 05/18/2008. Bates Numbered ASSIGN000013 – 000023  
28 (Exhibit F)  
...  
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008.  
Bates Numbered ASSGIN000024 – 000035  
(Exhibit G)

- 1 8. Steven Dale Farmer Staffing Sheets.  
2 Bates Numbered STAFF000001 – 000003  
(Exhibit H)
- 3 9. Broadlane, Inc. Contract dated 08/12/2007  
4 Bates Numbered BROADLANE000001 – 000050  
(Exhibit I)
- 5 10. Privilege Log for Schedule of Steven Dale Farmer  
6 (Exhibit J)
- 7 11. Schedule of Steven Dale Farmer at Centennial Hills Hospital from  
8 April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321  
(Exhibit K)
- 9 12. Privilege Log for Schedule of Steven Dale Farmer  
10 (Exhibit L)
- 11 13. Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008  
12 bates labeled CHH00322 – CHH00325  
13 (Exhibit M)
- 14 14. Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer  
15 (Exhibit N)
- 16 15. Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled  
17 CHH00326 – CHH00365  
(Exhibit O)
- 18 16. Privilege Log for Agency Payroll Spreadsheets for February 2008,  
19 March 2008, April 2008 and May 2008  
(Exhibit P)
- 20 17. Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008,  
21 and May 2008 bates labeled CHH00366 – CHH00372  
22 (Exhibit Q)
- 23 18. Medical Records from Clark County Adult Mental Health bates labeled  
24 CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD)
- 25 19. Medical Records from Gary Chopra Gobinder, MD bates labeled Chop00001 –  
26 Chop00038 (Exhibit S attached hereto via CD)
- 27 20. Medical Records from MountainView Hospital bates labeled MVH00001 –  
28 MVH00159 (Exhibit T attached hereto via CD)

21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
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.**
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.**
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD)  
**CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.**
26. Defendant reserves the right to supplement this list of documents.
27. Defendant reserves the right to utilize any document utilized or identified by any

other party to this litigation.

DATED this 27<sup>th</sup> day of October, 2014.

HALL PRANGLE & SCHOONVELD, LLC


By: /s/: John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*



RECEIPT OF COPY

RECEIPT OF COPY of DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a  
CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S SEVENTH SUPPLEMENT  
TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND  
DOCUMENTS is hereby acknowledged on the following dates by the following parties:

DATED this 27 day of October, 2014. DATED this \_\_\_\_\_ day of October, 2014.



ROBERT E. MURDOCK, ESQ.  
521 South Third Street  
LAS VEGAS, NV 89101  
*Attorneys for Plaintiff*

S. BRENT VOGEL, ESQ.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-

DATED this \_\_\_\_\_ day of October, 2014. DATED this \_\_\_\_\_ day of October, 2014.

ROBERT C. MCBRIDE, ESQ.  
CARROLL, KELLY, TROTTER, FRANZEN,  
MCKENNA & PEABODY  
701 North Green Valley Parkway, Suite 200  
Henderson, Nevada 89074  
*Attorneys for Defendant*  
*Steven Dale Farmer*

JAMES P.C. SILVESTRI, ESQ.  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

4833-3895-2992, v. 1

TAB 46

**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](mailto:mprangle@hpslaw.com)  
[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)  
Attorneys for Defendant  
Valley Health System, LLC d/b/a  
Centennial Hills Hospital Medical Center

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S EIGHTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

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.

3. 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.

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

1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
8 Sacramento, CA 95899-7416

9 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  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).  
11 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number  
00199703, Nurse Assistant Certificate 00659300).

- 12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

26 The above identified physicians are expected to testify as to the care and treatment  
27 rendered as well as the facts and circumstances surrounding this matter.  
28 ...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

- 3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

- 10 15. Nida Canque  
11 (702) 301-0433  
12  
13 16. Asuncion Layug  
14 6628 MacDoogie Street  
15 Las Vegas, NV 89166  
16 Ph: (702) 405-7919  
17  
18 17. Alexe Brown-Gay  
19 5973 Spinnaker Point Avenue  
20 Las Vegas, NV 89110  
21 Ph: (702) 438-2860  
22  
23 18. Emma Cortez  
24 1835 Pallid Swift Court  
25 North Las Vegas, NV 89084  
26 Ph: (702) 292-8330  
27  
28 19. Maria Dakudo  
5201 Meadows Lily Avenue  
Las Vegas, NV 89108  
Ph: (702) 545-0938  
20  
21 20. Janette Luoang  
22 455 E. Twain Avenue, #144  
23 Las Vegas, NV 89169  
24 Ph: (213) 839-3915  
25  
26 21. Tiffiney Bills  
27 4230 Valley Regents Drive  
28 North Las Vegas, NV 89032  
Ph: (702) 443-4813

///

22. Deepa Abraham  
4515 N. Las Vegas Blvd., Bldg, 78 #1003  
Las Vegas, NV 89115  
Ph: (702) 643-6634
23. Cindy Parmalee, former Nursing Clinical Supervisor  
4516 Mohawk River Avenue  
North Las Vegas, NV 89031  
Ph: (702) 541-6630
24. Pierre  
7835 S. Rainbow Blvd. #1771  
Las Vegas, NV 89131  
Ph: (702) 897-0708
25. Salcedo  
8613 Dodds Canyon  
Las Vegas, NV 89131  
Ph: (702) 332-2423
26. Walker  
3829 Moonshine Falls Avenue  
North Las Vegas, NV 89085  
Ph: (702) 595-9205
27. Dechavez  
6913 Puetollano Drive  
North Las Vegas, NV 89084  
Ph: (702) 396-1784
28. Gayle  
Unknown Contact Information
29. Mosley  
15757 N 90<sup>th</sup> Place #1077  
Scottsdale, AZ 85260  
Ph: (314) 221-5914
30. Mosely P  
6765 Tulip Falls Drive, #2050  
Las Vegas, NV 89011  
Ph: (702) 418-2618

///

///



31. Schuele  
5277 Drifting Sands Court  
Las Vegas, NV 89149  
Ph: (503) 338-8864
32. Stringer  
5125 Costabella Lane  
Las Vegas, NV 89130  
Ph: (702) 459-9043
33. Wescott  
Unknown
34. Ramona Albunan, former Charge Nurse  
Ph: (702) 982-8767  
Ph: (440) 840-4740
35. Vicky Johnson, former Director of Nursing  
Ph: (702) 806-5208

The above-named individuals, Canque – Johnson (#15-35), are former 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 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. Defendant has provided the foregoing individuals' last known contact information, and has made efforts to verify the accuracy of such contact information to the best of its ability.

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

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

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

47. 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).
2. 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).
5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 --  
05/18/2008. Bates Numbered ASSIGN000001 -- 000012  
(Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 --  
05/18/2008. Bates Numbered ASSIGN000013 -- 000023  
(Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 -- 05/18/2008.  
Bates Numbered ASSGIN000024 -- 000035  
(Exhibit G)
8. Steven Dale Farmer Staffing Sheets.  
Bates Numbered STAFF000001 -- 000003  
(Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007  
Bates Numbered BROADLANE000001 -- 000050  
(Exhibit I)

10. Privilege Log for Schedule of Steven Dale Farmer  
(Exhibit J)
11. 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)
13. 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)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008,  
March 2008, April 2008 and May 2008  
(Exhibit P)
17. 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)
20. Medical Records from Mountain View Hospital bates labeled MVH00001 –  
MVH00159 (Exhibit T attached hereto via CD)
21. Medical Records from Southern Hills Hospital bates labeled Shills00001 –  
Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 –  
UMC00209 (Exhibit V attached hereto via CD)

///

///

- 1 23. Las Vegas Metropolitan Police Department's Criminal File of Steven Dale  
2 Farmer bates labeled LVMPD00001 – LVMPD0190 with Privilege Log.  
3 (Exhibit W attached hereto via CD)  
4 CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.  
5  
6 24. Las Vegas Metropolitan Police Department's Color Photos of Steven Dale Farmer  
7 bates labeled LVMPD0191 – LVMPD0196.  
8 (Exhibit X attached hereto via CD)  
9 CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.  
10  
11 25. Las Vegas Metropolitan Police Department's Audio File of 911 Call  
12 (Exhibit Y attached hereto via CD)  
13 CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.  
14  
15 26. Defendant reserves the right to supplement this list of documents.  
16  
17 27. Defendant reserves the right to utilize any document utilized or identified by any  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

other party to this litigation.

DATED this 22<sup>nd</sup> day of April, 2015

HALL PRANGLE & SCHOONVELD, LLC

By: /s/: Brigitte E. Foley, NV Bar No. 12965 for:  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
Attorneys for Defendant  
Valley Health System, LLC d/b/a  
Centennial Hills Hospital Medical Center

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 22<sup>nd</sup> day of April, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S EIGHTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
Attorneys for Defendant  
American Nursing Services, Inc.

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
Attorneys for Defendant  
Steven Dale Farmer Attorneys for  
Defendant  
Steven Dale Farmer

/s/; Brigitte E. Foley  
An employee of HALL PRANGLE & SCHOONVELD, LLC

**TAB 47**

**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](mailto:mprangle@hpslaw.com)  
[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

CASE NO. A595780  
DEPT NO. II

Plaintiff,

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 CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S NINTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

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

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.

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  
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



1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
8 Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
9 and investigation performed by the California Board of Nursing prior to CNA certification. The  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 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).

- 12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

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

28 ...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

- 3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

- 10 15. Nida Canque  
11 (702) 301-0433  
12  
13 16. Asuncion Layug  
14 6628 MacDoogie Street  
15 Las Vegas, NV 89166  
16 Ph: (702) 405-7919  
17  
18 17. Alexe Brown-Gay  
19 5973 Spinnaker Point Avenue  
20 Las Vegas, NV 89110  
21 Ph: (702) 438-2860  
22  
23 18. Emma Cortez  
24 1835 Pallid Swift Court  
25 North Las Vegas, NV 89084  
26 Ph: (702) 292-8330  
27  
28 19. Maria Dakudo  
5201 Meadows Lily Avenue  
Las Vegas, NV 89108  
Ph: (702) 545-0938  
20  
21 20. Janette Luoang  
22 455 E. Twain Avenue, #144  
23 Las Vegas, NV 89169  
24 Ph: (213) 839-3915  
25  
26 21. Tiffiney Bills  
27 4230 Valley Regents Drive  
28 North Las Vegas, NV 89032

///

22. Deepa Abraham  
4515 N. Las Vegas Blvd., Bldg. 78; #1003  
Las Vegas, NV 89115  
Ph: (702) 643-6634
23. Cindy Parmalee, former Nursing Clinical Supervisor  
4516 Mohawk River Avenue  
North Las Vegas, NV 89031  
Ph: (702) 541-6630
24. Pierre  
7835 S. Rainbow Blvd., #1771  
Las Vegas, NV 89131  
Ph: (702) 897-0708
25. Salcedo  
8613 Dodds Canyon  
Las Vegas, NV 89131  
Ph: (702) 332-2423
26. Walker  
3829 Moonshine Falls Avenue  
North Las Vegas, NV 89085  
Ph: (702) 595-9205
27. Dechavez  
6913 Puetollano Drive  
North Las Vegas, NV 89084  
Ph: (702) 396-1784
28. Gayle  
Unknown Contact Information
29. Mosley  
15757 N 90<sup>th</sup> Place #1077  
Scottsdale, AZ 85260  
Ph: (314) 221-5914
30. Mosley, P  
6765 Tulip Falls Drive, #2050  
Las Vegas, NV 89011  
Ph: (702) 418-2618

///

///

- 1 31. Schuele  
2 5277 Drifting Sands Court  
3 Las Vegas, NV 89149  
4 Ph: (503) 338-8864
- 5 32. Stringer  
6 5125 Costabella Lane  
7 Las Vegas, NV 89130  
8 Ph: (702) 459-9043
- 9 33. Wescott  
10 Unknown
- 11 34. Ramona Albunan, former Charge Nurse  
12 Ph: (702) 982-8767  
13 Ph: (440) 840-4740
- 14 35. Vicky Johnson, former Director of Nursing  
15 Ph: (702) 806-5208

16 The above-named individuals, Canque – Johnson (#15-35), are former employees of  
17 Defendant, Valley Health System, LLC, and have been identified by Defendant as having  
18 worked with Defendant Steven Farmer and Christine Murray, RN on the same shift and/or floor  
19 in February and/or March of 2008, and may have knowledge and information about the alleged  
20 incident with the elderly patient to which Nurse Murray referred in her deposition testify.  
21 Defendant has provided the foregoing individuals' last known contact information, and has made  
22 efforts to verify the accuracy of such contact information to the best of its ability.

- 23 36. Lilibeth Parejas, RN
- 24 37. Bernadine Rebogio, RN
- 25 38. Janice Collado, RN
- 26 39. Darlene Infante Carbonell, RN
- 27 40. Maria Dacquell, CNA
- 28 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

27 The above-named individuals, Parejas – Cronister (#36-45), are current employees of  
28 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

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

47. 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).
2. 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).
5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)

**HALL PRANGLE & SCHOONVELD, LLC**

1160 NORTH TOWN CENTER DRIVE

SUITE 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702-389-6400 FACSIMILE: 702-384-6025

11. 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)
  13. 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)
  16. Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)
  17. 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)
  20. Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD)
  21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
  22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
  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.

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.
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call  
(Exhibit Y attached hereto via CD)  
CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
26. **Policy and Procedure – Domestic Violence (or Spousal Abuse)**  
(Exhibit Z attached hereto bates labeled P&P0001 - 0005)
27. **Policy and Procedure – Abuse/Neglect of Neonates/Children**  
(Exhibit AA attached hereto bates labeled P&P0006 – 0010)
28. **Policy and Procedure – Abuse/Neglect of the Elderly**  
(Exhibit BB attached hereto bates labeled P&P0011 – 0013)
29. Defendant reserves the right to supplement this list of documents.
30. Defendant reserves the right to utilize any document utilized or identified by any  
other party to this litigation.

DATED this 10<sup>th</sup> day of June, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/: John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 10<sup>th</sup> day of June, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S NINTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4828-2348-7524, v. 1

**TAB 48**

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](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S TENTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

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  
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(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

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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  
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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  
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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  
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  
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2 Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing  
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- 3 5. Michael Egstad, Manager I  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
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10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).  
Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number  
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- 12 6. Collado Jeunesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

26 The above identified physicians are expected to testify as to the care and treatment  
27 rendered as well as the facts and circumstances surrounding this matter.  
28 ...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

10 15. Nida Ibasco Canque, RN  
11 7940 Quail Breast Lane  
12 Las Vegas, NV 89131  
13 *(This is last known address)*

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

17 16. Asuncion Layug, RN  
18 8920 Rendon Street  
19 Las Vegas, NV 89143  
20 *(This is last known address)*

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

24 17. Alxenia Priscilla Brown-Gay, RN  
25 5973 Spinnaker Point Avenue  
26 Las Vegas, NV 89110  
27 *(This is last known address)*

28 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.

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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.



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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.

- 1           28.    Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle  
2                3937 Sierra Sun Street  
3                North Las Vegas, NV 89032  
              *(This is last known address)*

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

- 7           29.    Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN  
8                224 Algiers Drive  
9                Venice, FL 34293  
              *(This is last known address)*

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

- 13          30.    Paula L. Mosley, RN  
14                5880 Boulder Falls Street  
15                Henderson, NV 89011  
              *(This is last known address)*

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

- 19          31.    Amy Dee Schuele, RN  
20                5277 Drifting Sands Court  
21                Las Vegas, NV 89149  
22                *(This is last known address)*

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

- 26          32.    Victoria Stringer, RN  
27                2208 Frostproof Street  
28                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.

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

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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.

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

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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.

- 24  
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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

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

3 46. Carol Butler  
4 9079 William Cody Dr.  
5 Evergreen, CO 80439

6 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time  
7 of the events surrounding the instant litigation.

8 47. Amy Blasing, formerly Amy Bochenek  
9 9521 San Mateo Blvd. NE  
10 Albuquerque, NM 87113

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

13 48. Darby Curly  
14 4021 Cherokee Rose Ave  
15 N Las Vegas, NV 89031

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

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

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

## 21 II.

### 22 DOCUMENTS

- 23 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
24 (Exhibit A on CD).
- 25 2. Centennial Hills Hospital Daily Security Logs  
26 Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD).
- 27 3. Records produced by Nevada State Board of Nursing  
28 (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).

5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)
11. 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)
13. 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)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)

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17. 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)
20. Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD)
21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
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.
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.
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD)  
CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
26. Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005)
27. Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010)
28. Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013)
29. **Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC).**

30. Defendant reserves the right to supplement this list of documents.

31. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation.

DATED this 16<sup>th</sup> day of June, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/: John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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

**CERTIFICATE OF SERVICE**

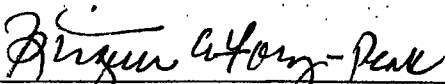
I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 16<sup>th</sup> day of June, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S TENTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4841-6653-5205, v. 1



TAB 49

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

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](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S ELEVENTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

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.

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  
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

1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
9 and investigation performed by the California Board of Nursing prior to CNA certification. The  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 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).

- 12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

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

28 ...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

10 15. Nida Ibasco Canque, RN  
11 7940 Quail Breast Lane  
12 Las Vegas, NV 89131  
13 *(This is last known address)*

14 Nurse Canque was a night-shift nurse during the time period of February through June  
15 2008, and therefore, may have knowledge and information about the facts and circumstances  
16 surrounding this matter.

17 16. Asuncion Layug, RN  
18 8920 Rendon Street  
19 Las Vegas, NV 89143  
20 *(This is last known address)*

21 Nurse Layug was a night-shift nurse during the time period of February through June  
22 2008, and therefore, may have knowledge and information about the facts and circumstances  
23 surrounding this matter.

24 17. Alxenia Priscilla Brown-Gay, RN  
25 5973 Spinnaker Point Avenue  
26 Las Vegas, NV 89110  
27 *(This is last known address)*

28 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.

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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.

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.



- 1           28.    Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle  
2                3937 Sierra Sun Street  
3                North Las Vegas, NV 89032  
              *(This is last known address)*

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

- 7           29.    Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN  
8                224 Algiers Drive  
9                Venice, FL 34293  
              *(This is last known address)*

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

- 13          30.    Paula L. Mosley, RN  
14                5880 Boulder Falls Street  
15                Henderson, NV 89011  
              *(This is last known address)*

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

- 19          31.    Amy Dee Schuele, RN  
20                5277 Drifting Sands Court  
21                Las Vegas, NV 89149  
              *(This is last known address)*

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

- 25          32.    Victoria Stringer, RN  
26                2208 Frostproof Street  
27                Las Vegas, NV 89128  
              *(This is last known address)*

28          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.

- 1 33. Lorraine F. Wescott, RN  
2 8888 Sparkling Creek Avenue  
3 Las Vegas, NV 89143  
4 *(This is last known address)*

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

- 8 34. Ma Ramona Ticao Albunan  
9 10 Forest Grove Drive, #21  
10 Daly City, CA 94015  
11 *(This is last known address)*

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

- 15 35. Vickie A. Johnson, RN  
16 9129 Amber Waves Street  
17 Las Vegas, NV 89123  
18 *(This is last known address)*

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

- 22 36. Lilibeth Parejas, RN  
23 37. Bernadine Rebogio, RN  
24 38. Janice Collado, RN  
25 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

26 The above-named individuals, Parejas - Cronister (#36-45), are current employees of  
27 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

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

3 46. Carol Butler  
4 9079 William Cody Dr.  
5 Evergreen, CO 80439

6 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the  
7 events surrounding the instant litigation.

8 47. Amy Blasing, formerly Amy Bochenek  
9 9521 San Mateo Blvd. NE  
10 Albuquerque, NM 87113

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

13 48. Darby Curly  
14 4021 Cherokee Rose Ave  
15 N Las Vegas, NV 89031

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

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

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

## 21 II.

### 22 DOCUMENTS

- 23 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
24 (Exhibit A on CD).
- 25 2. Centennial Hills Hospital Daily Security Logs  
26 Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD).
- 27 3. Records produced by Nevada State Board of Nursing  
28 (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).

5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)
11. 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)
13. 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)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)

///  
///

17. 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)
20. Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD)
21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
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.
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.
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD)  
CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
26. Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005)
27. Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010)
28. Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013)
29. Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC)

///

30. Centennial Hills Hospital Managerial Hierarchy Chart  
(Exhibit DD attached hereto and bates labeled CHH00373)
31. Job Description – RN I  
(Exhibit EE attached hereto and bates labeled CHH00374 – 00380)
32. Job Description – RN III  
(Exhibit FF attached hereto and bates labeled CHH00381 – 00387)
33. Job Description – Unit Coordinator/ED Tech  
(Exhibit GG attached hereto and bates labeled CHH00388 – 00395)
34. Defendant reserves the right to supplement this list of documents.
35. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation.

DATED this 17<sup>th</sup> day of June, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/ John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 17<sup>th</sup> day of June, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S ELEVENTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4847-7549-8533, v. 1

TAB 50



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

**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](mailto:mprangle@hpslaw.com)  
[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S TWELFTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

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.

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  
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

1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
9 and investigation performed by the California Board of Nursing prior to CNA certification. The  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 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).

- 12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

26 The above identified physicians are expected to testify as to the care and treatment  
27 rendered as well as the facts and circumstances surrounding this matter.  
28 ...

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  
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.

12. 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

1 Ms. Simmons is expected to testify as to the facts and circumstances surrounding this  
2 matter.

3 14. Salvatore Sparacino  
4 c/o John F. Bemis, Esq.  
5 HALL PRANGLE & SCHOONVELD, LLC  
6 1160 North Town Center Drive, Suite 200  
7 Las Vegas, NV 89144

8 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this  
9 matter.

10 15. Nida Ibasco Canque, RN  
11 7940 Quail Breast Lane  
12 Las Vegas, NV 89131  
13 *(This is last known address)*

14 Nurse Canque was a night-shift nurse during the time period of February through June  
15 2008, and therefore, may have knowledge and information about the facts and circumstances  
16 surrounding this matter.

17 16. Asuncion Layug, RN  
18 8920 Rendon Street  
19 Las Vegas, NV 89143  
20 *(This is last known address)*

21 Nurse Layug was a night-shift nurse during the time period of February through June  
22 2008, and therefore, may have knowledge and information about the facts and circumstances  
23 surrounding this matter.

24 17. Alxenia Priscilla Brown-Gay, RN  
25 5973 Spinnaker Point Avenue  
26 Las Vegas, NV 89110  
27 *(This is last known address)*

28 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.

///

///

///

///

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. 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 surrounding this matter.

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.

- 1           28.    Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle  
2                    3937 Sierra Sun Street  
3                    North Las Vegas, NV 89032  
                  *(This is last known address)*

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

- 7           29.    Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN  
8                    224 Algiers Drive  
9                    Venice, FL 34293  
                  *(This is last known address)*

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

- 13          30.    Paula L. Mosley, RN  
14                   5880 Boulder Falls Street  
                  Henderson, NV 89011  
                  *(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  
17 information about the facts and circumstances surrounding this matter.

- 18          31.    Amy Dee Schuele, RN  
19                   5277 Drifting Sands Court  
                  Las Vegas, NV 89149  
                  *(This is last known address)*

20          Nurse Schuele was a RN who sometimes worked double shifts (from day to night) during  
21 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  
25                   Las Vegas, NV 89128  
                  *(This is last known address)*

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



- 1 33. Lorraine F. Wescott, RN  
2 8888 Sparkling Creek Avenue  
3 Las Vegas, NV 89143  
4 *(This is last known address)*

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

- 8 34. Ma Ramona Ticao Albunan  
9 10 Forest Grove Drive, #21  
10 Daly City, CA 94015  
11 *(This is last known address)*

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

- 15 35. Vickie A. Johnson, RN  
16 9129 Amber Waves Street  
17 Las Vegas, NV 89123  
18 *(This is last known address)*

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

- 22 36. Lilibeth Parejas, RN  
23 37. Bernadine Rebogio, RN  
24 38. Janice Collado, RN  
25 39. Darlene Infante Carbonell, RN  
26 40. Maria Dacquell, CNA  
27 41. Rhona Lopez  
28 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

26 The above-named individuals, Parejas - Cronister (#36-45), are current employees of  
27 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

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

3 46. Carol Butler  
4 9079 William Cody Dr.  
5 Evergreen, CO 80439

6 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the  
7 events surrounding the instant litigation.

8 47. Amy Blasing, formerly Amy Bochenek  
9 9521 San Mateo Blvd. NE  
10 Albuquerque, NM 87113

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

13 48. Darby Curly  
14 4021 Cherokee Rose Ave  
15 N Las Vegas, NV 89031

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

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

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

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### 22 DOCUMENTS

23 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
24 (Exhibit A on CD).

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26 Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD).

27 3. Records produced by Nevada State Board of Nursing  
28 (Exhibit C on CD).

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Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD).

- 1 5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 –  
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- 3 6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 –  
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- 7 8. Steven Dale Farmer Staffing Sheets.  
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- 11 10. Privilege Log for Schedule of Steven Dale Farmer  
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13 April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321  
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- 18 15. Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled  
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21 March 2008, April 2008 and May 2008  
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21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
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.
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.
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD)  
CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
26. Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005)
27. Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010)
28. Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013)
29. Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC)

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

25 ///

26 ///

27 ///

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

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 other party to this litigation.

DATED this 10<sup>th</sup> day of July, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/: John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 10<sup>th</sup> day of July, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S TWELFTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

/s/: Audrey Ann Stephanski  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4848-8565-1749, v. 1

TAB 51



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

**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](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

ELECTRONICALLY SERVED

07/13/2015 04:11:48 PM

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780

DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S THIRTEENTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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 Thirteenth 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.

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  
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

1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
9 and investigation performed by the California Board of Nursing prior to CNA certification. The  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 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).

12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

26 The above identified physicians are expected to testify as to the care and treatment  
27 rendered as well as the facts and circumstances surrounding this matter.  
28 ...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

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  
7940 Quail Breast Lane  
Las Vegas, NV 89131  
(This is last known address)

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.

16. Asuncion Layug, RN  
8920 Rendon Street  
Las Vegas, NV 89143  
(This is last known address)

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.

17. Alxenia Priscilla Brown-Gay, RN  
5973 Spinnaker Point Avenue  
Las Vegas, NV 89110  
(This is last known address)

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.

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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. 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. Tiffney 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.

- 1 23. Cindy L. Parmelee  
2 4516 Mohawk River Avenue  
3 North Las Vegas, NV 89031  
4 *(This is last known address)*

5 Ms. Parmelee was a night-shift RN during the time period of February through June  
6 2008, and therefore, may have knowledge and information about the facts and circumstances  
7 surrounding this matter.

- 8 24. Marie Bayrotie Pierre, RN  
9 8914 Bonneville Peak Court  
10 Las Vegas, NV 89148  
11 *(This is last known address)*

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

- 15 25. Ana Maria P. Salcedo, RN  
16 3832 Kettle Falls Avenue  
17 North Las Vegas, NV 89085  
18 *(This is last known address)*

19 Nurse Salcedo was a RN who sometimes worked double shifts (from day to night) during  
20 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 26. Charlene Walker-Lexing,  
23 3829 Moonshine Falls Avenue  
24 North Las Vegas, NV 89085  
25 *(This is last known address)*

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

- 29 27. Virginia D. De Chavez  
30 12338 Holly Jane Court  
31 Orlando, FL 32824  
32 *(This is last known address)*

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

- 1 28. Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle  
2 3937 Sierra Sun Street  
3 North Las Vegas, NV 89032  
4 *(This is last known address)*

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

- 8 29. Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN  
9 224 Algiers Drive  
10 Venice, FL 34293  
11 *(This is last known address)*

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

- 15 30. Paula L. Mosley, RN  
16 5880 Boulder Falls Street  
17 Henderson, NV 89011  
18 *(This is last known address)*

19 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during  
20 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 31. Amy Dee Schuele, RN  
23 5277 Drifting Sands Court  
24 Las Vegas, NV 89149  
25 *(This is last known address)*

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

32. Victoria Stringer, RN  
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.

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  
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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

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

3 46. Carol Butler  
4 9079 William Cody Dr.  
5 Evergreen, CO 80439

6 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the  
7 events surrounding the instant litigation.

8 47. Amy Blasing, formerly Amy Bochenek  
9 9521 San Mateo Blvd. NE  
10 Albuquerque, NM 87113

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

13 48. Darby Curly  
14 4021 Cherokee Rose Ave  
15 N Las Vegas, NV 89031

16 Mr. Curly is a former charge nurse in the Emergency Department at the time of the  
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CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER.
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.
25. Las Vegas Metropolitan Police Department's Audio File of 911 Call (Exhibit Y attached hereto via CD)  
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26. Policy and Procedure – Domestic Violence (or Spousal Abuse) (Exhibit Z attached hereto bates labeled P&P0001 - 0005)
27. Policy and Procedure – Abuse/Neglect of Neonates/Children (Exhibit AA attached hereto bates labeled P&P0006 – 0010)
28. Policy and Procedure – Abuse/Neglect of the Elderly (Exhibit BB attached hereto bates labeled P&P0011 – 0013)
29. Privilege Log regarding Patient Safety Committee Minutes and Documentation from June, July, August and September of 2008. (Exhibit CC)

///

30. Centennial Hills Hospital Managerial Hierarchy Chart  
(Exhibit DD attached hereto and bates labeled CHH00373)
31. Job Description – RN I  
(Exhibit EE attached hereto and bates labeled CHH00374 – 00380)
32. Job Description – RN III  
(Exhibit FF attached hereto and bates labeled CHH00381 – 00387)
33. Job Description – Unit Coordinator/ED Tech  
(Exhibit GG attached hereto and bates labeled CHH00388 – 00395)
34. Policy and Procedure – Chain of Command  
(Exhibit HH attached hereto and bates labeled P&P0014-0017)
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36. Patient Relations Log  
(Exhibit JJ attached hereto and bates labeled PtRelations0001-0009)
37. Privilege Log Regarding Risk Events from February, March,  
April and May, 2008 (Exhibit KK attached hereto)
38. Risk Events  
(Exhibit LL attached hereto and bates labeled RiskEvents0001-0026)
39. Privilege Log Regarding Grievance Log (Exhibit MM attached hereto)
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41. Bureau of Health Care Quality and Compliance for Centennial Hills  
Hospital Medical Center (Exhibit OO attached hereto and bates  
Labeled BHCQ0001-0038)
42. Privilege Log Regarding Incident Report (Exhibit PP attached hereto)
43. Centennial Hills Hospital Incident Report  
(Exhibit QQ attached hereto and bates labeled  
CHH Incident Report00001-00005)

///

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

44. Defendant reserves the right to supplement this list of documents.

45. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation.

DATED this 13<sup>th</sup> day of July, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/: John Bemis  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 13<sup>th</sup> day of July, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S THIRTEENTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113  
*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

/s/ Audrey Ann Stephanski  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4833-0748-1637, v. 1

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

**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](mailto:mprangle@hpslaw.com)  
[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

MISTY PETERSON, AS SPECIAL  
ADMINISTRATOR OF THE ESTATE OF  
JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S FOURTEENTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**



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

7 I.

8 WITNESSES

- 9 1. Jane Doe  
10 c/o Robert E. Murdock, Esq.  
11 MURDOCK & ASSOCIATES, CHTD.  
12 521 South Third Street  
13 Las Vegas, Nevada 89101

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

- 16 2. Jane Doe's two sons

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

- 20 3. Steven Dale Farmer  
21 c/o Robert C. McBride, Esq.  
22 CARROLL, KELLY, TROTTER, FRANZEN, MCKENNA & PEABODY  
23 701 North Green Valley Parkway, Suite 200  
24 Henderson, Nevada 89074

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

- 27 4. Debra Scott, MSN, RN, FRE  
28 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

1 Certification Process for a Certified Nurses Assistant. Revocation of Steven Dale Farmer's CNA  
2 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  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
1615 Capitol Avenue  
8 Sacramento, CA 95899-7416

8 Mr. Egstad is expected to testify regarding The certification process, background check  
9 and investigation performed by the California Board of Nursing prior to CNA certification. The  
10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
11 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).

- 12 6. Collado Jeunnesse, RN  
13 Kim Moon, RN  
14 Abraham Deppa, CNA  
15 Nikki Carter, CNA  
16 Marina McDowell, CNA  
17 Alana Schons, CNA  
18 Nelina Arante, RN  
19 Ronald Lodevico  
20 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  
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.  
25 James E. Mock, M.D.

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

28 ...  
...

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this matter.

- 27 12. Matthew Ross  
28 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.

13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

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  
7940 Quail Breast Lane  
Las Vegas, NV 89131  
(This is last known address)

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.

16. Asuncion Layug, RN  
8920 Rendon Street  
Las Vegas, NV 89143  
(This is last known address)

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.

17. Alxenia Priscilla Brown-Gay, RN  
5973 Spinnaker Point Avenue  
Las Vegas, NV 89110  
(This is last known address)

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.

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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. 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 surrounding this matter.

- 1           23.   Cindy L. Parmelee  
2               4516 Mohawk River Avenue  
3               North Las Vegas, NV 89031  
              *(This is last known address)*

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

- 6           24.   Marie Bayrotie Pierre, RN  
7               8914 Bonneville Peak Court  
8               Las Vegas, NV 89148  
              *(This is last known address)*

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

- 11           25.   Ana Maria P. Salcedo, RN  
12               3832 Kettle Falls Avenue  
13               North Las Vegas, NV 89085  
              *(This is last known address)*

14           Nurse Salcedo 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           26.   Charlene Walker-Lexing,  
18               3829 Moonshine Falls Avenue  
19               North Las Vegas, NV 89085  
              *(This is last known address)*

20           Ms. Walker-Lexing was a LPN who sometimes worked double shifts (from day to night)  
21           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           27.   Virginia D. De Chavez  
23               12338 Holly Jane Court  
24               Orlando, FL 32824  
              *(This is last known address)*

25           De Chavez was an 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.

- 1 28. Maria Amoy Hutchinson, CNA a.k.a. Maria Gayle  
2 3937 Sierra Sun Street  
3 North Las Vegas, NV 89032  
4 *(This is last known address)*

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

- 8 29. Carol A. Mosley, RN a.k.a. Carol A. Broughton, RN  
9 224 Algiers Drive  
10 Venice, FL 34293  
11 *(This is last known address)*

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

- 15 30. Paula L. Mosley, RN  
16 5880 Boulder Falls Street  
17 Henderson, NV 89011  
18 *(This is last known address)*

19 Nurse Mosley was a RN who sometimes worked double shifts (from day to night) during  
20 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 31. Amy Dee Schuele, RN  
23 5277 Drifting Sands Court  
24 Las Vegas, NV 89149  
25 *(This is last known address)*

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

32. Victoria Stringer, RN  
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.



- 1 33. Lorraine F. Wescott, RN  
2 8888 Sparkling Creek Avenue  
3 Las Vegas, NV 89143  
4 *(This is last known address)*

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

- 8 34. Ma Ramona Ticao Alunan  
9 10 Forest Grove Drive, #21  
10 Daly City, CA 94015  
11 *(This is last known address)*

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

- 15 35. Vickie A. Johnson, RN  
16 9129 Amber Waves Street  
17 Las Vegas, NV 89123  
18 *(This is last known address)*

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

- 22 36. Lilibeth Parejas, RN  
23 37. Bernadine Rebogio, RN  
24 38. Janice Collado, RN  
25 39. Darlene Infante Carbonell, RN  
26 40. Maria Dacquell, CNA  
27 41. Rhona Lopez  
28 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

26 The above-named individuals, Parejas – Cronister (#36-45), are current employees of  
27 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

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

3 46. Carol Butler  
4 9079 William Cody Dr.  
5 Evergreen, CO 80439

6 Ms. Butler is the former Chief Nursing Officer at Centennial Hills during the time of the  
7 events surrounding the instant litigation.

8 47. Amy Blasing, formerly Amy Bochenek  
9 9521 San Mateo Blvd. NE  
10 Albuquerque, NM 87113

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

13 48. Darby Curly  
14 4021 Cherokee Rose Ave  
15 N Las Vegas, NV 89031

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

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

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

## 21 II.

### 22 DOCUMENTS

23 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
24 (Exhibit A on CD).

25 2. Centennial Hills Hospital Daily Security Logs  
26 Bates Numbered SDAL 000001 - 001421 (Exhibit B on CD).

27 3. Records produced by Nevada State Board of Nursing  
28 (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).

5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets. Bates Numbered STAFF000001 – 000003 (Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007 Bates Numbered BROADLANE000001 – 000050 (Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer (Exhibit J)
11. 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)
13. 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)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008, March 2008, April 2008 and May 2008 (Exhibit P)

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17. 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)
20. Medical Records from Mountain View Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD)
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42. Privilege Log Regarding Incident Report (Exhibit PP attached hereto)
43. Centennial Hills Hospital Incident Report  
(Exhibit QQ attached hereto and bates labeled  
CHH Incident Report00001-00005)
44. 2009 Patient Safety Fair Documents  
(Exhibit RR attached hereto and bates labeled 09PTSFTY00001-00002)

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HALL PRANGLE & SCHOONVELD, LLC  
1160 NORTH TOWN CENTER DRIVE  
SUITE 200  
LAS VEGAS, NEVADA 89144  
TELEPHONE: 702-389-6400 FACSIMILE: 702-384-6025

45. Service Excellence Commitment Agreement  
(Exhibit SS attached hereto and bates labeled Service00001-00006)

46. Defendant reserves the right to supplement this list of documents.

47. Defendant reserves the right to utilize any document utilized or identified by any  
other party to this litigation.

DATED this 20<sup>th</sup> day of July, 2015.

HALL PRANGLE & SCHOONVELD, LLC

By:

MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

JOHN F. BEMIS, ESQ.

Nevada Bar No. 9509

1160 North Town Center Drive, Suite 200

Las Vegas, NV 89144

Attorneys for Defendant

Valley Health System, LLC d/b/a

Centennial Hills Hospital Medical Center

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 20<sup>th</sup> day of July, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S FOURTEENTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

Eckley M. Keach, Esq.  
ECKLEY M. KEACH, CHTD.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118

Robert C. McBride, Esq.  
CARROL, KELLY, TROTTER,  
FRANZEN, MCKENNA & PEABODY  
8329 W. Sunset Road, Suite 260  
Las Vegas, NV 89113

-and-  
James P.C. Silvestri, Esq.  
PYATT SILVESTRI  
701 Bridger Ave., Suite 600  
Las Vegas, NV 89101  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

*Attorneys for Defendant*  
*Steven Dale Farmer Attorneys for*  
*Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

**CASE NO. 70083**

---

**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**

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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

JGILMORE@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

JBEMIS@HPSLAW.COM

*Attorneys for Appellants*

**APPENDIX TO APPELLANTS' OPENING BRIEF**

**VOLUME XI of XVII**

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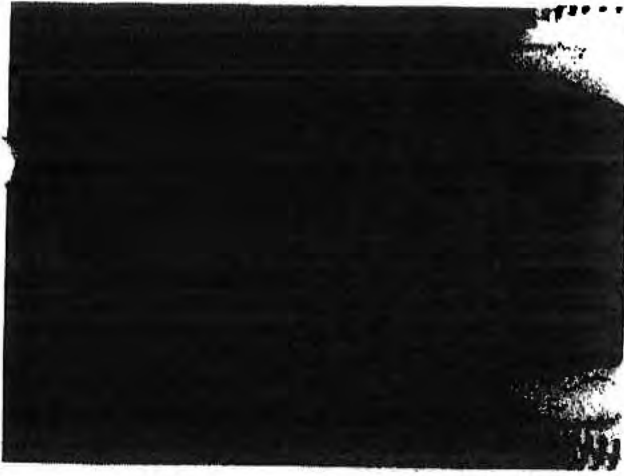
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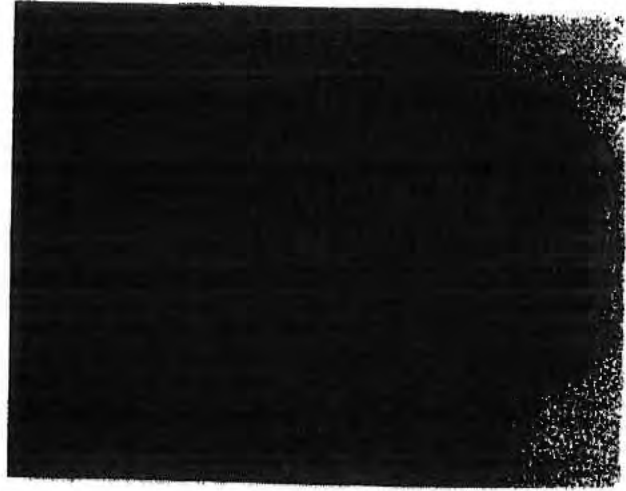
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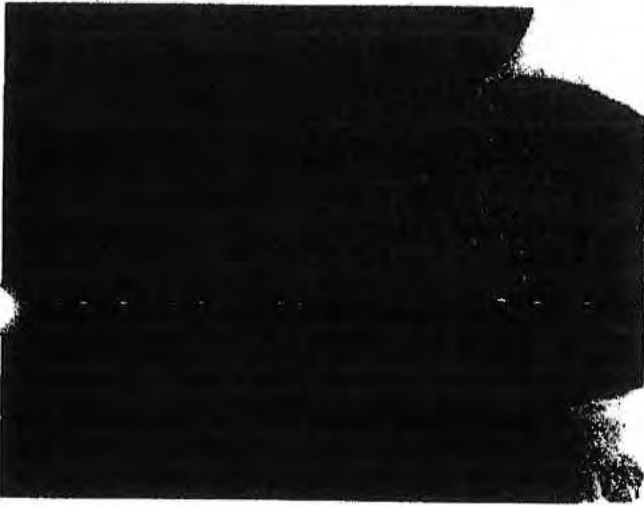
TAB 35  
PART TWO



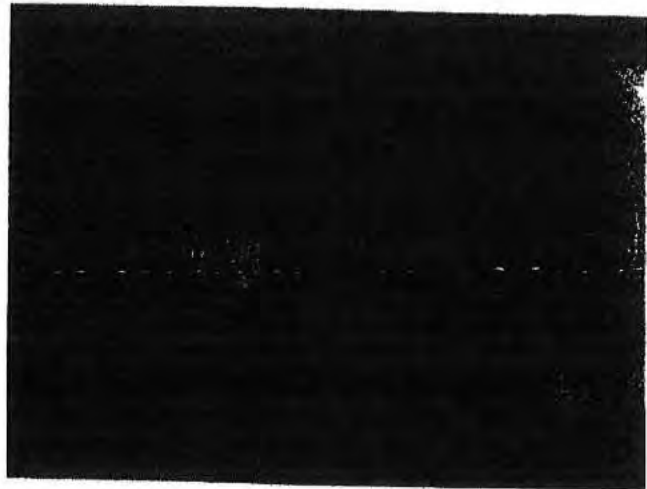
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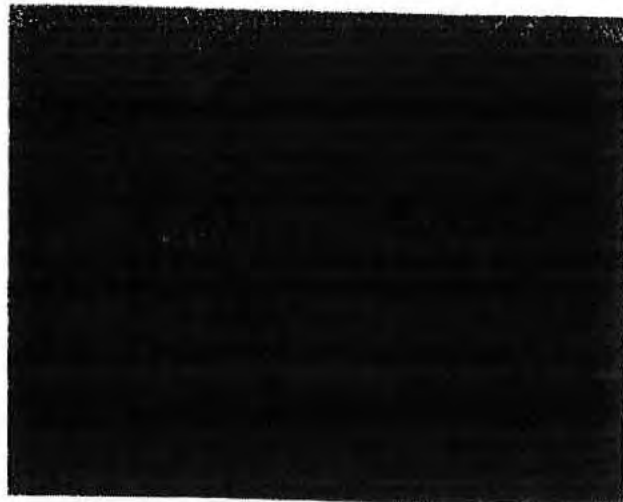
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Suzanne S. McCurdy  
Director, Police Records Bureau      Records Custodian



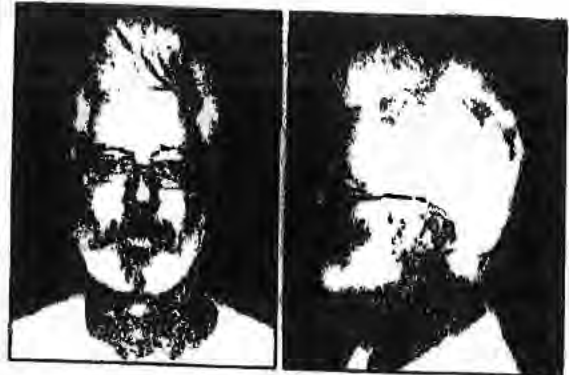
# Las Vegas Metro Police Department

**CONFIDENTIAL** 05-16-2008

Booking record for **SOUTHWICK, WILLIAM**

## Arrest Information

**Transaction Number:** 3427009      **CS #:** 2584931  
**FBI#:**      **State ID:**  
**Arrest Date:** 12-15-2006      **Arrest Time:** 21:30  
**Arrest Officer :**      **Arst Ofcr P#:**  
**Charge:** L1104 - DRIVING UNDER THE INFLUENCE OF  
ALCOHOL - M-01045-484.3791-11.14.010



## Suspect Information

**Name:** SOUTHWICK, WILLIAM  
**Address:**  
**Birth Date:** 06-02-1958  
**SSN #:**  
**Drivers License #:**

## Physical Description

**Sex:** Male      **Hair Color:** Gray  
**Race:** White      **Hair Length:** Short  
**Eye Color:** Blue      **Hair Style:** Straight  
**Height:** 6'0"      **Mustache:** Mustache  
                                 **Beard:** Beard  
                                 **Sideburns:** Yes  
**Weight:** 225      **Complexion:** Light  
**Glasses:** No      **Build:** Medium

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

# Las Vegas Metro Police Department

**CONFIDENTIAL**

05-16-2008

Booking record for **DRUMM, DANIEL**

## Arrest Information

**Transaction Number:** 3442156      **CS #:** 1714630  
**FBI#:**      **State ID:**  
**Arrest Date:** 09-17-2007      **Arrest Time:** 14:30  
**Arrest Officer :**      **Arst Ofcr P#:**  
**Charge:** L5018 - BATTERY/DOMESTIC VIOLENCE - M-  
02138-200.481-10.02.010  
L5018 - BATTERY/DOMESTIC VIOLENCE - M-  
02138-200.481-10.02.010



## Suspect Information

**Name:** DRUMM, DANIEL  
**Address:**  
**Birth Date:** 08-10-1953  
**SSN #:**  
**Drivers License #:**

## Physical Description

**Sex:** Male      **Hair Color:** Gray  
**Race:** White      **Hair Length:** Shoulder  
**Eye Color:** Hazel      **Hair Style:** Straight  
**Height:** 6'0"      **Mustache:** Mustache  
                         **Beard:** Beard  
                         **Sideburns:** Yes  
**Weight:** 210      **Complexion:** Light  
**Glasses:** No      **Build:** Medium

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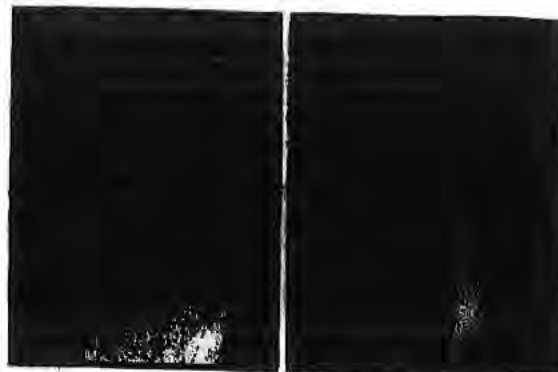
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Sharon S. McCurdy  
Director, Police Records Bureau      Records Custodian

05-16-2008

### Arrest Information

**Charge:**

**Drivers License #:**

**Glasses:** No      **Build:**

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Suzanne S. McCurdy  
Director, Police Records Bureau      Records Custodian

# Las Vegas Metro Police Department

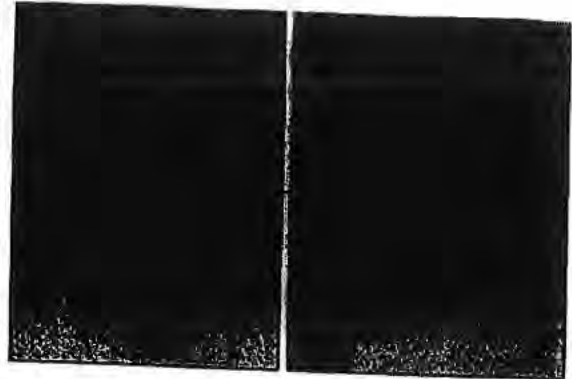
**CONFIDENTIAL**

05-16-2008

Booking record for **WYNN, JOHN**

## Arrest Information

**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'  
**Charge:** L5738-MISUSE OF BUS SHELTER BENCH - M-07756-  
L5131-INDECENT/IMMODEST BEHAVIOR - M-07749-201.22



## Suspect Information

**Name:** WYNN, JOHN  
**Address:**  
**Birth Date:** 02-22-1945  
**SSN #:**  
**Drivers License #:**

## Physical Description

**Sex:** Male      **Hair Color:** Gray  
**Race:** White      **Hair Length:** Balding  
**Eye Color:** Hazel      **Hair Style:** Straight  
**Height:** 6'2"      **Mustache:** Mustache  
                                 **Beard:** Beard  
                                 **Sideburns:** Yes  
**Weight:** 225      **Complexion:** Light  
**Glasses:** No      **Build:** Large

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MAY - 8 2013

on file with the Las Vegas Metropolitan Police Department.

Suzanne S. McCurdy  
Director, Police Records Bureau      Records Custodian

AA2061









## PROPERTY BUREAU

## ITEM INFORMATION

## DESCRIPTION

\$

AC# 08031650 CS# EV# 0805161021	Item 1 Qty 1 Type Miscellaneous Flags	 SEXUAL ASSAULT KIT CAGNINA, ROXANNE	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1A Qty 1 Type Miscellaneous Flags	 DNA EXTRACT JM-III FROM BREAST SWAB IN S/AKIT OF ROXANNE CAGNINA	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1B Qty 1 Type Miscellaneous Flags	 DNA EXTRACT JM -II2 FROM THIGH SWAB IN S/AKIT OF ROXANNE CAGNINA	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1C Qty 1 Type Miscellaneous Flags	 DNA EXTRACT RBQ - 120511-JM2	\$0.00
AC# 08031765 CS# F EV# 0805161021	Item 5A Qty 1 Type Miscellaneous Flags	 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 EV# 0805161021	Item 5B Qty 1 Type Miscellaneous Flags	 DNA EXTRACT OF RBK - 120711-JM FROM BUCCAL SWAB KIT OF STEVEN FARMER Pkg/Itm: 2/5 Sec Bg: 2/5	\$0.00
MONEY TOTAL			\$0.00

CONFIDENTIAL

2012 JAN 24

11:11

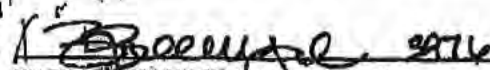
RECEIVED FROM EVIDENCE CUSTODIAN  
REASON PROPERTY IS BEING REMOVED:

EVID BARBARA LAMOUREUX, FOR 003108  
Lab Request



TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:



WASHOE COUNTY SHERIFF'S OFFICE  
911 PARR BLVD • RENO, NV 89512-1000



RANK:

PR:

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 item(s) within 5 days.

rXOOTRep

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Director, Police Records Bureau      Records Custodian

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
PHOTO LINE-UP WITNESS INSTRUCTIONS

**CONFIDENTIAL**

NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
PHONE NUMBER: \_\_\_\_\_

EVENT#: \_\_\_\_\_  
INTERVIEWED BY: \_\_\_\_\_  
LOCATION: \_\_\_\_\_  
DATE & TIME: \_\_\_\_\_

"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."

STATEMENT:

SIGNED: \_\_\_\_\_  
DATE & TIME: \_\_\_\_\_

SIGNED: \_\_\_\_\_  
DATE & TIME: \_\_\_\_\_

OFFICER'S NAME & P#:

LVMPD 104 (REV 5-96) - AUTOMATED/WP12

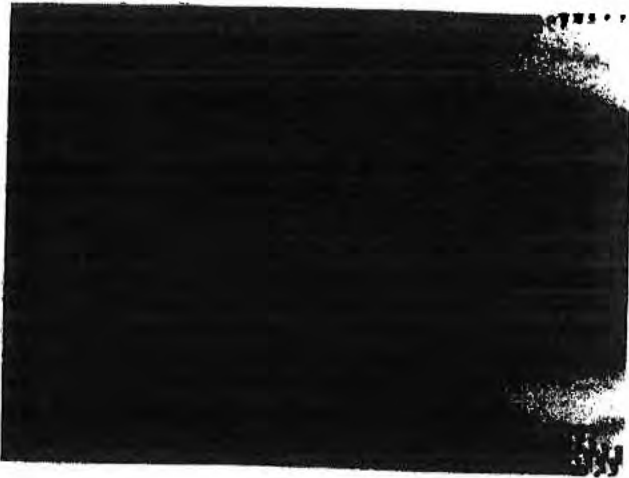
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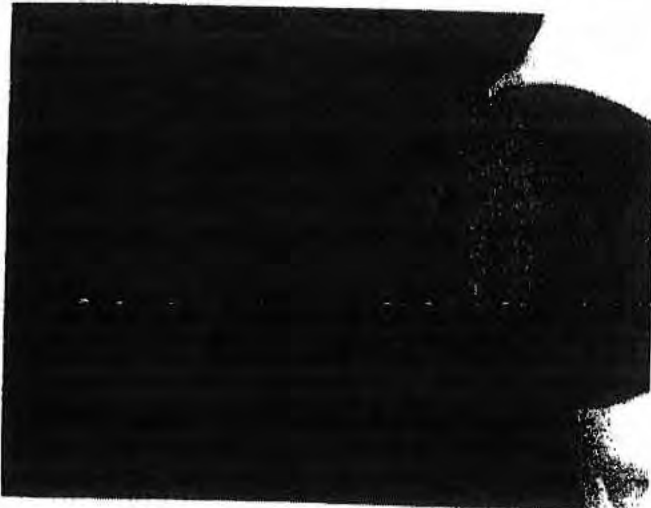
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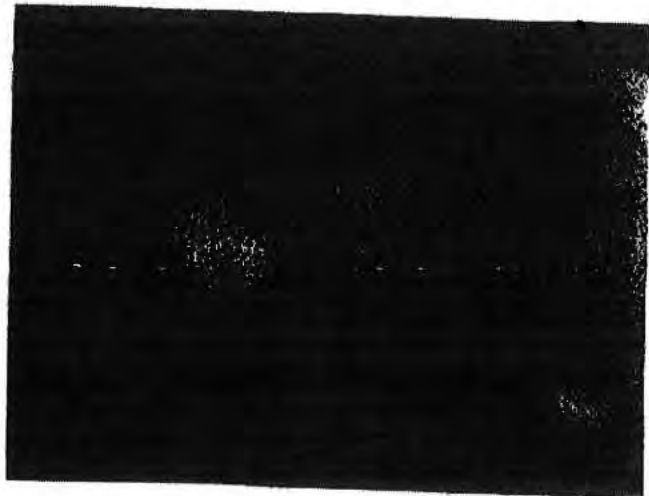
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6



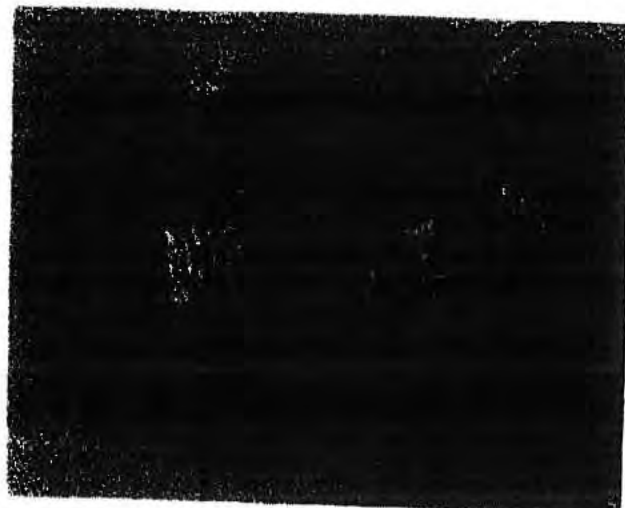
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1



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# ~~STATE~~ CALIFORNIA DEPARTMENT OF ~~TRANSPORTATION~~ MOTOR VEHICLES

FOR USE ONLY AS AUTHORIZED BY DMV

**E0046991** DRIVERS LICENSE  
CLASS1: Non-Commercial C CLASS2:

EXP DATE: 03/16/2009

**STEVEN DALE FARMER**

PO BOX 13  
ELDRIDGE CA 95431

DOB: 03/16/1952

SEX: M

HAIR: GRY

EYES: BLU

APP DATE: 09/08/2004

ISSUE DATE: 09/08/2004

PHOTO DATE: 09/08/2004

PHOTO SEQ #: 4224

TECHNICIAN ID: B7

RSTR

ENDORS:

HEIGHT: 510

WEIGHT: 210

APP OFFICE: 634

ISSUE OFFICE: 634

PHOTO OFFICE: 634

TYPE APP: D

State of California  
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.

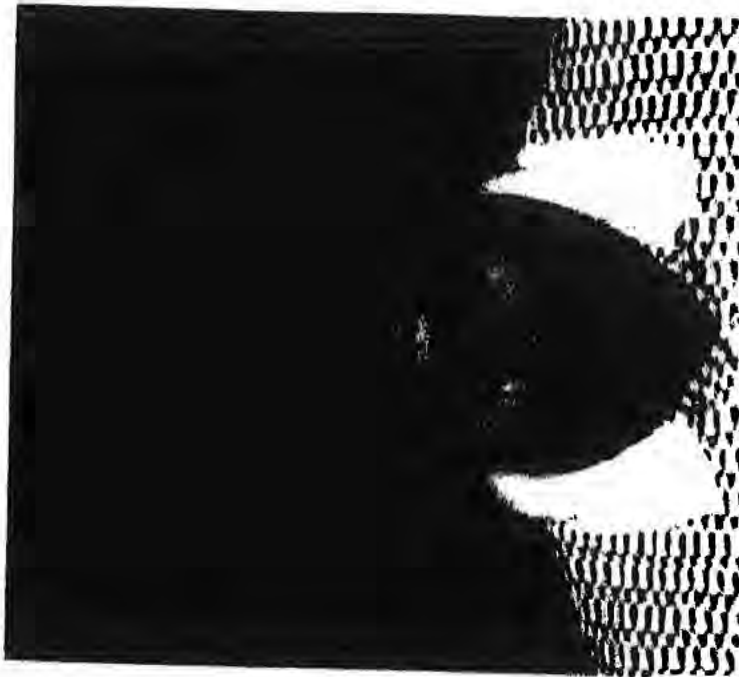


Motor Vehicle File No \_\_\_\_\_

Date \_\_\_\_\_

Signed \_\_\_\_\_

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



*Steven Dale Farmer*

CONFIDENTIAL

Machine: RWS1  
05/16/2008 19:28:42.819

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**DRIVER LICENSE/IDENTIFICATION CARD  
 LAW ENFORCEMENT INFORMATION REQUEST**

615968

VERBAL INFORMATION

Birthdate  
 Address  
 Status  
 DL/ID #  
 77 Call  
 Other

**CONFIDENTIAL**

☒ **RUSH**

Number of Requests: 1

REASON

**INVESTIGATION**

☐ TRAK ID #

☐ Red ☐ Yellow

☐ FAX Only #

☐ FAX/Mail

Comments

- ☐ Pick Up  
☒ Mail  
☐ Express Mail

Courier Name  
 Account #  
 Physical Address  
 City and State

Zip

REG. CENTER CODE/ORI  
**R9563**

BADGE # / TITLE  
**2804**

☐ SSN VERIFIED  
 TELEPHONE NUMBER  
**(702) 828-5676**

AGENCY NAME

**NV LAS VEGAS METRO PD/SEXUAL ASSAULT**

RECEIVED BY

**GORSKI RUTH**

DATE

**MVEXW2**

ADDRESS

**400 STEWART**

TIME

**5/16/2008**

CITY  
**LAS VEGAS**

STATE

**NV**

ZIP

**89101 -**

**10:54 AM**

LICENSE NUMBER

**E0046991**

BIRTHDATE

**03/16/1952**

NAME

**FARMER STEVEN DALE**

ADDRESS

- ☐ Certified ☐ TP ☐ P/O ☐ L1 ☐ DL44  
☒ Mug ☐ Sims ☐ Other  
☐ Suspension ☐ Service

CITE DATE

COURT DATE

- ☐ SSN  
☐ All Photos  
 (attach M-8)  
☐ M1 Attached  
☐ Confidential Address

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**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 known to be driving a 1989 Pontiac with California license 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 whereabouts, 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.

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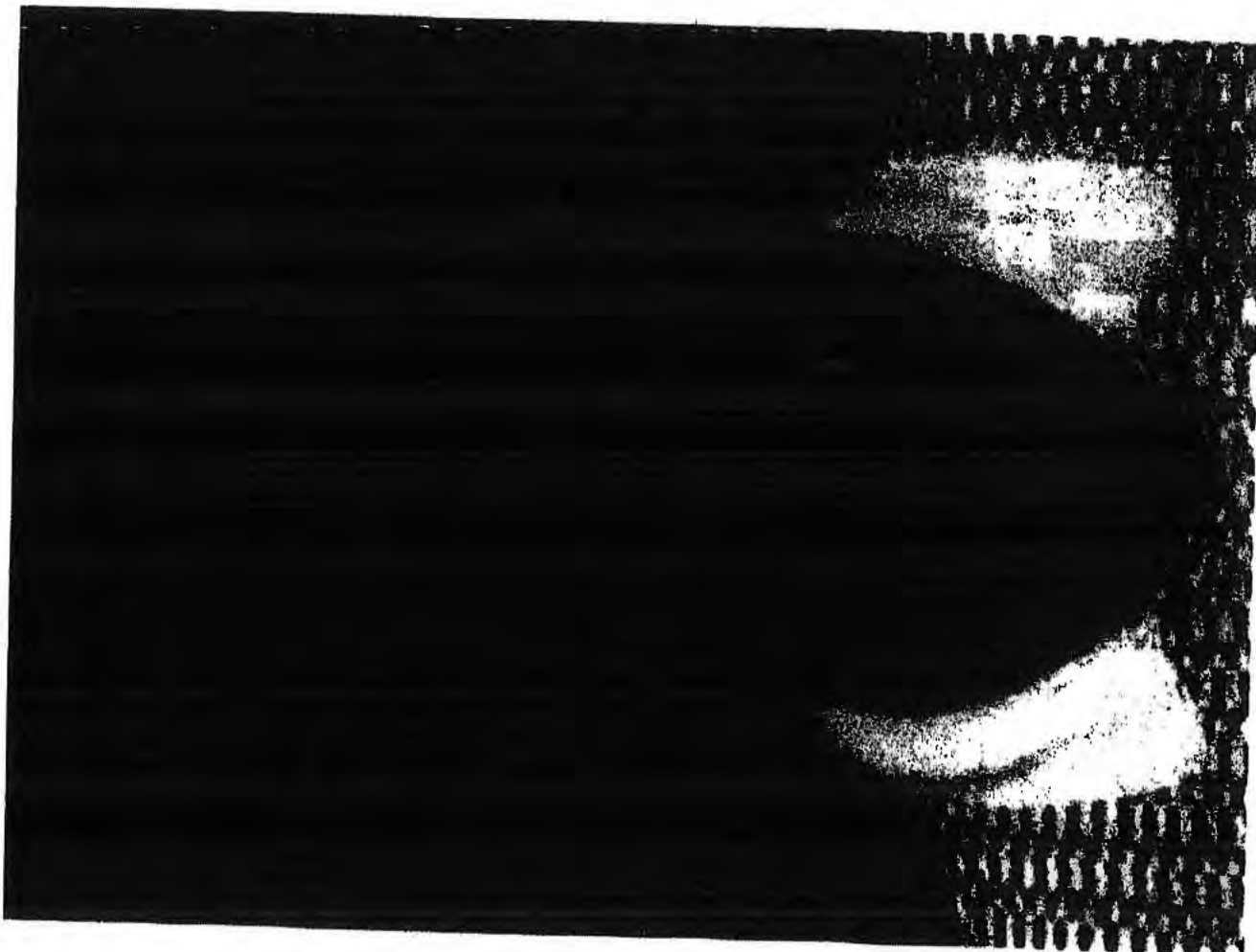
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CONFIDENTIAL

STEVE  
FARMER



AA2074

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Director, Police Records Bureau      Records Custodian



**NEVADA CRIME STOPPERS**

4750 W. OAKLEY, 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

**CONFIDENTIAL**

Report #: 194-6278

Caller #:

Client ID: 151

RCVD: 05/17/2008 06:15 AM\*

DLVD: 05/17/2008 08:12 AM\*

Call Taker: FT

PERPETRATOR	LOCATION
Pedophile	Las Vegas/NV

**GENERAL**

Date 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 crime: 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 Last: Farmer

Full Name: Steven Farmer

Alias or 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/Animals: Unknown

Gang Activity: Unknown

Employer/Work Schedule: Certified Nurse Assistant, he works for American Nursing 702. 638-1200

5/19/08  
CO 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 recipients time zone.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 1

**CONFIDENTIAL**

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: STEVEN FARMER**

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

**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 16<sup>th</sup>, 2008, at 2205 hours.

Operator, this is Detective C. Jex, P Number 5597. I=ll 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

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 2

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?

A. \_\_\_\_\_.

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.

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AA2081

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 3

EVENT #080516-1021  
STATEMENT OF: STEVEN FARMER

Q. 9108. And your Social Security Number?

A.

Q.

A.

Q.

A.

Q.

A.

Q. And your cell, 707 332-5894?

A. \_\_\_\_\_. (inaudible)

Q. I= m sorry?

A. Yes.

Q. That= s correct?

A. \_\_\_\_\_ B

Q. Okay. All right. All right. Because of the B because of the investigation, the allegations, everything, I= m B I= m going to read you your Miranda Rights.

Okay?

A. Okay.

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AA2083

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 4

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
- A. \_\_\_\_\_.
- 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

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 5

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

A. \_\_\_\_\_ before I answer anything, I want an attorney.

Q. Okay. All right.

Operator, end of interview. Time is 2209.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 6

EVENT #080516-1021

~~STATEMENT OF STEVEN FARMER~~

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

CJ:tp

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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

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

**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 16<sup>th</sup>, 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

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 2

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

4950. Interview=s taking place on the 16<sup>th</sup> 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.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 3

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

AA2094

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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?

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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?

A. \_\_\_\_\_.

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, Al=m just tryin= to relax you.@ And he actually \_\_\_\_\_ B

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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.

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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, AIf you just relax, it=ll help you go to sleep.@

Q. Okay.

A. He goes, AJust relax. It=ll 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?

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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. \_\_\_\_\_ B
- 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.

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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?

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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?

A. I do.

Q. Did any a the pictures come out?

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STATEMENT OF: ROXANNE CAGNINA

- A. No, they didn't come out.
- Q. Okay.
- A. I had no flash.
- Q. Okay. But it'll 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'll 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.

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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=ll 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.

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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.

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- 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
- A. \_\_\_\_\_.
- 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.
- A. \_\_\_\_\_ B
- Q. Is this before the penetration B
- A. I was \_\_\_\_\_ B
- Q. Is this before the pene B

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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

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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. I B

Q. Okay B

A. And, like, \_\_\_\_\_ B

Q. Do you know what B

A. \_\_\_\_\_ B

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 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.

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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?

A. \_\_\_\_\_.

Q. No? Okay.

A. No. But first thing in the morning, I called my husband B

Q. \_\_\_\_\_ B

A. 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. I asked for the nurse that was in charge.

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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. B up.

Q. Okay. Then B and then you called 9-1-1?

A. \_\_\_\_\_

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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, AI 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?

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STATEMENT OF: ROXANNE CAGNINA

A. \_\_\_\_\_.

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?

A. \_\_\_\_\_.

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 \_\_\_\_\_ B I don=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.@"

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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

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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 your B 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.

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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.

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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.

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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=ll 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?

A. \_\_\_\_\_.

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?

A. \_\_\_\_\_.

Q. No. Did he lay on top of you or kiss you?

A. No. No. He was really \_\_\_\_\_ about the other nurse comin= in.

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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?

A. \_\_\_\_\_.

Q. Okay.

A. Hmm.

Q. And the whole time, his hands were underneath the blankets, hmm, and everything?

A. \_\_\_\_\_.

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

JAN 20 11 00

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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.

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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:)

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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?

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EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. I 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=ll 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=ll B we=ll get it later.

A, Um, if you find the nurse he was working with and ask her B

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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?

A. \_\_\_\_\_.

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.

AA2148

JATHEBPC

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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.

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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

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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?

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EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. \_\_\_\_\_.

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 \_\_\_\_\_?

A. \_\_\_\_\_.

Q. Okay.

JAT/ED/TWJ

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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 16<sup>th</sup> of May,

2008. Same people present. Same location.

Thank you.

AA2158

AA2159

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EVENT #080516-1021

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~~STATEMENT OF ROXANNE GAGNIN~~

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO DRIVE, ROOM 725, ON THE 16th DAY OF MAY, 2008, AT 1114 HOURS.**

**MS:tp**

AA2160

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**VOLUNTARY STATEMENT**  
PAGE 1

EVENT #: 080516-1021

SPECIFIC CRIME: SEXUAL ASSAULT

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: LORRAINE WESCOTT

DOB:		SOCIAL SECURITY #:	
RACE:		SEX:	FEMALE
HEIGHT:		WEIGHT:	
HAIR:		EYES:	
WORK SCHEDULE:		DAYS OFF:	
HOME ADDRESS:	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 29<sup>TH</sup>, 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

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EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

at the Centennial Hills Hospital. Uh, the time is uh, 1340 hours on the 29<sup>th</sup> 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, W-B-W-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 16<sup>th</sup> 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.

Q. Okay. Can you tell me what that uh, that conversation consisted of?

AA2164

JAN 13 07 10

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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.

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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 andB

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?

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**VOLUNTARY STATEMENT**

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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 like B

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 and

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? Or B

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 down B

Q. No. Okay. But B

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Director, Police Records Bureau      Records Custodian

**VOLUNTARY STATEMENT**

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**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, around 3:00 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.

A. \_\_\_\_\_

Q. Okay. And then after she told then you of course ran it up the, youByou went to your supervisor=s andBband 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?

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**VOLUNTARY STATEMENT**

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**CONFIDENTIAL**

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.

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**VOLUNTARY STATEMENT**

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**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 29<sup>th</sup> of May, 2008. Same people present. Same location.

---

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO,  
LAS VEGAS, NEVADA 89149 ON THE 29<sup>TH</sup> DAY OF MAY, 2008 AT 1345 HOURS.**

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 1

**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:** KAREN GOODHART

<b>DOB:</b>		<b>SOCIAL SECURITY #:</b>	
<b>RACE:</b>		<b>SEX:</b>	
<b>HEIGHT:</b>		<b>WEIGHT:</b>	
<b>HAIR:</b>		<b>EYES:</b>	
<b>WORK SCHEDULE:</b>		<b>DAYS OFF:</b>	
<b>HOME ADDRESS:</b>		<b>HOME PHONE:</b>	
<b>WORK ADDRESS:</b>		<b>WORK PHONE:</b>	

**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,

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**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Nevada 89149. The date is the 30<sup>th</sup> of May, 2008, at approximately 0651 hours. Present for this interview last name of Goodhart, G-O-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?

A. Correct.

Q. Okay. Is it alright if I call you Karen?

A. Yes.

Q. Okay. Um Karen, I wanted uh direct your attention back to an incident that occurred on the 16<sup>th</sup> 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.

Q. Okay. Um, on the morning in question uh, you=re aware that uh Steven had been arrested for um, for uh sexual assaulting a patient. And that patient uh, her name was Roxanne Cagnina.

A. Right.

Q. Is that correct?

A. Yes.

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PAGE 3

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.

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**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Q. They=d be at medicalB

A. Bas far as I=m, as far as I know, IB

Q. Okay. Um, when Mr. Farmer took her upstairs um, how long, how long is an average trip to take somebody from the ER to a room and to come back, on average?

A. I average probably ten to fifteen minutes.

Q. Okay. And on this particular morning, was, how long do you think Mr. Farmer was gone for?

A. It seemed like he was gone for a long period of time, thirty to forty minutes, maybe. Maybe even longer. This is, uh, I, he did not come back down until close to seven o=clock.

Q. You think it was close to se, okayB

A. Because I had, I know I had set it up somewhere between five-thirty and six-thirty and I sent her up. Like I said for the exact time, I really don=t know.

Q. Okay. And, it just seemed to be quite a while?

A. It, it just seemed to be quite a long time.

Q. Okay.

A. I saidB

Q. Is that unusual?

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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.

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

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**VOLUNTARY STATEMENT**

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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?

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EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

A. No that would not be uncommon. Most the time you would have to, you=d put the call light on wait.

Q. Mm-hmm.

A. Sometimes if they see you come up, they will be there or whatever but most the time you=d have to get their attention.

Q. Okay.

A. Go find them. And they, you know, they could be in the room. I=m not sure what 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?

A. Yeah, right.

Q. Okay. Make any comments to anything?

A. That just, that he had to wake her up and stuff.

Q. Okay.

A. >Cause she was quite comfortable when she went upstairs.

Q. Did um, when did you first hear about the allegations?

A. At, whatever time in the morning you guys called me.

Q. Well, when I first called you and left a message?

A. Yes. Yes.

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EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Q. Okay. So it was ten-thirty, eleven in the morning I think, somewhere in thereB

A. Yeah. That=s B

Q. I left a message. Okay.

A. No actually I had talked to you >cause the phone was at the head of the bed. So, 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.

Q. I think I called your CB, uh I had two different phone numbers for you, I called one (both talking)B

A. One on the cellB

A. Okay. The first, the home phone when you called, that=s when.

Q. Okay.

A. Yeah, the cell phone I leave out of the room.

Q. Okay. Did um, have you ever heard or did anybody ever tell you about any other um, inappropriate things that Mr. Farmer=s ever done?

A. No sir.

Q. Ever had any other complaints?

A. No.

Q. Okay. Is there anything else you can think of that might be beneficial to me with my investigation as far as uhB

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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?

A. 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, I=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

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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 30<sup>th</sup> of May. Same people present. Same location. Thank you.

---

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE 30<sup>TH</sup> DAY OF MAY, 2008 AT 0700 HOURS.**

MS:lc

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**VOLUNTARY STATEMENT**  
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**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

<b>DOB:</b>		<b>SOCIAL SECURITY #:</b>	
<b>RACE:</b>		<b>SEX:</b>	Female
<b>HEIGHT:</b>		<b>WEIGHT:</b>	
<b>HAIR:</b>		<b>EYES:</b>	
<b>WORK SCHEDULE:</b>		<b>DAYS OFF:</b>	
<b>HOME ADDRESS:</b>	3350 N. Durango #1120 Las Vegas, Nevada 89149	<b>HOME PHONE:</b>	734-624-2755
<b>WORK ADDRESS:</b>		<b>WORK PHONE:</b>	

**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.

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**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.

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**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.

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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 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.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
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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.
- 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?

AA2206

JATVBC

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on file with the Las Vegas Metropolitan Police Department

Suzanne S. McCurdy  
Director, Police Records Bureau      Records Custodian

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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT**

**PAGE 6**

**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.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
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EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

Q. Okay. Um, and that was at, you said about four-twenty.

A. Um-hum.

Q. Okay.

A. Yes.

Q. And what time, do you, do you recall what time that you annotated on your notes, for arrival?

A. A around a quarter to five.

Q. Okay. And is, would this um, I=m gonna show you this paper right here and it=s a - it=s a, looks like nurses notes.

A. Um-hum.

Q. It=s um, given to me by Centennial Hills. It says, 0445 a, patient to floor on stretcher. A vi., \_\_\_\_\_-

A. Vital signs stable.

Q. Okay. Heavily sedated, needed assistance to walk to bathroom, stated my headache is still not gone.

A. Um-hum.

Q. Okay. Alright. Now, did she disclose or she say anything to you at that time about anything that a, a might of happened to her or occurred?

A. No.

Q. And did she seem distressed or scared?

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
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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.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
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**CONFIDENTIAL**

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.

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

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 10

**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, \_\_\_\_\_.

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?

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
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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.

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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 12**

**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=ll 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, \_\_\_\_\_.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
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=ll 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?

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.

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
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**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.

A. 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

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
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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. 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, \_\_\_\_\_.

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**VOLUNTARY STATEMENT**  
PAGE 16

**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 13<sup>th</sup> of June, 2008. Same people present, same location. Thank  
you.

---

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE  
13<sup>th</sup> DAY OF JUNE, 2008 AT 0649 HOURS.**

MS:st

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JAT/BJP/11/12

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AA2229



Date: October 9, 2012

OCT 16 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
8	8177-1/1	Right hand finger swabs from Farmer
9	8177-1/2	Left hand finger swabs from Farmer
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.

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Date: October 9, 2012

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**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.

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Date: October 9, 2012

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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 Jeskie

Forensic DNA Analyst II

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AA2235

## PROPERTY BUREAU

## ITEM INFORMATION

## DESCRIPTION

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\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

AC# 08031650 Item 1A  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

DNA EXTRACT JM-111 FROM BREAST  
SWAB IN S/AKIT OF ROXANNE CAGNINA

AC# 08031650 Item 1B  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

DNA EXTRACT JM -112 FROM THIGH  
SWAB IN S/AKIT OF ROXANNE CAGNINA

AC# 08031650 Item 1C  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

DNA EXTRACT  
RBQ - 120511-JM2

AC# 08031650 Item 1D  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

VAGINAL SWABS FROM S/A KIT MARKED  
KP1B1

AC# 08031650 Item 1E  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

FACE SWABS FROM S/A KIT MARKED  
KP1C1

AC# 08031650 Item 1F  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

LABIAL SWABS FROM S/A KIT MARKED  
KP1G

AC# 08031650 Item 1G  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

BUCCAL SWAB FOR CAGNINA FROM S/A  
KIT MARKED KP1A

AC# 08031650 Item 1H  
CS# Qty 1  
EV# 0805161021 Type UNCLASS  
Flags

COPIES OF PAPERWORK FROM S/A KIT  
FOR CAGNINA

RECEIVED FROM EVIDENCE CUSTODIAN  
REASON PROPERTY IS BEING REMOVED:

EVID ANGELA MOORE, FOR [004028]  
Lab Request



TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:

*Allison Chapman*  
SORENSEN FORENSICS  
2495 SOUTH WEST TEMPLE • SALT LAKE CITY, UT 84115

RANK:

PH:

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 item(s) within 5 days.

rXOOTRcp

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AA2237



DATE 06-13-2012

TIME 01:34:04 PM

## PROPERTY BUREAU

ITEM INFORMATION		DESCRIPTION	\$
AC# 08031765 US# F EV# 0805161021	Item 1 Qty 2 Type UNCLASS Flags 	 RT HAND FINGER SWABS - STEVEN FARMER Pkg/Itm: 1/1 Sec Bg: 1/1	\$0.00
AC# 08031765 US# F EV# 0805161021	Item 2 Qty 2 Type UNCLASS Flags 	 LEFT HAND FINGER SWABS - STEVEN FARMER Pkg/Itm: 1/2 Sec Bg: 1/2	\$0.00
AC# 08031765 US# F EV# 0805161021	Item 5 Qty 1 Type UNCLASS Flags 	 DNA BUCCAL SWAB KIT - STEVEN FARMER Pkg/Itm: 2/5 Sec Bg: 2/5	\$0.00
MONEY TOTAL			\$0.00

RECEIVED FROM EVIDENCE CUSTODIAN EVID ANGELA MOORE, FOR [004028]  
REASON PROPERTY IS BEING REMOVED: Lab Request



TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:

SORENSEN FORENSICS  
2495 SOUTH WEST TEMPLE • SALT LAKE CITY, UT 84115



RANK:  
PW:  
AGENCY:

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rXOOTRep

AA2238

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Director, Police Records Bureau      Records Custodian

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**PROPERTY WITHDRAWAL RECEIPT**

PAGE 1

DATE 06-13-2012

TIME 01:09:13 PM

**PROPERTY BUREAU****ITEM INFORMATION****DESCRIPTION****\$**

AC# 08031765 CS# F EV# 0805161021	Item 1 Qty 2 Type UNCLASS Flags 	 RT HAND FINGER SWABS - STEVEN FARMER Pkg/Itm: 1/1 Sec Bg: 1/1	\$0.00
AC# 08031765 CS# F EV# 0805161021	Item 2 Qty 2 Type UNCLASS Flags 	 LEFT HAND FINGER SWABS - STEVEN FARMER Pkg/Itm: 1/2 Sec Bg: 1/2	\$0.00
AC# 08031765 CS# F EV# 0805161021	Item 3 Qty 1 Type UNCLASS Flags 	 RIGHT HAND FINGERNAIL SCRAPINGS - STEVEN FARMER Pkg/Itm: 1/3 Sec Bg: 1/3	\$0.00
AC# 08031765 CS# F EV# 0805161021	Item 4 Qty 1 Type UNCLASS Flags 	 LEFT HAND FINGERNAIL SCRAPINGS - STEVEN FARMER Pkg/Itm: 1/4 Sec Bg: 1/4	\$0.00

**CONFIDENTIAL****MONEY TOTAL****\$0.00**

RECEIVED FROM EVIDENCE CUSTODIAN: EVID ANGELA MOORE, FOR [004028]

REASON PROPERTY IS BEING REMOVED: Furtherance of investigation

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

EVID ANGELA MOORE, FOR [004028]

**TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -**

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RANK: \_\_\_\_\_ P#: \_\_\_\_\_ AGENCY: \_\_\_\_\_

STREET: \_\_\_\_\_ CITY: \_\_\_\_\_ ST: \_\_\_\_\_ ZIP: \_\_\_\_\_

**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 item(s) within 5 days.

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.

Suzanne S. McCurdy  
Director, Police Records Bureau      Records Custodian










**PROPERTY WITHDRAWAL RECEIPT**

PAGE 1

DATE 06-12-2012

TIME 08:38:51 AM

**PROPERTY BUREAU****ITEM INFORMATION****DESCRIPTION****\$**

AC# 08031650 CS# EV# 0805161021	Item 1 Qty 1 Type UNCLASS Flags 	 SEXUAL ASSAULT KIT CAGNINA, ROXANNE	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1A Qty 1 Type UNCLASS Flags 	 DNA EXTRACT JM-111 FROM BREAST SWAB IN S/AKIT OF ROXANNE CAGNINA	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1B Qty 1 Type UNCLASS Flags 	 DNA EXTRACT JM -112 FROM THIGH SWAB IN S/AKIT OF ROXANNE CAGNINA	\$0.00
AC# 08031650 CS# EV# 0805161021	Item 1C Qty 1 Type UNCLASS Flags 	 DNA EXTRACT RBQ - 120511-JM2	\$0.00
AC# 08031765 CS# F EV# 0805161021	Item 5A Qty 1 Type UNCLASS Flags 	 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 EV# 0805161021	Item 5B Qty 1 Type UNCLASS Flags 	 DNA EXTRACT OF RBK - 120711-JM FROM BUCCAL SWAB KIT OF STEVEN FARMER Pkg/Itm: 2/5 Sec Bg: 2/5	\$0.00

**MONEY TOTAL****\$0.00**

RECEIVED FROM EVIDENCE CUSTODIAN: EVID ANGELA MOORE, FOR [004028]  
REASON PROPERTY IS BEING REMOVED: Furtherance of investigation  
OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

EVID ANGELA MOORE, FOR [004028]

**TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -**

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RANK: \_\_\_\_\_ P#: \_\_\_\_\_ AGENCY: \_\_\_\_\_

STREET: \_\_\_\_\_ CITY: \_\_\_\_\_ ST: \_\_\_\_\_ ZIP: \_\_\_\_\_

**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 item(s) within 5 days.

rXOPORcp

AA2242

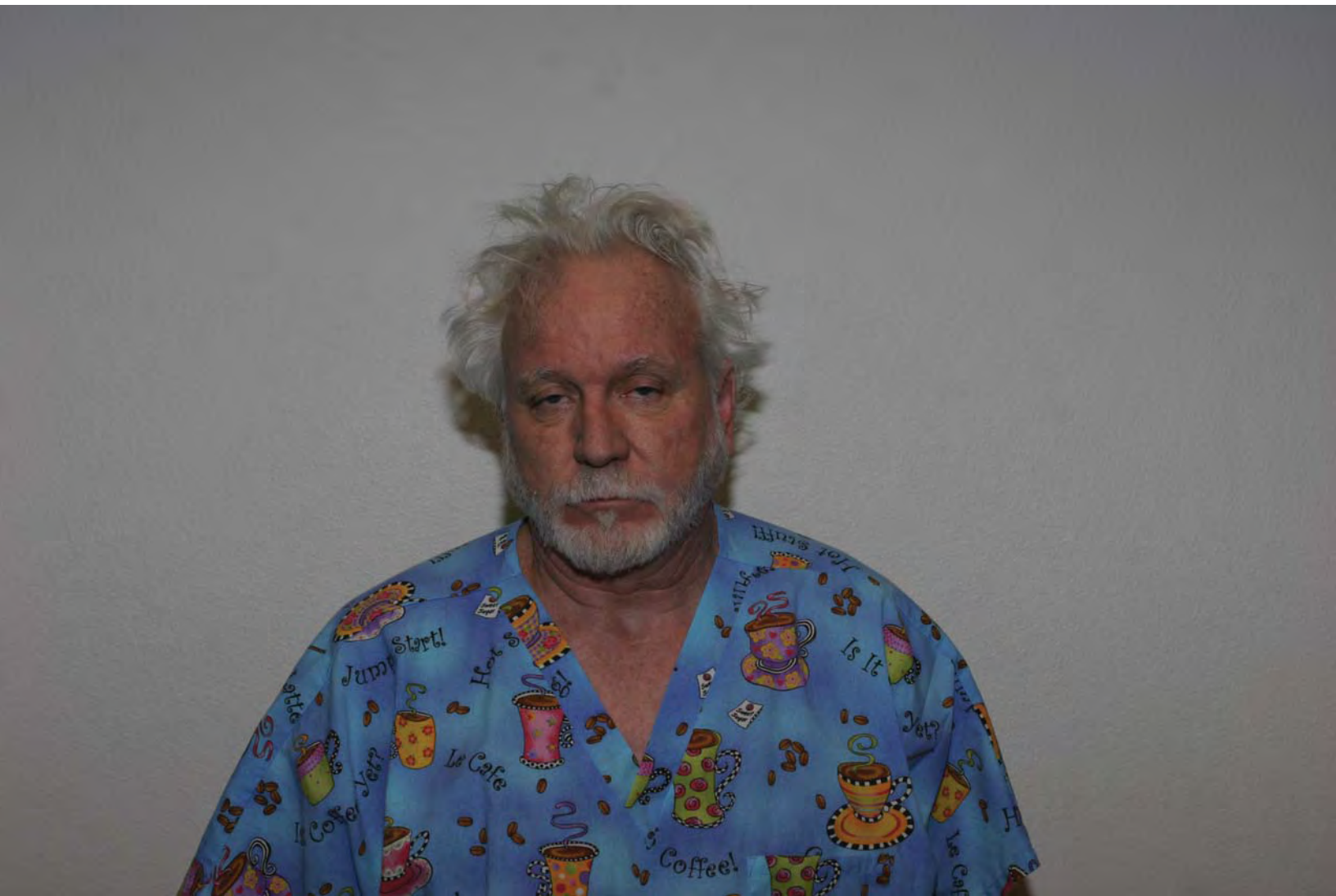
I hereby certify this is a full, true and correct copy of the:  
ORIGINAL DOCUMENT  
(HARD COPY/COMPUTERIZED/MICROGRAPHIC COPY)

MAY - 8 2013

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

AA2243

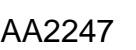
TAB 36



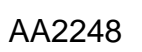












Page 1 of 1

### RETURN

(Must be made within 10 days of issuance of Warrant)

The Search and Seizure Warrant authorizing a search and seizure at the following described location(s):  
STEVE CARROLL'S HOME

was executed on 5/11/93 (month, day, year)

A copy of this inventory was left with STEVE CARROLL'S HOME

The following is an inventory of property taken pursuant to the warrant:

1. TRUCK
2. TRUCK
3. TRUCK

This inventory was made by: [Signature]

LS-100 (Rev. 10-1-82)

### DUPLICATE ORIGINAL SEARCH WARRANT

NRS 179.045

STATE OF NEVADA

The State of Nevada, to any Peace Officer in the County of Clark. Proof having been made before me by Det. CODY is probable cause to believe that certain evidence, to wit:

1. TRUCK
2. TRUCK
3. TRUCK

is presently located at: STEVE CARROLL'S HOME and as I am satisfied that there is probable cause to believe that said evidence is located as set forth above and based upon the statement of Det. CODY there are sufficient grounds for the issuance of the Search Warrant.

You are hereby commanded to search said premises/vehicle for said property, serving this warrant (At any hour of the day or night) (Between 7 am and 7 pm) and if the property is there to seize it and leave a written inventory and make a return before me within 10 (ten) days.

Dated this 11 day of MAY, 1993 at 10:30 o'clock P m.

(Print Judge's Name) WILLIAM V. V. V.

Signed by Detective CODY

Witnessed by [Signature]

ENDORSED this \_\_\_\_\_ day of \_\_\_\_\_ acting upon oral authorization of Judge V. V. V.

JUDGE

TAB 37

ECC

MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

DAVID P. FERRAINOLO, ESQ.

Nevada Bar No. 8452

HALL PRANGLE & SCHOONVELD, LLC

777 North Rainbow Blvd., Ste. 225

Las Vegas, Nevada 89107

Phone: 702-889-6400

Facsimile: 702-384-6025

[mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

[dferrainolo@hpslaw.com](mailto:dferrainolo@hpslaw.com)

Attorneys for Defendants

Centennial Hills Hospital and

UHS, Inc.

DISTRICT COURT  
CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

DEFENDANT CENTENNIAL HILLS HOSPITAL AND UNIVERSAL HEALTH  
SERVICES, INC.'S INITIAL EARLY CASE CONFERENCE  
LIST OF WITNESSES AND DOCUMENTS

DEFENDANT VALLEY HEALTH SYSTEM, LLC, D/B/A CENTENNIAL HILLS  
HOSPITAL (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law



DR082411067

HALL PRANGLE & SCHOONVELD, LLC  
RAINBOW CORPORATE CENTER  
777 NORTH RAINBOW BLVD., STE. 225  
LAS VEGAS, NEVADA 89107  
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

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.  
8 Murdock & Associates, Chtd.  
9 520 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  
16 the incident.

- 17 3. Steven Dale Farmer  
18 c/o Robert C. McBride, Esq.  
19 Nevada Bar No. 7082  
20 Mandelbaum Schwarz Ellerton & McBride  
21 2012 Hamilton Lane  
22 Las Vegas, Nevada 89106

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

- 25 4. Debra Scott, MSN, RN, FRE  
26 Executive Director  
27 Nevada State Board of Nursing  
28 5011 Meadowwood Mall Way  
Suite 300  
Reno, Nevada 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).



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.

8. 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

1 The above described witnesses are expected to be identified during discovery and to  
2 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
3 questions including but not limited to investigations performed, background checks performed  
4 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

5 9. Defendant reserves the right to supplement its list of witnesses.

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

8 **II.**  
9 **DOCUMENTS**

10 1. Jane Doe's medical records Bates Stamped CH00001 through CH00317  
11 (Exhibit A on attached CD).

12 2. Centennial Hills Hospital Daily Security Logs  
13 Bates Numbered SDAL 000001 - 001421 (Exhibit B on attached CD).

14 3. Records produced by Nevada State Board of Nursing  
15 (Exhibit C on attached CD).

16 4. Centennial Hills Hospital Job Description for CNA  
17 Bates Numbered Unit Coord/C N A - 1 -8 (Exhibit D on attached CD).

18 5. Defendant reserves the right to supplement this list of documents.

19 6. Defendant reserves the right to utilize any document utilized or identified by any  
20 other party to this litigation.

21 Dated this 24 day of November, 2009.

22 **HALL PRANGLE & SCHOONVELD, LLC**

23 By: 

24 **MICHAEL E. PRANGLE, ESQ.**

25 Nevada Bar No. 8619

26 **DAVID P. FERRAINOLO, ESQ.**

27 Nevada Bar No. 8452

28 777 North Rainbow Blvd., Ste. 225

Las Vegas, Nevada 89107

Attorneys for Defendant

Centennial Hills Hospital

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 04 day of November, 2009, I served a true and correct copy of the foregoing  
**DEFENDANT CENTENNIAL HILLS HOSPITAL AND UNIVERSAL HEALTH SERVICES, INC.'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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

Brent Vogel, Esq.  
Lewis Brisbois Bisgaard & Smith  
400 South Fourth Street, Ste. 500  
Las Vegas, Nevada 89101  
*Attorneys for American Nursing Services, Inc.*

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

TAB 38

## VAULT EXHIBIT FORM

CASE NO. A 595780

## how calendar

Calendar  
TRIAL DATE: 11-9-09

DEPT. NO. 11

JUDGE: Valerie Vega

Jane Doe

CLERK: NORA PEÑA

---

REPORTER: Lisa Lizotte

PLAINTIFF \_\_\_\_\_

VS

Robert Murdock.

$$1.10 \quad 1.018 \pm 0.002$$

COUNSEL FOR PLAINTIFF David Ferrainolo  
211 E. 1st St. Suite 100

Valley Health System LLC, et al.  
DEFENDANT

Robert M. Brude/ Brent Vogel  
COUNSEL FOR DEFENDANT

[illegible]

OFFERED		ADMITTED	
DATE	OBJ	DATE	OBJ
Pitt's Exhibit			

1. Photo of Universal Health Svcs address	11/9	✓	no	✓	11/9/09
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[illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible]

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[illegible][illegible][illegible][illegible]

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[illegible][illegible]



1635

PLAZA WEST



Lawyers Title

Universal Health Svcs.

MARKED FOR IDENTIFICATION

CASE  
PROP

PLAINTIFF'S  
EXHIBIT

1  
A595780

11-9-09

TAB 39



1 SUPP

2 MICHAEL E. PRANGLE, ESQ.

3 Nevada Bar No. 8619

4 DAVID P. FERRAINOLO, ESQ.

5 Nevada Bar No. 8452

6 JOHN F. BEMIS, ESQ.

7 Nevada Bar No. 9509

8 HALL PRANGLE & SCHOONVELD, LLC

9 777 North Rainbow Blvd., Ste. 225

10 Las Vegas, Nevada 89107

11 Phone: 702-889-6400

12 Facsimile: 702-384-6025

13 [mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

14 [dferrainolo@hpslaw.com](mailto:dferrainolo@hpslaw.com)

15 [jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

16 Attorneys for Defendants

17 Centennial Hills Hospital and

18 UHS, Inc.

13 DISTRICT COURT  
14 CLARK COUNTY, NEVADA

15 JANE DOE,

16 Plaintiff,

17 vs.

CASE NO. A595780

DEPT NO. II

18 VALLEY HEALTH SYSTEM LLC, a Nevada  
19 limited liability company, d/b/a CENTENNIAL  
20 HILLS HOSPITAL MEDICAL CENTER;  
21 UNIVERSAL HEALTH SERVICES, INC., a  
22 Delaware corporation; AMERICAN NURSING  
23 SERVICES, INC., a Louisiana corporation;  
24 STEVEN DALE FARMER, an individual; DOES I  
25 through X, inclusive; and ROE CORPORATIONS I  
26 through X, inclusive,

24 Defendants.

25 DEFENDANT CENTENNIAL HILLS HOSPITAL AND UNIVERSAL HEALTH  
26 SERVICES, INC.'S FIRST SUPPLEMENT TO IT'S INITIAL EARLY CASE  
27 CONFERENCE LIST OF WITNESSES AND DOCUMENTS  
28



RECEIVED  
APR 20 2010

BY: .....



1 DEFENDANT VALLEY HEALTH SYSTEM, LLC, D/B/A CENTENNIAL HILLS  
2 HOSPITAL (hereafter Centennial Hills Hospital), by and through its attorneys of record, the law  
3 firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits its NRCP 16.1 List of  
4 Witnesses and Documents as follows:

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- 20 3. Steven Dale Farmer  
21 c/o Robert C. McBride, Esq.  
22 Nevada Bar No. 7082  
23 Mandelbaum Schwarz Ellerton & McBride  
24 2012 Hamilton Lane  
25 Las Vegas, Nevada 89106

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Nevada State Board of Nursing  
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Suite 300  
Reno, Nevada 89502-6567

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

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Michelle Lucas

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Cobinder S. Chopra, M.D.  
James E. Mock, M.D.

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Las Vegas, Nevada 89101

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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

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Bates Numbered SDAL 000001 – 001421 (Exhibit B on attached CD).
3. Records produced by Nevada State Board of Nursing  
(Exhibit C on attached CD).
4. 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 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012  
(Exhibit E attached hereto)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023  
(Exhibit F attached hereto)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008.  
Bates Numbered ASSGIN000024 – 000035  
(Exhibit G attached hereto)

- 1 8. Steven Dale Farmer Staffing Sheets.  
2 Bates Numbered STAFF000001 – 000003  
(Exhibit H attached hereto)
- 3 9. Broadlane, Inc. Contract dated 08/12/2007  
4 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  
8 other party to this litigation.

9 DATED this 16<sup>th</sup> day of April, 2010.

10 HALL PRANGLE & SCHOONVELD, LLC

11  
12 By: 

13 MICHAEL E. PRANGLE, ESQ.

14 Nevada Bar No. 8619

15 DAVID P. FERRAINOLO, ESQ.

16 Nevada Bar No. 8452

17 JOHN F. BEMIS, ESQ.

18 Nevada Bar No. 9509

19 777 North Rainbow Blvd., Ste. 225

20 Las Vegas, Nevada 89107

21 *Attorneys for Defendant*

22 *Centennial Hills Hospital and UHS, Inc.*

HALL PRANGLE & SCHOONVELD, LLC  
RAINBOW CORPORATE CENTER  
777 NORTH RAINBOW BLVD., STE. 225  
LAS VEGAS, NEVADA 89107  
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 16<sup>th</sup> 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

Brent Vogel, Esq.  
Lewis Brisbois Bisgaard & Smith  
400 South Fourth Street, Ste. 500  
Las Vegas, Nevada 89101  
*Attorneys for American Nursing Services, Inc.*

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

**TAB 40**

1 SUPP

2 MICHAEL E. PRANGLE, ESQ.

3 Nevada Bar No. 8619

4 JOHN F. BEMIS, ESQ.

5 Nevada Bar No. 9509

6 HALL PRANGLE & SCHOONVELD, LLC

7 777 North Rainbow Blvd., Ste. 225

8 Las Vegas, Nevada 89107

9 Phone: 702-889-6400

10 Facsimile: 702-384-6025

11 [mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

12 [jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

13 Attorneys for Defendant

14 Valley Health System, LLC d/b/a

15 Centennial Hills Hospital Medical Center

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

18 JANE DOE,

19 Plaintiff,

20 vs.

21 VALLEY HEALTH SYSTEM LLC, a Nevada  
22 limited liability company, d/b/a CENTENNIAL  
23 HILLS HOSPITAL MEDICAL CENTER;  
24 UNIVERSAL HEALTH SERVICES, INC., a  
25 Delaware corporation; AMERICAN NURSING  
26 SERVICES, INC., a Louisiana corporation;  
27 STEVEN DALE FARMER, an individual; DOES I  
28 through X, inclusive; and ROE CORPORATIONS I  
through X, inclusive,

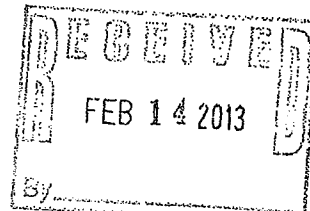
Defendants.

CASE NO. A595780

DEPT NO. II

23 DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
24 HOSPITAL MEDICAL CENTER'S SECOND 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



attorneys of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, hereby submits  
its Second 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.  
520 South Fourth 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.  
Nevada Bar No. 7082  
Mandelbaum Schwarz 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.

4. Debra Scott, MSN, RN, FRE  
Executive Director  
Nevada State Board of Nursing  
5011 Meadowwood Mall Way  
Suite 300  
Reno, Nevada 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).

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.

8. 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

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).
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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).
5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets.  
Bates Numbered STAFF000001 – 000003 (Exhibit H)

9. Broadlane, Inc. Contract dated 08/12/2007  
Bates Numbered BROADLANE000001 – 000050  
(Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer  
(Exhibit J attached hereto)
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)
12. Defendant reserves the right to supplement this list of documents.
13. Defendant reserves the right to utilize any document utilized or identified by any  
other party to this litigation.

DATED this 12<sup>th</sup> day of February, 2013.

HALL PRANGLE & SCHOONVELD, LLC

By:

MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

JOHN F. BEMIS, ESQ.

Nevada Bar No. 9509

777 North Rainbow Blvd., Ste. 225

Las Vegas, Nevada 89107

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 12<sup>th</sup> day of February, 2013, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S SECOND SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via facsimile and 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
MANDELBAUM ELLERTON &  
MCBRIDE  
2012 Hamilton Lane  
Las Vegas, Nevada 89106  
*Attorneys for Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4833-7222-7858, v. 1



**TAB 41**

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

[mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

vs.

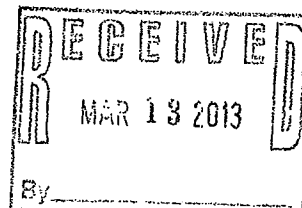
VALLEY HEALTH SYSTEM LLC, a Nevada  
limited liability company, d/b/a CENTENNIAL  
HILLS HOSPITAL MEDICAL CENTER;  
UNIVERSAL HEALTH SERVICES, INC., a  
Delaware corporation; AMERICAN NURSING  
SERVICES, INC., a Louisiana corporation;  
STEVEN DALE FARMER, an individual; DOES I  
through X, inclusive; and ROE CORPORATIONS I  
through X, inclusive,

Defendants.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S THIRD SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**

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 Third 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.  
520 South Fourth 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.  
Nevada Bar No. 7082  
Mandelbaum Schwarz 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.

4. Debra Scott, MSN, RN, FRE  
Executive Director  
Nevada State Board of Nursing  
5011 Meadowwood Mall Way  
Suite 300  
Reno, Nevada 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



1 Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing  
2 prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

- 3 5. Michael Egstad, Manager I  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
8 1615 Capitol Avenue  
9 Sacramento, CA 95899-7416

10 Mr. Egstad is expected to testify regarding The certification process, background check  
11 and investigation performed by the California Board of Nursing prior to CNA certification. The  
12 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
13 Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).  
14 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number  
15 00199703, Nurse Assistant Certificate 00659300).

- 16 6. Collado Jeunnesse, RN  
17 Kim Moon, RN  
18 Abraham Deppa, CNA  
19 Nikki Carter, CNA  
20 Marina McDowell, CNA  
21 Alana Schons, CNA  
22 Nelina Arante, RN  
23 Ronald Lodevico  
24 Venise Abelard, CNA  
25 Paula Mosley, RN  
26 Pamela Flagg, CNA  
27 Amber Vergara  
28 Loretta Korinis  
Michelle Lucas

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

- 31 7. Curtis E. Bazemore, M.D.  
32 Cobinder S. Chopra, M.D.  
33 James E. Mock, M.D.

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

- 36 8. Employees, former employees, representatives  
37 of and former representatives of American  
38 Nursing Services, Inc.,

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).
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Bates Numbered SDAL 000001 – 001421 (Exhibit B on CD).
3. Records produced by Nevada State Board of Nursing  
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(Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023  
(Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008.  
Bates Numbered ASSGIN000024 – 000035  
(Exhibit G)
8. Steven Dale Farmer Staffing Sheets.  
Bates Numbered STAFF000001 – 000003  
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(Exhibit J attached hereto)
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)
12. Privilege Log for Schedule of Steven Dale Farmer  
(Exhibit L attached hereto)
13. Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14,  
2008 bates labeled CHH00322 – CHH00325  
(Exhibit M attached hereto)
14. Defendant reserves the right to supplement this list of documents.
15. Defendant reserves the right to utilize any document utilized or identified by any  
other party to this litigation.

DATED this 11<sup>th</sup> day of March, 2013.

HALL PRANGLE & SCHOONVELD, LLC

By:

MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

JOHN F. BEMIS, ESQ.

Nevada Bar No. 9509

1160 North Town Center Drive, Suite 200

Las Vegas, NV 89144

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

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

CERTIFICATE OF SERVICE

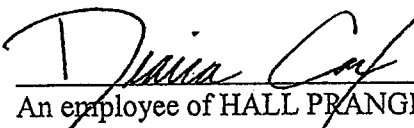
I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 11<sup>th</sup> day of March, 2013, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S THIRD SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS via facsimile and 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
MANDELBAUM ELLERTON &  
MCBRIDE  
2012 Hamilton Lane  
Las Vegas, Nevada 89106  
*Attorneys for Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4811-0850-3571, v. 2

**TAB 42**

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

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

[mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

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,

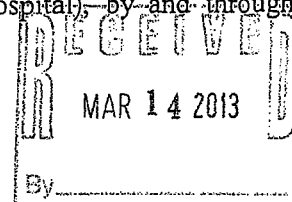
Defendants.

CASE NO. A595780

DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S FOURTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**

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 Fourth 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.  
520 South Fourth 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.  
Nevada Bar No. 7082  
Mandelbaum Schwarz 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.

4. Debra Scott, MSN, RN, FRE  
Executive Director  
Nevada State Board of Nursing  
5011 Meadowwood Mall Way  
Suite 300  
Reno, Nevada 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

1 Certificate (CNA021509). Investigation of Steven Dale Farmer by the Nevada Board of Nursing  
2 prior to revocation of Steven Dale Farmer's CNA certificate (CNA021509).

- 3 5. Michael Egstad, Manager I  
4 Licensing and Certification Program  
5 California Department of Public Health (CDPH)  
6 ATCS - MS 3301  
7 P.O. Box 997416  
8 1615 Capitol Avenue  
9 Sacramento, CA 95899-7416

10 Mr. Egstad is expected to testify regarding The certification process, background check  
11 and investigation performed by the California Board of Nursing prior to CNA certification. The  
12 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.  
13 Farmer (Home Health Certificate Number 00199703, Nurse Assistant Certificate 00659300).  
14 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number  
15 00199703, Nurse Assistant Certificate 00659300).

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17 Kim Moon, RN  
18 Abraham Deppa, CNA  
19 Nikki Carter, CNA  
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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.  
25 James E. Mock, M.D.

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

- 28 8. 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

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


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(Exhibit K attached hereto)
12. Privilege Log for Schedule of Steven Dale Farmer  
(Exhibit L attached hereto)
13. Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008  
bates labeled CHH00322 – CHH00325  
(Exhibit M attached hereto)
14. Privilege Log for Centennial Hills Hospital HR File for Steven Dale Farmer  
(Exhibit N attached hereto)
15. Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled  
CHH00326 – CHH00365  
(Exhibit O attached hereto)
16. Defendant reserves the right to supplement this list of documents.
17. Defendant reserves the right to utilize any document utilized or identified by any  
other party to this litigation.

DATED this 12<sup>th</sup> day of March, 2013.

HALL PRANGLE & SCHOONVELD, LLC

By:

  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

HALL PRANGLE & SCHOONVELD, LLC  
1160 NORTH TOWN CENTER DRIVE  
SUITE 200  
LAS VEGAS, NEVADA 89144  
TELEPHONE: 702-389-6400 FACSIMILE: 702-384-6025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 12<sup>th</sup> day of March, 2013, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S FOURTH 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
MANDELBAUM ELLERTON &  
MCBRIDE  
2012 Hamilton Lane  
Las Vegas, Nevada 89106  
*Attorneys for Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4847-4765-2883, v. 1

**TAB 43**

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

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

[mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

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,

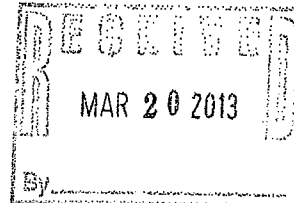
Defendants.

CASE NO. A595780

DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S FIFTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**

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 Fifth 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.  
520 South Fourth 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.  
Nevada Bar No. 7082  
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.

4. Debra Scott, MSN, RN, FRE  
Executive Director  
Nevada State Board of Nursing  
5011 Meadowwood Mall Way  
Suite 300  
Reno, Nevada 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).

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 Jeunesse, 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.

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. 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).
2. 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).
5. Daily Patient Assignment Sheets for the 6<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023 (Exhibit F)
7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008. Bates Numbered ASSGIN000024 – 000035 (Exhibit G)
8. Steven Dale Farmer Staffing Sheets.  
Bates Numbered STAFF000001 – 000003 (Exhibit H)



9. Broadlane, Inc. Contract dated 08/12/2007  
Bates Numbered BROADLANE000001 – 000050  
(Exhibit I)
10. Privilege Log for Schedule of Steven Dale Farmer  
(Exhibit J)
11. 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)
13. 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)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008,  
March 2008, April 2008 and May 2008  
(Exhibit P attached hereto)
17. Agency Payroll Spreadsheets for February 2008, March 2008, April, 2008,  
and May 2008 bates labeled CHH00366 – CHH00372.  
(Exhibit Q attached hereto)
18. Defendant reserves the right to supplement this list of documents.

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

19. Defendant reserves the right to utilize any document utilized or identified by any other party to this litigation.

DATED this 18<sup>th</sup> day of March, 2013.

HALL PRANGLE & SCHOONVELD, LLC

By:

  
MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

JOHN F. BEMIS, ESQ.

Nevada Bar No. 9509

1160 North Town Center Drive, Suite 200

Las Vegas, NV 89144

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

CERTIFICATE OF SERVICE

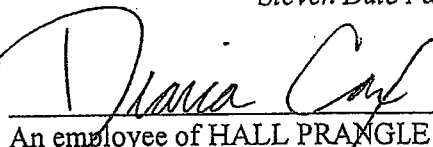
I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 18<sup>th</sup> day of March, 2013, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S FIFTH SUPPLEMENT TO IT'S INITIAL EARLY CASE 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
MANDELBAUM ELLERTON &  
MCBRIDE  
2012 Hamilton Lane  
Las Vegas, Nevada 89106  
*Attorneys for Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

**TAB 44**

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

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](mailto:mprangle@hpslaw.com)

[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)

*Attorneys for Defendant*

*Valley Health System, LLC d/b/a*

*Centennial Hills Hospital Medical Center*

DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

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.

CASE NO. A595780  
DEPT NO. II

**DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER'S SIXTH SUPPLEMENT TO IT'S INITIAL  
EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS**

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 Sixth 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.  
520 South Fourth 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.  
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.

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  
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 Jeunesse, 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.

- 1 8. Employees, former employees, representatives  
2 of and former representatives of American  
3 Nursing Services, Inc.,  
4 c/o LEWIS BRISBOIS BISGAARD & SMITH  
5 6385 South Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118

7 The above described witnesses are expected to be identified during discovery and to  
8 testify in regards to all facts and circumstances surrounding Steven Farmer and the incident in  
9 questions including but not limited to investigations performed, background checks performed  
10 regarding Steven Farmer and the assignment of Steven Farmer to Centennial Hills Hospital.

- 11 9. Crystal Johnson  
12 4650 North Rainbow Blvd., #2109  
13 Las Vegas, NV 89108  
14 714-580-5383

15 Ms. Johnson is expected to testify as to the facts and circumstances surrounding this  
16 matter. **THIS INDIVIDUAL IS REPRESENTED BY COUNSEL.**

- 17 10. Douglas Nichols  
18 c/o John F. Bemis, Esq.  
19 HALL PRANGLE & SCHOONVELD, LLC  
20 1160 North Town Center Drive, Suite 200  
21 Las Vegas, NV 89144

22 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this  
23 matter.

- 24 11. Mary Jo Solon  
25 Southwest Medical Associates

26 Ms. Solon is expected to testify as to the facts and circumstances surrounding this  
27 matter.

- 28 12. 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.



13. Michelle Simmons  
5336 Fireside Ranch Ave.  
Las Vegas, NV 89131

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. Defendant reserves the right to supplement its list of witnesses.
16. Defendant reserves the right to call any witnesses identified by any other parties in this litigation.

## II.

### DOCUMENTS

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6. Critical Care Services Assignment Sheets for the 5<sup>th</sup> Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000013 – 000023  
(Exhibit F)

**HALL PRANGLE & SCHOONVELD, LLC**

1160 NORTH TOWN CENTER DRIVE

SUITE 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

7. Emergency Department Daily Assignments dated 05/13/2008 – 05/18/2008.  
Bates Numbered ASSGIN000024 – 000035  
(Exhibit G)
8. Steven Dale Farmer Staffing Sheets.  
Bates Numbered STAFF000001 – 000003  
(Exhibit H)
9. Broadlane, Inc. Contract dated 08/12/2007  
Bates Numbered BROADLANE000001 – 000050  
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April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321  
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(Exhibit N)
15. Centennial Hills Hospital HR File for Steven Dale Farmer bates labeled  
CHH00326 – CHH00365  
(Exhibit O)
16. Privilege Log for Agency Payroll Spreadsheets for February 2008,  
March 2008, April 2008 and May 2008  
(Exhibit P)
17. 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)

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

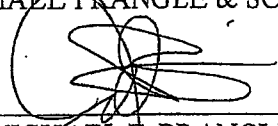
20. Medical Records from MountainView Hospital bates labeled MVH00001 – MVH00159 (Exhibit T attached hereto via CD)
21. Medical Records from Southern Hills Hospital bates labeled Shills00001 – Shills00241 (Exhibit U attached hereto via CD)
22. Medical Records from University Medical Center bates labeled UMC00001 – UMC00209 (Exhibit V attached hereto via CD)
23. Defendant reserves the right to supplement this list of documents.
24. Defendant reserves the right to utilize any document utilized or identified by any

other party to this litigation.

DATED this 7<sup>th</sup> day of June, 2013.

HALL PRANGLE & SCHOONVELD, LLC

By:

  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
*Attorneys for Defendant*  
*Valley Health System, LLC d/b/a*  
*Centennial Hills Hospital Medical Center*

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 7<sup>th</sup> day of June, 2013, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S SIXTH 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*

Eckley M. Keach, Esq.  
Eckley M. Keach, Chtd.  
520 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

S. Brent Vogel, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant*  
*American Nursing Services, Inc.*

Robert C. McBride, Esq.  
MANDELBAUM ELLERTON &  
MCBRIDE  
2012 Hamilton Lane  
Las Vegas, Nevada 89106  
*Attorneys for Defendant*  
*Steven Dale Farmer*

  
An employee of HALL PRANGLE & SCHOONVELD, LLC

4818-1872-9748, v. 1