

TAB 54

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1DISTRICT COURT

2CLARK COUNTY, NEVADA

3JANE DOE,

4Plaintiff,

5vs.

6CASE NO. 09-A-595780

7VALLEY HEALTH SYSTEM LLC,

8a Nevada limited

9liability company, d/b/a

10CENTENNIAL HILLS HOSPITAL

11MEDICAL CENTER; UNIVERSAL

12HEALTH SERVICES, INC., a

13Delaware corporation;

14AMERICAN NURSING

15SERVICES, INC., a

16Louisiana corporation;

17STEVEN DALE FARMER, an

18individual; DOES I

19through X, inclusive; and

20ROE CORPORATIONS I

21through X, inclusive,

22Defendants.

23-----

24DEPOSITION OF

25RENATO SUMERA, RN

Friday, May 1, 2015

9:30 a.m.

521 S. Third Street

Las Vegas, Nevada

Carol O'Malley, CCR 178, RMR

Page 2

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3EXAMINATION

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<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>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>
Page 6	Page 8
<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>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>

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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?

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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.

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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.

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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?

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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

Page 19

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.

Page 21

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

Page 23

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.

Page 24

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

Page 25

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:</p> <p>2 Q. I know. You've already said you don't</p> <p>3 remember.</p> <p>4 A. Right.</p> <p>5 Q. But aside from not remembering the</p> <p>6 conversations, do you have any reason to disagree</p> <p>7 with anything else she says in that statement?</p> <p>8 MR. BEMIS: Same objection.</p> <p>9 THE WITNESS: That's hard to answer.</p> <p>10 BY MR. MURDOCK:</p> <p>11 Q. Tell me why it's hard to answer.</p> <p>12 A. Because some of this conversation I don't</p> <p>13 remember.</p> <p>14 Q. I understand. And like I said, outside of</p> <p>15 you stating you don't remember, do you have any</p> <p>16 reason to disagree with what she said?</p> <p>17 A. No.</p> <p>18 Q. Thank you.</p> <p>19 MR. MURDOCK: I'll pass the witness.</p> <p>20</p> <p>21 EXAMINATION</p> <p>22 BY MR. SILVESTRI:</p> <p>23 Q. I'm just going to follow up on this</p> <p>24 statement, Mr. Sumera, since you've got it in front</p> <p>25 of you.</p>	<p style="text-align: right;">Page 91</p> <p>1 A. Why?</p> <p>2 Q. Yeah.</p> <p>3 A. Because there might be a procedure going</p> <p>4 on, for one thing.</p> <p>5 Q. Okay.</p> <p>6 A. They could be undressing -- the patient.</p> <p>7 Those are some things.</p> <p>8 Q. All right. Is it important for CNAs, as</p> <p>9 well as RNs like yourself, to be somewhat modest with</p> <p>10 their patients?</p> <p>11 A. Yes.</p> <p>12 Q. Be respectful, especially if you're a male</p> <p>13 nurse or a male CNA and you're going into a female's</p> <p>14 room?</p> <p>15 A. Yes.</p> <p>16 Q. And help me out. The ER at Centennial, at</p> <p>17 the time that you had this conversation with</p> <p>18 Ms. Wolfe, were there actual doors on the particular</p> <p>19 rooms where a patient would be, or were they just</p> <p>20 curtains?</p> <p>21 A. Some has doors, some has curtains.</p> <p>22 Q. So it was both?</p> <p>23 A. Yeah.</p> <p>24 Q. And would you expect a CNA to knock on a</p> <p>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</p> <p>2 believe you testified that Ms. Wolfe came to you and</p> <p>3 asked you to speak to Mr. Farmer about how he dealt</p> <p>4 with female patients generally, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And more specifically, this is where I'm</p> <p>7 not clear.</p> <p>8 Did she ask you to address with</p> <p>9 him how he dealt with female patients in attaching or</p> <p>10 not attaching, affixing, whatever, adjusting heart</p> <p>11 monitor leads?</p> <p>12 A. What I recall as far as talking to Mr.</p> <p>13 Farmer is make sure to knock before entering the room</p> <p>14 of the patient. To ask the nurse whether the patient</p> <p>15 needs the heart monitor on, or whether they need to</p> <p>16 be in a gown.</p> <p>17 So that's what I remember telling</p> <p>18 him.</p> <p>19 Q. So I want to just break it down.</p> <p>20 The first thing she asked you to</p> <p>21 address with him was to knock on the patient's door</p> <p>22 before entering.</p> <p>23 A. Yeah.</p> <p>24 Q. Why would a CNA knock on a patient's door</p> <p>25 before entering?</p>	<p style="text-align: right;">Page 92</p> <p>1 A. It's easy. Just knock on the side.</p> <p>2 Q. But to knock nonetheless?</p> <p>3 A. Knock, yeah.</p> <p>4 Q. For the same purposes that you just cited?</p> <p>5 A. Correct.</p> <p>6 Q. And the second thing that she asked you to</p> <p>7 instruct him was to ask the nurse -- I take it the</p> <p>8 registered nurse -- if a patient needed a heart</p> <p>9 monitor, before just going in and attaching one?</p> <p>10 A. That's what I told Steve, yeah.</p> <p>11 Q. That's what you told him?</p> <p>12 A. Yeah.</p> <p>13 Q. Did Ms. Wolfe ask you to tell him that?</p> <p>14 A. If I recall -- I don't remember exactly,</p> <p>15 but she told me to make sure that Steve knocks first.</p> <p>16 Like I said, to knock first and ask the nurse first.</p> <p>17 Q. And that was to ask the nurse first about</p> <p>18 what? What was he supposed to ask the nurse about?</p> <p>19 A. Whether the patient needs a heart monitor</p> <p>20 and/or put a gown on.</p> <p>21 Q. And/or put a gown on. Okay.</p> <p>22 Was Ms. Wolfe's request of you</p> <p>23 abnormal? Did that seem to fit the policy and</p> <p>24 procedures of Centennial Hills Hospital, to your</p> <p>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 STATE OF NEVADA)
2) ss.
3 COUNTY OF CLARK)
4 I, Carol O'Malley, Nevada Certified Court
5 Reporter 178, do hereby certify:
6 That I reported the taking of the deposition
7 of RENATO SUMERA, RN on May 1, 2015 commencing at the
8 hour of 9:30 a.m.;
9 That prior to being examined, the witness was by
10 me duly sworn to testify to the truth, the whole
11 truth, and nothing but the truth;
12 That I thereafter transcribed my said
13 shorthand notes into typewriting and that the
14 typewritten transcription of said deposition is a
15 complete, true, and accurate transcription of my said
16 shorthand notes taken down at said time. Review of
17 the transcript was requested.
18 I further certify that I am not a relative or
19 employee of an attorney or counsel involved in said
20 action, nor financially interested in said action.
21 IN WITNESS WHEREOF, I have hereunto set my hand
22 in my office in the County of Clark, State of Nevada,
23 this 5th day of May, 2015.
24 *Carol O'Malley*
25 Carol O'Malley, CCR No. 478

Page 157		Page 159	
<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>RENATO SUMERA, RN</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>RENATO SUMERA, RN</p> <p>25</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

PA2462

9/23/2009
04:20 PM

Universal Health Services
RISK MANAGEMENT WORKSHEET
CONFIDENTIAL INFORMATION

PAGE 2

For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

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
For Facility: CENTENNIAL HILLS HOSPITAL MEDICAL CENTER

PAGE 3

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:

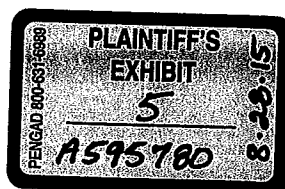
A57-0756
X

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.

///



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 ///

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;

26 ///

27 ///

28 ///

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).

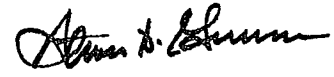
DATED this 2nd day of September, 2008.

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

* * *

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.

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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.

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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 28th 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 28th 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
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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 st	LAMPTON	CUNNINGHAM		KING
Start	End	Activity Performed			
0700		S/O LAMPTON, CUNNINGHAM AND SUPERVISOR KING ON DUTY. BRIEFED BY 3 rd 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 TRISIGNAL 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 TRISIGNAL 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 rd 4 th , 5 th , 6 th , 7 th AND 8 th FLOOR 3RD & 4 th 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

PA2400

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 201-532, 601-636, 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

Centennial Hills Hospital

MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05-14-08	2 ND	CUNNINGHAM	HAHN	CORRO	
Start	End	Activity Performed			
1500		S/O CORRO, S/O HAHN S/O CUNNINGHAM ON DUTY BRIEFED BY 1 ST SHIFT ON ALL SECURITY MATTERS OF THE DAY. ALL RADIOS AND KEYS TURNED OVER TO 2 ND 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 ND 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 RD , 4 TH , 5 TH , 6 TH , 7 TH AND 8 TH FLOOR 3RD & 4 TH 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. CODE 4.			
1810	1815	VALUABLES RETURN TO PATIENT [REDACTED]			
1815	1845	INTERIOR PATROL OF THE 3 RD , 4 TH , 5 TH , 6 TH , 7 TH AND 8 TH FLOOR 3RD & 4 TH FLOOR STORAGE AREAS PATIENT ROOMS 501-532 601-636 701-736 801-836 PUBLIC RESTROOMS PUBLIC WAITING AREAS AND ALL NURSES STATIONS.			

SDAL001402

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 ST , 2 ND , 3 RD , AND 4 TH 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 ND 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 ND 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 RD , 4 TH , 5 TH , 6 TH , 7 TH , AND 8 TH FLOOR 3RD & 4 TH 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

PA2404

Centennial Hills Hospital

MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
5/14/08	3 RD	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 ST 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 ND FLOOR WOMEN'S CENTER, MATERNITY, LABOR & DELIVERY, I & D WAITING AREA, ROOMS 201 TO 225, 5 TH FLOOR (IMG) ROOMS 501 TO 532, 6 TH FLOOR ROOMS 601 TO 636, 7 TH 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.			

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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 TH 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

Centennial Hills Hospital

MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05/16/08	1ST	NICHOLS	LAMPTON		KING
Start	End	Activity Performed			
0700		S/O LAMPTON, NICHOLS AND SUPERVISOR KING ON DUTY BRIEFED BY 3 RD 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 4201-228, THE 3 RD 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

PA2408

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.			
1740	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

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 ST , 2 ND , 3 RD AND 4 TH 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 ND 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 RD	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 (3) 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 TH 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 ND FLOOR WOMEN'S CENTER MATERNITY LABOR & DELIVERY L&D WAITING AREA ROOMS 201 TO 225 5 TH FLOOR (M/C) ROOMS 601 TO 632 6 TH FLOOR ROOMS 601 636 7 TH 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 ROOMBED # 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 TH 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 I.S. OFFICE FOR KAREN FROM I.S.
0700		S/O NICHOLS S/O LAMPTON AND S/O SUPERVISOR KING ON DUTY
	0730	S/O GORREO 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

PA2413

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 RD 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 () AS.			
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 RD , 4 TH , 5 TH , 6 TH , 7 TH AND 8 TH FLOOR AND 4 TH FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 601-635, 701-730, 801-835, PUBLIC RESTROOMS, PUBLIC WAITING AREAS AND AID 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.			

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		AND A STORAGE ROOM MAIN LOBBY ADMITTING CONCERGE HELP DESK PRE ADMIT TESTING DIAGNOSTIC IMAGING OUT PATIENT SURGERY OUT PATIENT WAITING AREA EFT 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 NORTHWESTER 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 RD 4 TH 5 TH 6 TH 7 TH AND 8 TH FLOOR 3RD & 4 TH 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 EFT 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 NORTHWESTER 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 RD 4 TH 5 TH 6 TH 7 TH AND 8 TH FLOOR 3RD & 4 TH 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 RD 4 TH 5 TH 6 TH 7 TH AND 8 TH FLOOR 3RD & 4 TH 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

Centennial Hills Hospital

MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
05/16/09	2 nd	CUNNINGHAM	ROSS	HAHN	
Start	End	Activity Performed			
1500		S/O HAHN, S/O ROSS, S/O CUNNINGHAM STEVE ON DUTY BRIEFED BY 1 st SHIFT ON ALL SECURITY MATTERS OF THE DAY. ALL RADIOS AND KEYS TURNED OVER TO 2 nd 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 nd , 3 rd , AND 4 th 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 rd , 4 th , 5 th , 6 th , 7 th , AND 8 th FLOOR. 3RD & 4 th 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 rd , 4 th , 5 th , 6 th , 7 th , AND 8 th FLOOR. 3RD & 4 th FLOOR STORAGE AREAS, PATIENT ROOMS 501-532, 601-636, 701-736, 801-836, PUBLIC			

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		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 ST , 2 ND , 3 RD AND 4 TH 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 ND 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 =

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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

Centennial Hills Hospital

MEDICAL CENTER

"SECURITY DAILY ACTIVITY LOG"

Date	Shift	Officer	Officer	Officer	Supervisor
3/16/08	3 RD	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 6. CONCIERGE OFFICE. MEDITATION ROOM. DIAGNOSTIC IMAGING CONSULTATION ROOM (1 ST 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 ND FLOOR WOMEN'S CENTER. MATERNITY. LABOR & DELIVERY. L & D WAITING AREA. ROOMS 201 TO 225. 5 TH FLOOR (IMC) ROOMS 501 TO 532. 6 TH FLOOR ROOMS 601 TO 636. 7 TH 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 6. CONCIERGE OFFICE. MEDITATION ROOM. DIAGNOSTIC IMAGING CONSULTATION ROOM (1 ST 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 ND FLOOR WOMEN'S CENTER. MATERNITY. LABOR & DELIVERY. L & D WAITING AREA. ROOMS 201 TO 225. 5 TH FLOOR (IMC) ROOMS 501 TO 532. 6 TH FLOOR ROOMS 601 TO 636. 7 TH 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			

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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

CASE NO.

**IN THE
SUPREME COURT OF NEVADA**

Electronically Filed
Aug 17 2016 08:56 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

**HALL PRANGLE & SCHOONVELD, LLC, MICHAEL PRANGLE,
ESQ., KENNETH M. WEBSTER, ESQ. AND JOHN F. BEMIS, ESQ.**

Petitioners,

vs.

**EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF CLARK,**

Respondent,

-and-

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

Real Party in Interest

District Court Case No.: A-09-595780-C

**PETITIONERS' APPENDIX TO
PETITION FOR EXTRAORDINARY WRIT RELIEF
VOLUME XII of XVII**

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APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF

VOLUME XII of XVII

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46	Plaintiff's Exhibit 1h – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Eighth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated April 22, 2015	PA2305-PA2315
47	Plaintiff's Exhibit 1i – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Ninth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 10, 2015	PA2316-PA2326
48	Plaintiff's Exhibit 1j – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Tenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 16, 2015	PA2327-PA2340
49	Plaintiff's Exhibit 1k – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Eleventh Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 17, 2015	PA2341-PA2354
50	Plaintiff's Exhibit 1l – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Twelfth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 10, 2015	PA2355-PA2369

51	Plaintiff's Exhibit 1m – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Thirteenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 13, 2015	PA2370-PA2384
52	Plaintiff's Exhibit 1n -- Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Fourteenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 20, 2015	PA2385-PA2399
53	Plaintiff's Exhibit 2 – Centennial Security Daily Activity Logs May 14-16, 2008	PA2400-PA2421
54	Plaintiff's Exhibit 3 – Deposition Transcript of Renato Sumera, RN taken on May 1, 2015	PA2422-PA2461
55	Plaintiff's Exhibit 4 – Universal Health Services Incident Report dated May 15, 2008	PA2462-PA2464
56	Plaintiff's Exhibit 5 – Complaint for Money Damages, Cagnina v. Centennial Hills Hospital Medical Center, et al., Case No. A570756, filed September 2, 2008 and First Amended Complaint for Money Damages, Cagnina v. Centennial Hills Hospital Medical Center, et al., Case No. A570756, filed April 28, 2010	PA2465-PA2489

APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF

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Defendant Universal Health Services, Inc.'s Answer to Plaintiff's Amended Complaint filed September 11, 2013	I	3	PA0013-PA0021
Defendants Centennial Hills Hospital and Universal Health Services, Inc.'s Errata to their Opposition to Plaintiff's Motion for Summary Judgment Re: Liability and Joinder to Defendant Steven Dale Farmer's Limited Opposition October 16, 2014	I	7	PA0113-PA0116
Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Brief in Support of Their Position Re: Evidentiary Hearing filed August 26, 2015	IV	20	PA0612-PA0735

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Motion for Reconsideration of this Court's November 4, 2015 Order filed November 19, 2015	VIII	25	PA1390-PA1589
Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Opposition to Plaintiff's Motion for NRCPC 37 Sanctions filed May 13, 2015	III	13	PA0469-PA0487
Defendant's Exhibit A – Las Vegas Metropolitan Police Dept. File	X & XI	35	PA1867-PA2050
Defendant's Exhibit A-1 (Pictures of Defendant Farmer)	XI	36	PA2244-PA2249
Defendant's Exhibit List from Vault	X	33	PA1863
Discovery Commissioner's Report and Recommendations filed August 19, 2015	IV	19	PA0605-PA0611
Evidentiary Hearing Brief in Support of the Striking of Defendant Centennial Hills Hospital's Answer to Plaintiff's Amended Complaint and Affirmative Defenses filed August 26, 2015	V	21	PA0736-PA0948
Notice of Entry of Order Denying Motion for Reconsideration filed December 11, 2015	X	30	PA1842-PA1847
Notice of Entry of Order on Plaintiff's Motion for Summary Judgment Re: Liability filed March 2, 2015	III	10	PA0352-PA0362
Notice of Entry of Order Striking Answer of Defendant Valley Health System LLC as Sanction for Discovery Misconduct filed November 5, 2015	VII	24	PA1348-PA1389
Notice of Entry of Stipulation and Order for Dismissal with Prejudice filed February 29, 2016	X	32	PA1854-PA1862

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Order Denying Motion for Reconsideration filed December 10, 2015	X	29	PA1839-PA1841
Order Denying Petition for Writ of Mandamus or Prohibition filed May 20, 2015	III	14	PA0488-PA0489
Order on Plaintiff's Motion for Summary Judgment Re: Liability filed February 27, 2015	III	9	PA0344-PA0351
Order Setting Evidentiary Hearing filed August 4, 2015	IV	18	PA0602-PA0604
Order Striking Answer of Defendant Valley Health System LLC as Sanction for Discovery Misconduct filed November 4, 2015	VII	23	PA1309-PA1347
Plaintiff's Exhibit 1 – Defendant Centennial Hills Hospital and Universal Health Services, Inc.'s Initial Early Case Conference List of Witnesses and Documents dated November 24, 2009	XI	37	PA2250-PA2254
Plaintiff's Exhibit 1 – Photo of Universal Health Services Address with Vault Exhibit Form	XI	38	PA2255-PA2256
Plaintiff's Exhibit 1a – Defendant Centennial Hills Hospital and Universal Health Services, Inc.'s First Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated April 16, 2010	XI	39	PA2257-PA2262
Plaintiff's Exhibit 1b – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Second Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated February 12, 2013	XI	40	PA2263-PA2269

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Plaintiff's Exhibit 1c – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Third Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated March 11, 2013	XI	41	PA2270- PA2275
Plaintiff's Exhibit 1d – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Fourth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated March 12, 2013	XI	42	PA2276- PA2281
Plaintiff's Exhibit 1e – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Fifth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated March 18, 2013	XI	43	PA2282- PA2288
Plaintiff's Exhibit 1f – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Sixth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 7, 2013	XI	44	PA2289- PA2296
Plaintiff's Exhibit 1g – 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	XII	45	PA2297- PA2304
Plaintiff's Exhibit 1h – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Eighth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated April 22, 2015	XII	46	PA2305- PA2315

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Plaintiff's Exhibit 1i – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Ninth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 10, 2015	XII	47	PA2316-PA2326
Plaintiff's Exhibit 1j – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Tenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 16, 2015	XII	48	PA2327-PA2340
Plaintiff's Exhibit 1k – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Eleventh Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated June 17, 2015	XII	49	PA2341-PA2354
Plaintiff's Exhibit 1l – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Twelfth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 10, 2015	XII	50	PA2355-PA2369
Plaintiff's Exhibit 1m – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Thirteenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 13, 2015	XII	51	PA2370-PA2384
Plaintiff's Exhibit 1n – Defendant Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center's Fourteenth Supplement to Its Initial Early Case Conference List of Witnesses and Documents dated July 20, 2015	XII	52	PA2385-PA2399

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Plaintiff's Exhibit 2 – Centennial Security Daily Activity Logs May 14-16, 2008	XII	53	PA2400-PA2421
Plaintiff's Exhibit 3 – Deposition Transcript of Renato Sumera, RN taken on May 1, 2015	XII	54	PA2422-PA2461
Plaintiff's Exhibit 4 – Universal Health Services Incident Report dated May 15, 2008	XII	55	PA2462-PA2464
Plaintiff's Exhibit 5 – Complaint for Money Damages, Cagnina v. Centennial Hills Hospital Medical Center, et al., Case No. A570756, filed September 2, 2008 and First Amended Complaint for Money Damages, Cagnina v. Centennial Hills Hospital Medical Center, et al., Case No. A570756, filed April 28, 2010	XII	56	PA2465-PA2489
Plaintiff's Exhibit 6 – Deposition Transcript of Christine Murray dated January 27, 2010	XIII	57	PA2490-PA2566
Plaintiff's Exhibit 7 – Deposition Transcript of Amy Bochenek dated March 10, 2010	XIII	58	PA2567-PA2589
Plaintiff's Exhibit 8 – Deposition Transcript of Amy Blasing, MSN, RN dated July 28, 2015	XIII	59	PA2590-PA2621
Plaintiff's Exhibit 9 – Rule 16.1 Mandatory Pretrial Discovery Requirements	XIII	60	PA2622
Plaintiff's Exhibit 10 – Public Defender's Office E-mails	XIV	61	PA2623-PA2757
Plaintiff's Exhibit 10a – Chronology of Public Defender's Office E-mails	XIV	62	PA2758-PA2790
Plaintiff's Exhibit 11 – Letter from Amy Feliciano to McBride, Bemis & Vogel dated January 31, 2013	XIV	63	PA2791
Plaintiff's Exhibit 12 – Notice of Entry of Order Re: Discovery Commissioner's Report and Recommendations dated May 6, 2013	XIV	64	PA2792-PA2804

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Plaintiff's Exhibit 13 – Christine Murray Voluntary Statement to Las Vegas Metropolitan Police Department dated June 13, 2008	XIV	65	PA2805-PA2820
Plaintiff's Exhibit 14 – Margaret Wolfe Voluntary Statement to Las Vegas Metropolitan Police Department dated May 30, 2008	XIV	66	PA2821-PA2834
Plaintiff's Exhibit 15 - Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Objection to Discovery Commissioner Report and Recommendation filed July 30, 2015	III	16	PA0566-PA0580
Plaintiff's Exhibit 16 – Defendant Valley Health Systems, LLC d/b/a Centennial Hills Hospital Medical Center's Motion for Protective Order filed June 19, 2013	XIV	67	PA2835-PA2850
Plaintiff's Exhibit 17 – Discovery Commissioner's Report and Recommendation filed September 4, 2013	XIV	68	PA2851-PA2856
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	PA0099-PA0112
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	PA0363-PA0406
Plaintiff's Exhibit 20 – Rule 3.3 Candor Toward Tribunal	XIV	69	PA2857

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
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	PA0581-PA0601
Plaintiff's Exhibit 22 – Deposition Transcript of Christine Murray dated January 8, 2015	XV	70	PA2858-PA2880
Plaintiff's Exhibit 23 – Deposition Transcript of Sajit Pullarkat dated August 7, 2015	XV	71	PA2881-PA2896
Plaintiff's Exhibit 24 – Deposition Transcript of PMK of Centennial Hills Hospital (Sajit Pullarkat) dated August 7, 2015	XV	72	PA2897-PA2908
Plaintiff's Exhibit 25 – Deposition Transcript of Janet Calliham dated August 18, 2015	XV	73	PA2909-PA2964
Plaintiff's Exhibit 26 – Deposition Transcript of Margaret Wolfe, RN dated May 5, 2015	XV	74	PA2965-PA2984
Plaintiff's Exhibit 27 – Defendant Valley Health System, LLC's Responses to Plaintiff's Eleventh Set of Interrogatories dated June 12, 2015	XV	75	PA2985-PA2989
Plaintiff's Exhibit 28 – Defendant Valley Health System, LLC's Responses to Plaintiff's Tenth Set of Interrogatories dated June 10, 2015	XV	76	PA2990-PA2993

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
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	PA2994-PA3185
Plaintiff's Exhibit 30 – Excerpts of Deposition of Carol Butler dated June 9, 2015	XVII	78	PA3186-PA3201
Plaintiff's Exhibit 31 – Excerpts of Deposition of Renato Sumera, RN dated May 1, 2015	XVII	79	PA3202-PA3213
Plaintiff's Exhibit 32 – Excerpts of Deposition of Margaret Wolfe, RN dated May 5, 2015	XVII	80	PA3214-PA3221
Plaintiff's Exhibit 33 – Excerpts of Deposition of Amy Blasing, MSN, RN dated July 28, 2015	XVII	81	PA3222-PA3246
Plaintiff's Exhibit 34 – Excerpts of Deposition of Christine Murray, RN dated January 8, 2015	XVII	82	PA3247-PA3251
Plaintiff's Exhibit List from Vault	X	34	PA1864-PA1866
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	PA0407-PA0468
Plaintiff's Motion for Summary Judgment Re: Liability filed September 29, 2014	I	4	PA0022-PA0093

<u>Document Title:</u>	<u>Volume No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
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	PA1590-PA1821
Reply in Support of Motion for Reconsideration filed December 4, 2015	X	28	PA1825-PA1838
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	PA0490-PA0565
Reply to Defendants' Oppositions to Plaintiff's Motion for Summary Judgment Re: Liability filed November 21, 2014	II	8	PA0117-PA0343
Reporter's Transcript of Evidentiary Hearing and Motions held on August 28, 2015	VI & VII	22	PA0949-PA1175
Stipulation and Order for Dismissal with Prejudice filed February 29, 2016	X	31	PA1848-PA1853
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	PA3252-PA3305

TAB 45

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

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Nevada Bar No. 8619

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1160 North Town Center Drive, Suite 200

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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

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 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 ...

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 6th 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 5th 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
9 (Exhibit K)
- 10 12. Privilege Log for Schedule of Steven Dale Farmer
11 (Exhibit L)
- 12 13. Schedule of Steven Dale Farmer at Centennial Hills Hospital on May 14, 2008
13 bates labeled CHH00322 – CHH00325
(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 27th 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
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
10 and investigation performed by the California Board of Nursing prior to CNA certification. The
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12 Revocation of Steven Dale Farmer's CNA Certificate (Home Health Certificate Number
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- 13 6. Collado Jeunnesse, RN
14 Kim Moon, RN
15 Abraham Deppa, CNA
16 Nikki Carter, CNA
17 Marina McDowell, CNA
18 Alana Schons, CNA
19 Nelina Arante, RN
20 Ronald Lodevico
Venise Abelard, CNA
Paula Mosley, RN
Pamela Flagg, CNA
Amber Vergara
Loretta Korinis
Michelle Lucas

21 The above identified nurses and certified Nurses' Assistants are expected to testify as to
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
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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 Canque
(702) 301-0433

16. Asuncion Layug
6628 MacDoogie Street
Las Vegas, NV 89166
Ph: (702) 405-7919

17. Alexe Brown-Gay
5973 Spinnaker Point Avenue
Las Vegas, NV 89110
Ph: (702) 438-2860

18. Emma Cortez
1835 Pallid Swift Court
North Las Vegas, NV 89084
Ph: (702) 292-8330

19. Maria Dakudo
5201 Meadows Lily Avenue
Las Vegas, NV 89108
Ph: (702) 545-0938

20. Janette Luoang
455 E. Twain Avenue, #144
Las Vegas, NV 89169
Ph: (213) 839-3915

21. Tiffiney Bills
4230 Valley Regents Drive
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 90th 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

///

///

- 1 31. Schuele
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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
19 floor in February and/or March of 2008, and may have knowledge and information about
20 the alleged incident with the elderly patient to which Nurse Murray referred in her
21 deposition testimony. Defendant has provided the foregoing individuals' last known
22 contact information, and has made efforts to verify the accuracy of such contact
23 information to the best of its ability.

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

3 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).
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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).
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Bates Numbered Unit Coord/C N A -- 1 -8 (Exhibit D on attached CD).
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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)
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(Exhibit Q)
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CCAMH00001 – CCAMH00022 (Exhibit R attached hereto via CD)
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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)

///

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- 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
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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
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21
22
23
24
25
26
27
28

other party to this litigation.

DATED this 22nd 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 22nd 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

4833-3895-2992, v. 1

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
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
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).
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Amber Vergara
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Michelle Lucas

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22 the care and treatment rendered as well as the facts and circumstances surrounding this matter.

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

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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

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Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter.

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5336 Fireside Ranch Ave.
Las Vegas, NV 89131

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- 14 35. Vicky Johnson, former Director of Nursing
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c/o John F. Bemis, Esq.
HALL PRANGLE & SCHOONVELD, LLC
1160 North Town Center Drive, Suite 200
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11. Schedule of Steven Dale Farmer at Centennial Hills Hospital from April 13, 2008 through June 7, 2008 bates labeled CHH00318 – CHH00321 (Exhibit K)
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 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.

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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 10th 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 10th 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.
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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

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1160 North Town Center Drive, Suite 200

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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
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
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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
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- 12 6. Collado Jeunesse, RN
13 Kim Moon, RN
14 Abraham Deppa, CNA
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17 Alana Schons, CNA
18 Nelina Arante, RN
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Michelle Lucas

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22 the care and treatment rendered as well as the facts and circumstances surrounding this matter.

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24 Cobinder S. Chopra, M.D.
25 James E. Mock, M.D.

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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
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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.

- 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
6 June 2008, and therefore, may have knowledge and information about the facts and
7 circumstances 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
13 2008, and therefore, may have knowledge and information about the facts and
14 circumstances 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)
20 during the time period of February through June 2008, and therefore, may have knowledge
21 and information about the facts and circumstances surrounding this matter.

- 22 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
27 night) during the time period of February through June 2008, and therefore, may have
28 knowledge and 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)
34 during the time period of February through June 2008, and therefore, may have knowledge
35 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.

- 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)
6 during the time period of February through June 2008, and therefore, may have knowledge
7 and 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
14 have knowledge and information about the facts and circumstances surrounding this
15 matter.

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

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

- 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

29 The above-named individuals, Parejas - Cronister (#36-45), are current employees of
30 Defendant, Valley Health System, LLC, and have been identified by Defendant as having
31 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 6th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5th 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. 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 16th 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

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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

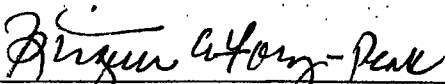
I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 16th day of June, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC d/b/a CENTENNIAL HILLS HOSPITAL MEDICAL CENTER'S TENTH SUPPLEMENT TO IT'S INITIAL EARLY CASE CONFERENCE LIST 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

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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
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SUPP
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mprangle@hpslaw.com
jbemis@hpslaw.com
Attorneys for Defendant
Valley Health System, LLC d/b/a
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DISTRICT COURT
CLARK COUNTY, NEVADA

MISTY PETERSON, AS SPECIAL
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JANE DOE,

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HILLS HOSPITAL MEDICAL CENTER;
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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
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c/o Robert C. McBride, Esq.
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Executive Director
Nevada State Board of Nursing
5011 Meadowwood Mall Way, Suite 300
Reno, NV 89502-6567

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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

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10 Certification Process for a Certified Nurses Assistant. The Certification Process for Steven D.
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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
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4 c/o LEWIS BRISBOIS BISGAARD & SMITH
5 6385 South Rainbow Blvd., Suite 600
6 Las Vegas, NV 89118

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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
1160 North Town Center Drive, Suite 200
Las Vegas, NV 89144

6 Mr. Sparacino is expected to testify as to the facts and circumstances surrounding this
7 matter.

8 15. Nida Ibasco Canque, RN
9 7940 Quail Breast Lane
10 Las Vegas, NV 89131
(This is last known address)

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

13 16. Asuncion Layug, RN
14 8920 Rendon Street
15 Las Vegas, NV 89143
(This is last known address)

16 Nurse Layug was a night-shift nurse during the time period of February through June
17 2008, and therefore, may have knowledge and information about the facts and circumstances
18 surrounding this matter.

19 17. Alxenia Priscilla Brown-Gay, RN
20 5973 Spinnaker Point Avenue
21 Las Vegas, NV 89110
(This is last known address)

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

24 ///

25 ///

26 ///

27 ///

28 ///

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
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 (This is last known address)

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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 6th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5th 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)
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 17th 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 17th 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
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 ...

- 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.
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Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter.

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

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1835 Pallid Swift Court
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(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.

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(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.

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(This is last known address)

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(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.

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(This is last known address)

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12338 Holly Jane Court
Orlando, FL 32824
(This is last known address)

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- 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
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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
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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.

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4 *(This is last known address)*

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10 Daly City, CA 94015
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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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- 25 2. Centennial Hills Hospital Daily Security Logs
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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 10th 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 10th 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

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**



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 Thirteenth 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
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
 (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.

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

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

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

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

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

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

36. Lilibeth Parejas, RN
37. Bernadine Rebogio, RN
38. Janice Collado, RN
39. Darlene Infante Carbonell, RN
40. Maria Dacquell, CNA
41. Rhona Lopez
42. Aman McPherson
43. Ailynne Belbis
44. Larena Abdul
45. Rebecca Cronister
c/o John F. Bemis, Esq.
HALL PRANGLE & SCHOONVELD, LLC
1160 North Town Center Drive, Suite 200
Las Vegas, NV 89144

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

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

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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)
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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)
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(Exhibit JJ attached hereto and bates labeled PtRelations0001-0009)
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38. Risk Events
(Exhibit LL attached hereto and bates labeled RiskEvents0001-0026)
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40. Grievance Log
(Exhibit NN attached hereto and bates labeled Grievance0001-0018)
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)

///

///

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 13th 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 13th 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
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LAS VEGAS, NEVADA 89144
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SUPP

MICHAEL E. PRANGLE, ESQ.
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mprangle@hpslaw.com
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.

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4
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

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

- 9
10
9. Crystal Johnson
4650 North Rainbow Blvd., #2109
Las Vegas, NV 89108
714-580-5383

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

- 13
14
15
10. Douglas Nichols
c/o John F. Bemis, Esq.
HALL PRANGLE & SCHOONVELD, LLC
1160 North Town Center Drive, Suite 200
Las Vegas, NV 89144

16 Mr. Nichols is expected to testify as to the facts and circumstances surrounding this
17 matter.

- 18
19
11. Mary Jo Solon
Southwest Medical Associates

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

- 21
22
23
12. Matthew Ross
Rawson-Neal Psychiatric Hospital
1650 Community College Dr.
Las Vegas, NV 89146

24 Mr. Ross is expected to testify as to the facts and circumstances surrounding this matter.

- 25
26
27
28
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
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.

- 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 Alburan
9 10 Forest Grove Drive, #21
10 Daly City, CA 94015
11 *(This is last known address)*

12 Nurse Alburan 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 6th Floor dated 05/13/2008 – 05/18/2008. Bates Numbered ASSIGN000001 – 000012 (Exhibit E)
6. Critical Care Services Assignment Sheets for the 5th 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)
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)
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- 1 30. Centennial Hills Hospital Managerial Hierarchy Chart
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23 Hospital Medical Center (Exhibit OO attached hereto and bates
24 Labeled BHCQ0001-0038)
- 25 42. Privilege Log Regarding Incident Report (Exhibit PP attached hereto)
- 26 43. Centennial Hills Hospital Incident Report
27 (Exhibit QQ attached hereto and bates labeled
28 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 20th 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 20th 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
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Attorneys for Plaintiff

Eckley M. Keach, Esq.
ECKLEY M. KEACH, CHTD.
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Attorneys for Plaintiff

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Robert C. McBride, Esq.
CARROL, KELLY, TROTTER,
FRANZEN, MCKENNA & PEABODY
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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

4827-3732-5862, v. 1

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