

**CASE NO.**

---

**IN THE  
SUPREME COURT OF NEVADA**

---

**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 XVII of XVII**

---

---

DENNIS L. KENNEDY,  
NEV. BAR NO. 1462  
JOSEPH A. LIEBMAN,  
NEV. BAR NO. 10125  
JOSHUA P. GILMORE,  
NEV. BAR. NO. 11576

**BAILEY ♦ KENNEDY**

8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148  
TELEPHONE: (702) 562-8820  
FACSIMILE: (702) 562-8821

DKENNEDY@BAILEYKENNEDY.COM  
JLIEBMAN@BAILEYKENNEDY.COM  
JGILMORE@BAILEYKENNEDY.COM

MICHAEL E. PRANGLE,  
NEV. BAR NO. 8619  
KENNETH M. WEBSTER,  
NEV. BAR NO. 7205  
JOHN F. BEMIS,  
NEV. BAR NO. 9509

**HALL PRANGLE & SCHOONVELD,  
LLC**

1160 N. TOWN CENTER DRIVE, STE. 200  
LAS VEGAS, NEVADA 89144  
TELEPHONE: 702.889.6400  
FACSIMILE: 702.384.6025  
MPRANGLE@HPSLAW.COM  
KWEBSTER@HPSLAW.COM  
JBEMIS@HPSLAW.COM

*Attorneys for Petitioners*

**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

**VOLUME XVII of XVII**

**TABLE OF CONTENTS**

<b><u>Tab No.</u></b>	<b><u>Document Title:</u></b>	<b><u>Page Nos.:</u></b>
78	Plaintiff's Exhibit 30 – Excerpts of Deposition of Carol Butler dated June 9, 2015	PA3186- PA3201
79	Plaintiff's Exhibit 31 – Excerpts of Deposition of Renato Sumera, RN dated May 1, 2015	PA3202- PA3213
80	Plaintiff's Exhibit 32 – Excerpts of Deposition of Margaret Wolfe, RN dated May 5, 2015	PA3214- PA3221
81	Plaintiff's Exhibit 33 – Excerpts of Deposition of Amy Blasing, MSN, RN dated July 28, 2015	PA3222- PA3246
82	Plaintiff's Exhibit 34 – Excerpts of Deposition of Christine Murray, RN dated January 8, 2015	PA3247- PA3251
83	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	PA3252- PA3305

## **APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

### **ALPHABETICAL INDEX**

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Amended Complaint filed August 21, 2009	I	2	PA0007-PA0012
Complaint filed July 23, 2009	I	1	PA0001-PA0006
Defendant American Nursing Services, Inc.'s Joinder to Plaintiff's Opposition to Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Motion for Reconsideration of this Court's November 4, 2015 Order filed December 4, 2015	X	27	PA1822-PA1824
Defendant Steven Dale Farmer's Limited Opposition to Plaintiff's Motion for Summary Judgment Re: Liability filed October 13, 2014	I	5	PA0094-PA0098
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



<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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

<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's Exhibit 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



<b><u>Document Title:</u></b>	<b><u>Volume No.:</u></b>	<b><u>Tab No.:</u></b>	<b><u>Page Nos.:</u></b>
Plaintiff's 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 78

DISTRICT COURT  
CLARK COUNTY, NEVADA

ESTATE OF JANE DOE, by and	)	
through its Special	)	Case No.
Administrator, Misty	)	09-A-0595780-C
Petersen,	)	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.	)	

DEPOSITION OF CAROL BUTLER  
June 19, 2015



1 asleep.

2 Q I know that, but you can go pick up the  
3 phone and call them; right? There's nothing stopping  
4 you from doing it?

5 A Not necessarily. I -- again, they're  
6 night shift people. They are home asleep, so --

7 Q You didn't want to bother their sleeping  
8 to ask them about what might have occurred that night?  
9 That's what you're telling us?

10 A Like I said, this was a police  
11 investigation.

12 Q I know. It happened at your hospital  
13 where you're the director of nursing. You're in charge  
14 of the nurses. So what I'm trying to find out is what  
15 you did specifically and what you didn't do. Okay?

16 A I contacted Amy Bochenek to ask if she  
17 had heard anything -- if there were any concerns  
18 expressed to her.

19 Q Okay.

20 A We did talk to the staff that were on  
21 shift. I don't recall if we talked to them at that  
22 time or later.

23 Q Okay. How did you talk to them?

24 A I -- I don't recall if it was --

25 Q You were in a conference room. Does

1 that refresh your recollection?

2 A -- in person or on the phone.

3 Q Do you remember you were in a conference  
4 room with them?

5 A No. I don't.

6 Q Okay. Who did you speak with? Can you  
7 name me some of them?

8 A I can't.

9 Q Did you speak with Ray Sumera?

10 A I don't recall.

11 Q Do you know who Ray Sumera was?

12 A I do know Ray.

13 Q What was Ray?

14 A Ray was one of our charge nurses in the  
15 emergency department.

16 Q Okay. And Ray, wouldn't he have been  
17 one of the people that you would normally talk to,  
18 assuming he was there that night?

19 A If he was on shift; yes.

20 Q Right. Okay. Margaret Wolfe? You  
21 might want to talk to her; right?

22 A If she was on shift --

23 Q Okay.

24 A -- that day.

25 Q Okay. And so if these people were on

1 shift, am I correct that you did talk to them? You  
2 believe you talked to them at least?

3 A I believe so.

4 Q Okay. And when you talked to them, did  
5 you write notes about that?

6 A I don't recall.

7 Q I'm -- I'm trying to figure out how you  
8 cannot recall whether or not you took notes from  
9 conversations with staff members. How is that  
10 possible?

11 MR. PRANGLE: Objection. Argumentative.

12 A How many years ago was this?

13 Q (BY MR. MURDOCK) Oh, so, again, if I  
14 asked you five years ago, you might have a better  
15 answer; right? Your memory?

16 A Certainly.

17 Q So I guess you went home that night;  
18 right?

19 A Eventually, I'm sure I did.

20 Q Okay. By the way, that entire day, did  
21 you ever go look to see if there was a policy and  
22 procedure that you should follow?

23 A I don't recall.

24 Q That entire day, did you ever go speak  
25 with Ms. Cagnina?



1 you can't tell me whether you wrote stuff down or  
2 didn't write stuff down?

3 A If it was something that needed to be  
4 documented for later reference, it was put in a  
5 document and sent to the quality/risk manager.

6 Q Okay. So, for example, your  
7 conversations with Ray Sumera --

8 A I would not have written that on my  
9 legal pad and thrown it away.

10 Q Why not?

11 A What I would have written on my legal  
12 pad is call Amy to arrange a meeting with the staff  
13 that were involved, and when that meeting was arranged,  
14 I would have checked it off. That would have been  
15 thrown away.

16 Q Okay.

17 A The contents of the meeting would have  
18 been documented and sent to the correct people for  
19 permanent record.

20 Q Okay. Would it have mentioned any names  
21 at all?

22 A On my legal pad?

23 Q Yeah.

24 A Only if I wanted to be sure certain  
25 people were invited to the meeting.

1 Q Sure. But, as you sit here today --

2 A But if the meeting had been documented,  
3 the attendees of the meeting would have been in that  
4 document.

5 Q As we sit here today, you can't tell me  
6 what you wrote down, what you didn't write down? You  
7 can tell me general descriptions of what you believe  
8 you wrote down, but you can't tell me exactly what was  
9 written down; correct?

10 A I could tell you absolutely that if I  
11 had written anything on a legal pad that was of any  
12 consequence to this case or of a confidential nature,  
13 it would have gone in the shredder; not the trash.

14 Q Okay.

15 A I can also guarantee you that if I  
16 needed to document anything for the permanent record,  
17 that was done. Not on my legal pad.

18 Q So it's possible you wrote something  
19 down on the legal pad, but you shredded it because it  
20 had names on it; right? Am I correct?

21 A I guess it's possible.

22 Q Well, isn't it your habit? Your  
23 habit -- habit, routine is, basically, to write things  
24 down that are important to you, and if it's got names  
25 on it, you shred it; right?



1 investigation under patient safety; is that correct?

2 A Correct.

3 Q Okay. Are you back and forth from

4 Sitka?

5 A Yes.

6 Q How often?

7 A Every other weekend.

8 Q Oh, okay, good. Just in case.

9 Okay. So you -- do you, by the way,

10 present at the internal investigation? Is that

11 something that you did? Was there actual committee

12 meetings?

13 A There was a meeting to review the

14 incident.

15 Q Okay. When was it?

16 A I don't recall.

17 Q Can you give me an estimate as to when

18 it was?

19 A To my recollection, it was within a few

20 days.

21 Q Okay. That would have been, I assume,

22 after you spoke with all of the staff who was on duty

23 that night; is that correct?

24 A I believe that we had spoken with

25 everyone that was present at that time before that

1 meeting.

2 Q Okay. When you say "everyone that was  
3 present," everyone that was present in the E.R. that  
4 night on the sixth floor, or what are we talking about?

5 A I believe we talked to staff in the E.R.  
6 and on the sixth floor. If I -- if I remember  
7 correctly, there was an allegation that there was  
8 inappropriate contact in the E.D. and then again on the  
9 sixth floor, and so we wanted to know if anyone had  
10 seen or heard anything.

11 Q And the inappropriate contact in the  
12 E.D. was what?

13 A I don't recall specifically.

14 Q Was it with Ms. Cagnina, or was it with  
15 Ms. Hanna?

16 A The -- with Ms. Cagnina.

17 Q Okay. So you would have spoken to all  
18 staff in the emergency department from that night; is  
19 that correct?

20 A Myself or Amy Bochenek.

21 Q Okay. Did you meet with them together?

22 A I don't recall.

23 Q Did you ever meet with them with a  
24 lawyer?

25 A I don't believe so.

1 and the quality and risk manager at the time --

2 Q Okay.

3 A -- if there were people who had  
4 knowledge of these incidents or had witnessed anything  
5 that had not come forward to raise the red flag, and  
6 what I was told was that no, no one had witnessed  
7 anything and that no one had knowledge of inappropriate  
8 actions on his part.

9 Q Well, in May of 2008, Ms. Wolfe gave a  
10 statement to the Las Vegas Metropolitan Police  
11 Department. Are you aware of that?

12 A I think I became aware of it at some  
13 point. Someone informed me of that.

14 MR. SILVESTRI: Can you read back the  
15 question, please? I'm sorry.

16 (The referred-to question was read by  
17 the reporter.)

18 MR. SILVESTRI: And the answer?

19 (The referred-to answer was read by the  
20 reporter.)

21 Q (BY MR. MURDOCK) When was that?

22 MR. PRANGLE: Again, he doesn't want to  
23 know anything that I told you.

24 Q (BY MR. MURDOCK) Not in the past couple  
25 of weeks, but before the past couple weeks, were you



1 aware of that?

2 A I think someone told me after she gave a  
3 statement that a statement had been made.

4 Q Okay. Did you ever talk to her about  
5 the statement?

6 A I don't recall talking to her about the  
7 statement.

8 Q But you knew she had given a statement?  
9 It was pretty close to the time that she gave a  
10 statement; correct? I mean, she gave it to -- if she  
11 gave it on May 30, 2008, would you agree with me that  
12 you found out that she gave a statement about the  
13 incident, let's say, by August 1, 2008? Would that  
14 make sense?

15 A Probably.

16 Q Okay. That would make sense; right?

17 A Yes.

18 Q It's more likely than not; correct?

19 A Correct.

20 Q Okay. Ms. Wolfe stated in her statement  
21 Ray Sumera had told me to watch Steve Farmer around her  
22 female patients. Do you remember that?

23 A No. I do not.

24 Q She said that Ray Sumera was concerned  
25 because he was very overly attentive to female patients

1 and very anxious to connect them to the monitors and  
2 disconnect -- and disconnect them from the monitors,  
3 which would require him to reach into their clothing.

4 Are you aware of that?

5 A No.

6 Q Okay. You never asked to see the  
7 statement; right?

8 A No, I did not.

9 Q But you knew she had made a statement;  
10 right?

11 A I knew she had made a statement.

12 Q By August 1 of 2008, you knew she had  
13 made a statement?

14 A Sure.

15 (There was a discussion off the record.)

16 Q (BY MR. MURDOCK) Do you know what a  
17 shift report is?

18 A Yes.

19 Q Were there notes taken at shift reports?

20 A Yes.

21 Q What happens to those notes? Are they  
22 thrown out?

23 A Usually, at the end of the shift.

24 Q They're thrown out?

25 A Because they are notes simply from one

1 pre-huddle?

2 A There was a handoff between the two  
3 charge nurses.

4 Q That's what it's called? The handoff?

5 A Uh-huh.

6 Q Okay. Try and let me finish my  
7 question. I know you're anticipating it, but our court  
8 reporter -- we're going to try and be kind to her  
9 without taking down two of us speaking at the same  
10 time.

11 The statement that -- that Ms. Wolfe  
12 gave that somebody told you about -- I mean, they told  
13 you she gave a statement to the police; right?

14 A Correct.

15 Q And it just -- you would ask -- wouldn't  
16 you ask your nurses, What did you talk to the police  
17 about?

18 A I asked Amy Bochenek and -- because my  
19 concern was, again, did someone know something prior to  
20 this. Her response to me was that Margaret had some  
21 vague concerns about him being overly attentive to  
22 women. And again, I said, Okay, who did she tell?  
23 And --

24 Q Did she tell you she told the police?

25 A I asked Amy, Did you ever hear about



1 this prior to this? And she said no.

2 Q She told you she told the police? Amy  
3 said that?

4 MR. PRANGLE: Amy said Amy told the  
5 police?

6 Q (BY MR. SILVESTRI) Did Amy tell you  
7 that Margaret told the police that?

8 A Amy told me that Margaret had made that  
9 statement to her.

10 Q Oh, to her. Okay. And did she tell you  
11 when she had made that statement to Amy?

12 A It was after Ms. Cagnina had complained  
13 and we had already started the police investigation.  
14 So -- and that was my question to Amy was had you ever  
15 heard about any of this prior to this? And she said  
16 no.

17 Q Was there some reason you didn't just  
18 call Ms. Wolfe in and ask her directly? You're the  
19 director of nursing.

20 A Again, the internal investigation was  
21 being handled by -- by risk and quality management.

22 Q But this was a different investigation,  
23 wasn't it? This was concerns that, now, you're hearing  
24 that one of your nurses have and you're the director of  
25 nursing. Would it not have been appropriate for you

1 to -- either yourself go to Ms. Wolfe, or call the risk  
2 manager and both of you go and talk to Ms. Wolfe?

3 A I don't know because I don't recall if  
4 Ms. Wolfe was involved in the meetings that we were  
5 having to -- to investigate or not.

6 Q Was -- did -- did you ever take  
7 Ms. Bochenek's statement to you to the risk manager?

8 A I don't recall. I know the risk manager  
9 spoke with Amy directly.

10 Q That wasn't my question. My question  
11 was is Ms. Bochenek comes and tells you that one of  
12 your nurses has come and talked to the cops -- excuse  
13 me -- has said that a nurse has concerns about  
14 Mr. Farmer. Did you take that statement to the risk  
15 manager?

16 A I don't recall.

17 Q That wasn't something you would have  
18 written up and sent up the line of command?

19 A It -- it completely depends on how that  
20 information was conveyed to me.

21 Q Okay. Mr. Murdock asked you some  
22 questions about whether you would want to know if a  
23 particular nurse or CNA was being overly attentive with  
24 respect to female patients. Do you remember that line  
25 of questioning?



1 with. Everything, again, that needed to be recorded.

2 Q Would have been put where?

3 A Was put in the document and given to the  
4 risk manager.

5 Q What was the document titled that you  
6 gave her?

7 MR. PRANGLE: Well, I'm not sure we've  
8 established yet she gave anything.

9 MR. MURDOCK: She just said she gave a  
10 document.

11 MR. PRANGLE: If she did something,  
12 that's what she would have done with it. I think she  
13 told you a half hour ago, she doesn't remember doing  
14 it.

15 Q (BY MR. MURDOCK) So you don't remember  
16 doing anything with any of these people: Ray Sumera,  
17 Margaret Wolfe, anybody?

18 A I know I had conversations with people,  
19 but I can't tell you exactly who and I can't tell you  
20 the content of that.

21 Q Of course, if I asked you five years  
22 ago, you might have been able to tell me?

23 A My memory would have been better, yes.

24 Q Okay. So -- and had you had  
25 conversations with these people, you would have written

1 their names on a document and then transferred that to  
2 the quality and risk people; correct?

3 A Correct.

4 Q Okay. When you were at Centennial Hills  
5 Hospital, did you keep a calendar?

6 A Yes.

7 Q Did Ms. Antoinette keep your calendar?

8 A Yes, she did.

9 Q Was it electronic?

10 A Yes.

11 Q And on your calendar, did you have, for  
12 instance, if you were going to meet with Ray Sumera,  
13 would that be on your calendar? If you were going to  
14 meet with Ray Sumera at 2:00, would that be on your  
15 calendar?

16 A Potentially.

17 Q Oh, is it more likely than not that  
18 that's what happened?

19 A Not necessarily. If Ray was -- if Ray  
20 made an appointment to come to my office to meet with  
21 me, then, yes, it would be on my calendar. If I walked  
22 down to the emergency department and had a conversation  
23 with Ray, no, it would not be on my calendar.

24 Q Unless it was on your calendar for you  
25 to walk down and see Ray?

TAB 79

DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

vs.

CASE NO. 09-A-595780

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.  
~~~~~

DEPOSITION OF

RENATO SUMERA, RN

Friday, May 1, 2015

9:30 a.m.

521 S. Third Street

Las Vegas, Nevada

Carol O'Malley, CCR 178, RMR



800.211.DEPO (3376)  
EsquireSolutions.com

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.



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?

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.

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



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.

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.



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.

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.



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.

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.

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,

TAB 80



DISTRICT COURT

CLARK COUNTY, NEVADA

JANE DOE,

Plaintiff,

vs.

CASE NO. 09-A-595780

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.  
~~~~~

DEPOSITION OF

MARGARET WOLFE, RN

Wednesday, May 5, 2015

9:30 a.m.

521 S. Third Street

Las Vegas, Nevada

Carol O'Malley, CCR 178, RMR3



800.211.DEPO (3376)  
EsquireSolutions.com

1 Q. Who is he?

2 A. He was a CNA that worked at Centennial  
3 Hospital at the same time I was there.

4 Q. What did he look like?

5 A. Poppa Smurf. Sorry. He had a white beard,  
6 white hair, medium stature.

7 Q. Did you give a statement to the police a  
8 couple days -- well, actually it would have been  
9 maybe a couple weeks after he was arrested, in 2008?

10 A. Yes.

11 Q. Did you lie to the police?

12 A. No.

13 Q. Did you make up any stories to tell the  
14 police?

15 A. No.

16 Q. After you spoke with the police, did you  
17 speak with anybody at Centennial Hills Hospital about  
18 what you told the police?

19 A. I don't recall.

20 Q. Who was your director of nursing at the  
21 time? Do you remember?

22 A. Amy Bochenek.

23 Q. That's how you pronounce it?

24 A. (Witness nods.)

25 Q. Is that a yes?



1 A. Yes.

2 Q. Now, do you recall speaking with Amy --

3 A. Yes.

4 Q. I'm sorry, let me finish my question.

5 A. Okay.

6 Q. The only reason is, she's going to get mad  
7 at me.

8 Do you recall speaking with Amy  
9 about Mr. Farmer?

10 A. Yes.

11 Q. Was that before or after he was arrested?

12 A. It was after, because the situation  
13 happened on the same day.

14 Q. Right. Okay. And you went to Amy to  
15 discuss the situation with Ms. Hanna, is that  
16 correct?

17 A. I didn't go directly to Amy, no.

18 Q. Who did you go to?

19 A. I went to my charge nurse that was on that  
20 shift.

21 Q. Who was that, by the way?

22 A. Ray Sumera.

23 Q. Now, Ray testified the other day that he  
24 was a relief charge nurse.

25 A. Uh-huh.



1 Q. Is that a yes?

2 A. Yes.

3 Q. What is a relief charge nurse?

4 MR. BEMIS: I object to form. Go ahead  
5 and answer.

6 THE WITNESS: A relief charge nurse  
7 fills in when the permanent charge nurse is not  
8 available.)

9 BY MR. MURDOCK:

10 Q. Okay. Why did you go to Ray to talk about  
11 that incident?

12 A. Because that's my chain of command that I  
13 would follow.

14 Q. Have you seen the transcript of the  
15 conversation you had with Detective Saunders?

16 A. Yes.

17 Q. Do you recall any mistakes in that  
18 transcript?

19 A. No.

20 Q. So you went to Ray because of the chain of  
21 command. After you went to Ray, did you go to  
22 somebody else?

23 A. Yes.

24 Q. Is that when you went to Amy?

25 A. No.





1 Q. Who did you go to?

2 A. I spoke with the nurse that I was giving  
3 report to at shift change.

4 Q. Who was that? Do you remember?

5 A. Her name is Julie. I don't remember her  
6 last name.

7 Q. And when did you wind up speaking with Amy?

8 A. Later that day she called me.

9 Q. So somehow it got back up to her?

10 A. Yes.

11 Q. Were you at home at the time?

12 A. Yes.

13 Q. And my guess is that you repeated  
14 everything you told Ray, correct?

15 A. Yes.

16 Q. And also everything you told Julie,  
17 correct?

18 A. Correct.

19 Q. Did you lie to them?

20 A. No.

21 Q. Prior to the day you spoke with Amy and the  
22 day you spoke with Julie, and the day you spoke with  
23 Ray when the incident with Ms. Hanna occurred, had  
24 you ever spoken to anybody before about Mr. Farmer?

25 A. Yes.



800.211.DEPO (3376)  
EsquireSolutions.com

1 Q. And my understanding is that at some point,  
2 I want to say -- I could be wrong, but in the summer  
3 of 2009, you were terminated by Centennial, is that  
4 correct?

5 A. Yes.

6 Q. In between the time you were terminated and  
7 the Denise Hanna incident, do you recall having any  
8 conversations with anybody at Centennial Hills  
9 Hospital regarding Steven Farmer?

10 MR. BEMIS: Besides what she already  
11 testified to?

12 MR. MURDOCK: Yeah.

13 THE WITNESS: Again, all the nursing  
14 staff was talking about it, following the case. So I  
15 may have. I don't remember any specific  
16 conversations with people, but it's possible.

17 BY MR. MURDOCK:

18 Q. Were you ever called in, for instance by  
19 risk management, to discuss what you had witnessed  
20 with Mr. Farmer?

21 A. No.

22 Q. Did any lawyers ever speak with you  
23 regarding Mr. Farmer?

24 A. No.

25 Q. When was the first time a lawyer ever spoke



800.211.DEPO (3376)  
EsquireSolutions.com

1 with you regarding Mr. Farmer?

2 A. When I was subpoenaed for his criminal  
3 trial.

4 Q. And before then no lawyers, like for  
5 instance Mr. Bemis -- he never called you?

6 A. No.

7 Q. And nobody from risk management had called  
8 you?

9 A. No.

10 Q. Now, your discussion with Amy Bochenek --  
11 that was after the Denise Hanna incident, correct?

12 A. Yes.

13 Q. And you said that occurred that day of the  
14 Denise Hanna incident, correct?

15 A. Correct.

16 Q. After that day, speaking with Amy Bochenek,  
17 did you speak with anybody else regarding Mr. Farmer,  
18 in terms of administrators or administration at  
19 Centennial Hills Hospital?

20 A. Not that I can recall.

21 Q. Okay. When you spoke with Amy Bochenek,  
22 did you tell her that the nursing staff had all been  
23 talking about Steven Farmer?

24 A. I don't recall.

25 Q. Is that something that you believe that



800.211.DEPO (3376)  
EsquireSolutions.com



1 it's more likely than not that you did?

2 A. I can't recall. I can't answer that.

3 Q. When Mr. Farmer was arrested, that didn't  
4 come as a complete shock or surprise to you, did it?

5 A. No.

6 MS. HALL: Objection. Lack of  
7 foundation.

8 BY MR. MURDOCK:

9 Q. And it didn't come as a complete shock or  
10 surprise because you already basically had these  
11 suspicions, correct?

12 MR. BEMIS: I object to form.

13 BY MR. MURDOCK:

14 Q. You can go ahead.

15 A. Correct.

16 Q. And these are the suspicions that you had  
17 voiced to Ray and others, correct?

18 MR. BEMIS: Same objection.

19 THE WITNESS: Correct.

20 BY MR. MURDOCK:

21 Q. Now, do you remember Kim's last name?

22 MR. SILVESTRI: Who?

23 MS. HALL: Kim.

24 THE WITNESS: No, I don't. I'm sorry.

25





TAB 81

DISTRICT COURT  
CLARK COUNTY, NEVADA

CASE NO. 09-A-595780-C  
DEPT. NO. II

ESTATE OF JANE DOE, by and through its  
Special Administrator, Misty Petersen,

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.

DEPOSITION OF AMY BLASING, MSN, RN

1:00 p.m.

July 28, 2015

Williams & Associates  
1608 Fifth Street, NW  
Albuquerque, New Mexico

PURSUANT TO THE RULES OF CIVIL PROCEDURE, this  
deposition was:

TAKEN BY: MR. ROBERT E. MURDOCK  
Attorney for the Plaintiffs

REPORTED BY: Dawn Redwine, RPR, CRI, NM CCR #165  
WILLIAMS & ASSOCIATES, LLC  
1608 Fifth Street, NW  
Albuquerque, NM 87102  
(505) 843-7789  
www.WilliamsNM.com



ESTATE OF JANE DOE vs. VALLEY HEALTH, et al.  
09-A-595780-C

Amy Blasing, MSN, RN  
July 28, 2015

1 A. Not that I recall.

2 Q. Okay. In other words, did you give a recorded  
3 statement to anybody?

4 A. Not that I recall.

5 Q. Did you ever give a written statement?

6 A. Not -- As part of an investigation, I'm not sure if  
7 -- I don't know that I ever wrote anything down.

8 Q. Okay.

9 A. I know that we had discussions, internal  
10 discussions about the incident, following.

11 Q. Okay. And who did you have internal discussions  
12 with?

13 A. Carol Butler, Quality and Risk.

14 Q. Who was at Quality and Risk?

15 A. I believe that was Janet Callahan and Yvette Wilson  
16 at the time.

17 Q. Okay. Any other people that you had discussions  
18 with?

19 A. Carol and I had discussions with employees after  
20 the incident.

21 Q. Where did those discussions take place?

22 A. In the hospital.

23 Q. I understand that. Where?

24 A. But I couldn't tell you specifically.

25 Q. Was it in a conference room?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 A. I'd be guessing if I answered. It could've been an  
2 office or a conference room.

3 Q. Was it on the floor?

4 A. I don't recall.

5 Q. Okay. Do you believe -- Is it more likely than not  
6 that it occurred in an office or a conference room type of  
7 setting?

8 A. That would be more likely.

9 Q. Okay. And it was you and Carol. Is that correct?

10 A. To my knowledge, yes.

11 Q. Was there anybody else there?

12 A. Not that I recall.

13 Q. Was there a lawyer there?

14 A. Not that I recall.

15 Q. Okay. Who did you speak with?

16 A. I remember speaking with Ray Sumera, Karen  
17 Goodhart, Darby Curlee.

18 Q. Anybody else?

19 A. Margaret Wolfe later. There may have been more  
20 people, but those are the names I recall.

21 Q. When you say "later," how much later?

22 A. I don't know the timing, but the conversation with  
23 Margaret was more specific to additional concerns that she  
24 shared, so I know it was later for that reason.

25 Q. Would you agree with me that it would've been

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 within two months of the initial conference you had with  
2 Sumera, Goodhart, and Curlee?

3 A. That sounds right.

4 Q. Okay. So if the initial conference occurred  
5 in late May, could we put an outside date on it of about  
6 August 1st? Would you agree with that?

7 A. That sounds fair. I don't recall the exact date.

8 Q. Okay. And were there notes taken at that meeting?

9 A. Not that I recall.

10 Q. Did you take any notes?

11 A. Not that I recall.

12 Q. Did Carol take any notes?

13 A. Not that I recall.

14 Q. Were the meetings tape-recorded?

15 A. No.

16 Q. Were they video-taped?

17 A. No.

18 Q. I'm sorry?

19 A. No.

20 Q. I'm curious. Why didn't you take any notes?

21 A. I just don't remember taking notes. It doesn't  
22 mean that I didn't.

23 Q. Oh, okay. So it's possible you took notes?

24 A. It was several years ago, so...

25 Q. I understand. So it's possible you took notes?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 A. It's possible, but I don't recall taking them.

2 Q. Okay. When you're in a meeting-type setting like  
3 that, would you agree with me it's more likely than not that  
4 you actually took notes?

5 A. Depends on the situation. If I'm having a  
6 conversation with someone, I don't always write anything down.

7 Q. Okay. This was more -- more than a conversation,  
8 though. You were actually investigating what occurred. Right?

9 A. Investigations were more Risk and Quality.

10 Q. Okay. So why were you talking to these people?

11 A. Our conversations, Carol and I, were more about did  
12 we miss anything, did the staff know that they could come  
13 forward if they felt uncomfortable about anything. Just more  
14 kind of follow-up to the concerns that we had become aware of,  
15 and making sure that we weren't missing any opportunities.

16 Q. Okay. So you don't know if you took notes or not.

17 A. Correct.

18 Q. If you took notes -- let's assume, just for the  
19 sake of argument, you did -- where would those notes be today?

20 A. I don't have any way of knowing that.

21 Q. Okay. What would you have done with them after the  
22 meeting? In other words, did you have a secretary who you  
23 would say, you know, "Type these up" --

24 A. No.

25 Q. -- or did you have a file, things like that?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 A. I did not.

2 Q. Okay. Did you have anything at all where you would  
3 have put notes?

4 A. Not formally, no.

5 Q. What about informally?

6 A. If I were to take notes on a notepad, it might be  
7 something that I used, like, to work with that day.

8 Q. Okay.

9 A. But if it wasn't part of any formal investigation  
10 or anything that I was typing up, I don't know where it would  
11 end up. I honestly don't recall taking any notes specific to  
12 this case.

13 Q. Okay. So, in other words, it's possible you did.  
14 You're just not sure. Is that right?

15 A. I don't remember taking any.

16 Q. Okay. So it's more likely than not that you didn't  
17 take any.

18 A. That's correct.

19 Q. Okay. Do you recall Carol Butler taking any notes  
20 at these meetings?

21 A. I don't.

22 Q. After the meetings, did you have discussions with  
23 Carol about your -- about your meetings with these nurses?

24 A. It's fair to say that that would have happened, but  
25 I couldn't tell you specifics.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 Q. How long afterwards would you have had that  
2 meeting?

3 A. Most likely, immediately.

4 Q. Okay. Now, the Margaret Wolfe meeting took place a  
5 couple of months later. Right?

6 A. I don't know the exact date. I just --

7 Q. No.

8 A. -- know it was after.

9 Q. I know.

10 A. But within a couple of months is fair.

11 Q. Within a couple of months.

12 A. Uh-huh.

13 Q. When did -- Did you have a discussion with Carol  
14 Butler about the Margaret Wolfe meeting?

15 A. I'm sure that we did. I can't tell you specifics.

16 Q. Why did you meet with Carol -- with Margaret Wolfe?

17 A. What I remember is that we were made aware that  
18 Margaret had expressed concerns, and we were following up to  
19 find -- it was new information to us, so we were both following  
20 up to get more information and making sure that people knew  
21 what the proper channel would be if they had concerns in the  
22 future.

23 Q. In fact, my understanding is that you became aware  
24 that a -- that Margaret had spoken with the police about the  
25 situation. Is that right?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 A. That sounds familiar, but I couldn't tell you  
2 specifics.

3 Q. Right. And as a -- as a matter of fact, you became  
4 aware, and this was back in -- In between May of 2008 and  
5 August of 2008, you became aware that there actually was a  
6 police report, where Margaret spoke to the police. Right?

7 A. I don't remember the specifics.

8 Q. Well --

9 A. I became aware that she had shared information. I  
10 don't know that I had knowledge of the police report or not.

11 Q. Okay. Did you ever ask for a police report?

12 A. No.

13 Q. Have you ever read a police report?

14 A. Not that I recall.

15 Q. It's possible you did? You just don't know?

16 A. I don't recall ever seeing a police report related  
17 to this case.

18 Q. Okay. Well, that's funny, because I understand  
19 that you had a meeting with several of the nurses where you  
20 actually went over some of the police reports. Do you remember  
21 that?

22 A. I remember meeting with the nurses about how to  
23 escalate concerns, but I don't remember ever having copies of  
24 police reports or sharing them.

25 Q. Okay. Do you remember meeting with a nurse by the

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 name of Christine Murray?

2 A. I don't.

3 Q. Okay.

4 A. I don't remember who that is.

5 Q. Margaret Wolfe told the police on May 30th, 2008,  
6 that -- about conversations she had with Mr. Ray Sumera. Do  
7 you remember that?

8 A. I remember that, yes.

9 Q. Okay. Did you ever confirm that with Mr. Sumera?

10 A. Carol and I, I believe, spoke to Ray.

11 Q. And Ray confirmed it, I assume.

12 A. Ray remembered having a conversation with Margaret,  
13 but the content was different.

14 Q. Okay. Did you ever speak to Margaret about that?  
15 In other words, did you confront her with that and say, "Well,  
16 wait a minute. Ray says you had a different conversation"?

17 A. I believe that we did, but I don't know the  
18 specifics.

19 Q. Okay. And, of course, did you make a report of it?

20 A. Report?

21 Q. Well, she lied to you.

22 A. I think we --

23 MR. PRANGLE: Well, that's argumentative.

24 Q. I don't know. If she lied to you or -- I mean, she  
25 told you something that Ray didn't remember.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 A. I didn't say she said something that Ray didn't  
2 remember. I said that the content was different in each of  
3 their stories.

4 Q. Okay. So which one was telling the truth?

5 A. I wouldn't know --

6 Q. Did you ever determine that?

7 A. -- that. I wasn't there. I wouldn't know that. I  
8 wasn't there.

9 Q. Did you ever investigate it?

10 A. We talked to them both, yes.

11 Q. And tell me about who you talked to and how you  
12 talked to them. Tell me about that.

13 A. What I remember is that we talked to Ray, and Ray  
14 remembered having a conversation with Margaret, but it was more  
15 about her not being happy that Steven Farmer was doing tasks  
16 without being directed to do so, and she wanted to know when  
17 someone was doing something for any patient that was in her  
18 care, and that she was also concerned about making sure that  
19 doors or curtains -- I'm not sure which -- were closed for  
20 privacy. And I believe that Ray had a conversation with Steve  
21 about the privacy piece. Margaret's version was different than  
22 that.

23 Q. What was Margaret's version?

24 A. Margaret said that she expressed concerns that  
25 Steven Farmer seemed to seek out duties with females and was

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 overeager and that she felt uncomfortable. I'm using my own  
2 words, but that's paraphrasing.

3 Q. No, I understand.

4 Margaret also told you that Ray Sumera had come to  
5 her with concerns?

6 A. I don't know if she told us that or that was the  
7 report, I can't remember which, but that was a difference in  
8 their stories, as well.

9 Q. Well, what do you mean, "that was the report"?  
10 What report?

11 A. I don't know if that was what she told law  
12 enforcement or if that was what she told Carol. We got the  
13 story kind of secondhand.

14 Q. Well, how do you know she told law enforcement if  
15 you never saw the report?

16 A. It got back to --

17 Q. How did it get --

18 A. -- us somehow and --

19 Q. -- back to you?

20 MR. PRANGLE: Hold on. Hold on.

21 A. I can't remember the specifics.

22 MR. PRANGLE: Hold on. Let her --

23 Q. How did you find out before the report?

24 MR. PRANGLE: -- finish the answer. When that's  
25 done --

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 A. I don't remember.

2 Q. Okay. So, in other words, you testified earlier  
3 today you've never seen a report, but now you know about the  
4 report.

5 A. I still haven't seen it.

6 Q. So tell me when the first time you found out about  
7 the report.

8 A. I couldn't tell you the details. I don't know if  
9 Margaret came and told us or if someone else did, but somehow  
10 it got back to us that Margaret had shared concerns with law  
11 enforcement. I don't -- I don't know that details were shared  
12 initially. And then we started talking about it with the team.

13 Q. Was that before you met with her in between May and  
14 August?

15 A. We became aware of it and then met with her, yes.

16 Q. Okay. But you -- as you sit here today, you have  
17 no idea how you became aware of it?

18 A. I can't remember. I don't want to guess.

19 Q. I don't want you to guess. Okay. So you have no  
20 idea how you became aware of it, but you actually became aware  
21 of the contents of it, as well. Right?

22 A. I became aware that she shared information.  
23 Contents of the police report, those are two different things  
24 to me.

25 Q. Well, you were aware, as you just told me before,

WILLIAMS & ASSOCIATES --- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 that Margaret was saying that Ray came to her.

2 A. When she told the story of how she expressed the  
3 concerns, yes.

4 Q. When did she tell you that?

5 A. When we met with her and talked to her.

6 Q. Okay. So let's put it this way. As of August of  
7 2008, you, as the Department of Emergency -- as the head of  
8 Department of Emergency Services at Centennial Hills Hospital,  
9 you were aware that Margaret Wolfe was alleging that Ray Sumera  
10 had come to her and expressed concerns about Ray Sumera. Is  
11 that correct?

12 A. She didn't express concerns about Ray Sumera.

13 Q. I'm sorry. I'm sorry. Let me restate the  
14 question. That was my bad.

15 In between May and August 1 of 2008, you, as the  
16 department -- as the head of the Department of Emergency  
17 Services at Centennial Hills, became aware that -- through  
18 Margaret Wolfe that Ray Sumera had come to Margaret Wolfe with  
19 concerns about Steven Farmer. Is that correct?

20 A. I don't remember the details enough to say if I  
21 heard that directly from her or from someone else. What I  
22 remember is that Margaret had expressed concerns to Ray. Who  
23 initiated the conversation, I don't know what I was told  
24 initially.

25 Q. Well, you already -- you just testified somehow you

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 were aware that Margaret stated that Ray told her about  
2 concerns. Right? About Farmer.

3 A. I remember there being several different versions  
4 of the story. One was that --

5 Q. Okay.

6 A. -- Ray went to Margaret and initiated a  
7 conversation. The other was that Margaret went to Ray and  
8 initiated the conversation.

9 Q. Let's just keep those two for right now. Whatever  
10 it is, okay, those two versions, at least.

11 A. Yes.

12 Q. You knew those two versions as of August 1, 2008.  
13 Would you agree with that?

14 A. At some point within a few --

15 Q. Is that fair?

16 A. -- months if we say August. I -- I can't validate  
17 the date, but that sounds fair, yes.

18 Q. Okay. When was the first time you spoke with  
19 counsel about this matter?

20 A. Cagnina case?

21 Q. Any. I don't care.

22 A. I don't -- I don't know that I could tell you.

23 Q. Okay. Did you ever investigate -- You said you  
24 had two different versions here. Did you have each of them,  
25 Mr. Sumera and Ms. Wolfe, write down their respective versions?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 A. We did not have them write them down, to my  
2 recollection. We spoke to them each.

3 Q. Did you take notes from that?

4 A. Not that I recall.

5 Q. Okay. Did you ever have them both in a room  
6 together --

7 A. Not that I recall.

8 Q. -- where they could say, "Well, wait a minute.  
9 Margaret, I didn't say that" or "Wait a minute, Ray. I didn't  
10 say that"? Did you ever do that?

11 A. Not that I recall.

12 Q. Did you ever get to the bottom of the truth?

13 A. The stories were different.

14 Q. I know.

15 A. And they stuck to their stories.

16 Q. Did you ever get to the bottom of it, though?

17 A. There wasn't a way to really prove or disprove.  
18 They both had different versions --

19 Q. Okay.

20 A. -- of what they remembered.

21 Q. Okay.

22 A. So we addressed it by making sure that people knew  
23 how to escalate and when to come forward with concerns in the  
24 future.

25 Q. Did you ever put a note into her employee file

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 about this incident?

2 A. Not that I recall.

3 Q. So you didn't know what happened, you didn't know  
4 what version was the correct version, Ray's version or  
5 Margaret's version; but, nevertheless, is it safe to say that  
6 you believed it was more like the game of telephone, as opposed  
7 to someone was lying?

8 A. I don't --

9 Q. Or the other way around. Maybe you thought someone  
10 was lying.

11 A. I personally at the time -- I think that it's easy,  
12 when you hear something surprising and horrible, to start  
13 looking back and seeing things.

14 Q. Okay. That doesn't answer my question.

15 A. I -- I don't know that I would classify it the way  
16 that you just said it, no.

17 Q. So you wouldn't classify it as a lie?

18 A. I don't know. I can't call something a lie without  
19 seeing the truth myself.

20 Q. Okay. Wouldn't it have been -- Wouldn't it --  
21 Strike that.

22 Wouldn't it have been important to come to a  
23 conclusion?

24 A. If we had proof, that would be easy.

25 Q. Well, but if Margaret is making up stories, that's

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

**WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE**  
505-843-7789

1 a terminable offense.

2 A. I couldn't prove that either of them was telling  
3 the truth or not telling the truth.

4 Q. Right. And I was just going to say, and if Ray  
5 is telling stories that aren't true, that's a terminal --  
6 turna- -- turnable -- termable -- terminable --

7 MR. PRANGLE: He can be fired for that.

8 MR. MURDOCK: Thank you.

9 MR. PRANGLE: Sure.

10 MR. MURDOCK: Thanks.

11 Q. -- offense. Is that correct?

12 A. It could be, yes.

13 Q. Okay. But a decision was made just to kind of let  
14 it be and decide, you know what, we're not going to get to the  
15 bottom of it. What we're going to do is we're going to say,  
16 "Look, if you see concerns, report it." And you gave them, you  
17 gave all your staff, ways to make sure -- policies and  
18 procedures to make sure they knew what to do in certain  
19 situations. Is that right? Is that fair?

20 A. That's fair.

21 Q. Okay. Now, do you know Crystal Johnson?

22 A. Yes.

23 Q. Were you involved at all with bringing on agency  
24 staff?

25 A. Not directly, no.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 little background on that.

2 A. I think that depending on who you ask and what  
3 point in time, you'll get a different answer. But at that  
4 time, we were still on paper documentation in the Emergency  
5 Department, so it was common to chart -- everyone could chart  
6 there. But on the inpatient units, they had an electronic  
7 system, and the agency staff may or may not, depending on if it  
8 was their first day and if they had been trained how. So  
9 that's why you might get variations.

10 Q. Okay. Okay. Oh, that makes sense.

11 A. They're sitting --

12 Q. That makes sense.

13 A. They're now all on an electronic system. But at  
14 the time, we were different in the ED than in the inpatient  
15 units.

16 Q. So it's not just -- So actually both could be  
17 correct --

18 A. Correct.

19 Q. -- in that situation.

20 A. Correct.

21 Q. When did you have this meeting with Mr. Sumera,  
22 Ms. Goodhart, and Ms. -- one of the other nurses?

23 A. Darby Curlee.

24 Q. Darby Curlee.

25 A. In the days following. It would've depended when

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 that goes along with the sentinel event, that I'm not allowed  
2 to get.

3 MR. PRANGLE: The MIDAS?

4 MS. HALL: The incident report?

5 MR. MURDOCK: No. Forget it. You guys aren't  
6 helpful.

7 MR. PRANGLE: I'm not trying to be helpful.

8 A. I only remember being involved in the State Board  
9 notification and the agency notification, myself.

10 Q. Okay. And that is it. Right?

11 A. That's all I remember.

12 Q. And aside from the meeting with Carol Butler and --

13 A. The discussions we had with staff.

14 Q. -- the discussions you had with staff, that was it?

15 That was all that was --

16 A. That's -- That's what I remember. It doesn't mean  
17 that more didn't happen. It just was a long time ago, so I'm  
18 doing my best.

19 Q. Well, I understand that, but here's the thing.  
20 Today is my opportunity to find out what you know.

21 A. Right.

22 Q. So I don't want to be surprised in November when  
23 you come testify and you say to me, "Well, oh, no. Now I  
24 remember."

25 A. I don't think my memory will improve between now

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 Q. What is the MIDAS system?

2 A. It's an incident-reporting system.

3 Q. And if a nurse or staff witnesses an incident, I  
4 guess of any kind, they use the MIDAS system. Right?

5 A. That's what it's for, yes.

6 Q. Okay. So what kind of incidents go into the MIDAS  
7 system?

8 A. In a general sense, any incident that could pose  
9 risk or has an unanticipated outcome.

10 Q. And at orientation before the hospital opened, I  
11 assume you instructed staff about the MIDAS system.

12 A. All of our staff went through a system orientation.  
13 I did not conduct that myself.

14 Q. Oh, okay. So as you sit here today, you can't tell  
15 me whether or not staff was aware of the MIDAS system and what  
16 needed to be put in there or not. Is that right?

17 A. That should have been part of their orientation,  
18 but I'm not the best person to speak to that, because that was  
19 not my area. We had a Clinical Education Department that did  
20 onboarding for all employees.

21 Q. Sure. Okay. Why weren't statements taken, actual  
22 written statements taken, of Ray Sumera, Karen Goodhart, and  
23 Margaret Wolfe?

24 A. I don't know. I don't know if statements were  
25 taken. I just know that I don't have any.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 Q. Well, you didn't take any.

2 A. Correct.

3 Q. You and Carol Butler didn't take any, as far as you  
4 know.

5 A. Not that I know of, no. I can't speak for Carol.

6 Q. But you can speak for yourself.

7 A. Correct.

8 Q. And you didn't take any.

9 A. Correct.

10 Q. Did Ray Sumera -- With Cagnina, did Ray Sumera put  
11 that incident in the MIDAS system?

12 MR. PRANGLE: I want to just object to foundation  
13 as to whether Sumera witnessed anything with Cagnina that would  
14 prompt such a report. He was not on the floor.

15 MR. MURDOCK: I understand.

16 A. I can't answer that question. I don't know.

17 Q. Did Margaret Wolfe put anything into the MIDAS  
18 system?

19 A. I don't -- I don't know.

20 Q. Did Karen Goodhart?

21 A. I don't know if anyone did. I don't have that  
22 knowledge.

23 Q. How did you know who to meet with?

24 A. There were two different topics. The first  
25 incident with Cagnina, we knew who the nurse was, which was

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789



1 Karen Goodhart. Darby Curlee. Darby Curlee was, I believe,  
2 the charge nurse. So we knew who was working.

3 With the second incident, when we became aware of  
4 the other concerns that Margaret expressed, Ray was named in  
5 that information, so we talked to the two of them.

6 Q. You said Ray was named in that information.

7 A. That Margaret had shared with him.

8 Q. Okay.

9 A. That was the story that we became aware of.

10 Q. Well, were there any documents, though, that had  
11 that?

12 A. Not that I know of.

13 Q. I'm trying to figure out how you became aware of  
14 the whole Ray Sumera and Margaret Wolfe drama.

15 A. And I can't recall. It was so long ago, I don't  
16 know if it was a phone call or an in-person. I have no idea  
17 how that came back to us. It could have been Margaret herself.  
18 I don't know.

19 Q. And just so I'm clear, after the whole situation,  
20 after your discussions with Mr. Sumera and Ms. Wolfe, neither  
21 of them was written up. Correct?

22 A. Not to my knowledge.

23 Q. You didn't write them up?

24 A. Not that -- No, not that I know of.

25 Q. You're the director of the Emergency Services.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

**WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE**  
505-843-7789



1 A. Right.

2 Q. So you would've been the one to write them up.

3 A. Uh-huh.

4 Q. Right?

5 A. I could have been. Not --

6 Q. Okay. But you didn't.

7 A. -- the only one. Not that I know of, no.

8 Q. Okay. But you didn't specifically. Right?

9 A. No.

10 Q. You didn't specifically write up Ms. Wolfe.

11 A. Right.

12 Q. Outside of you and Ms. Butler, are you aware of  
13 anybody else knowing about the Ray Sumera and Margaret Wolfe  
14 discussions?

15 A. I would think Risk and Quality did, but --

16 MR. PRANGLE: Don't guess.

17 A. -- but I'm guessing, so never mind. No --

18 Q. How would you guess that?

19 A. -- I'm not, because typically that's something that  
20 they would be aware of.

21 Q. How would they be aware of it?

22 A. Somebody would notify them.

23 Q. Who?

24 A. It could be many people.

25 Q. Did you?

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE  
505-843-7789

1 A. I don't remember.

2 Q. Did Carol?

3 A. I couldn't answer that.

4 Q. Did you do a MIDAS report?

5 A. I don't recall.

6 Q. Should you have done a MIDAS report?

7 A. Somebody should have --

8 Q. Did you?

9 A. -- if they thought there was risk.

10 The Margaret-and-Ray incident was tough because it  
11 really boiled down to different perceptions of a conversation.

12 Q. Okay. But, nevertheless, it affected patient care.  
13 Right?

14 A. Not that we identified, no. It was, I have a bad  
15 feeling about someone, versus, that's not what she communicated  
16 to me. But there was no action that was identified from that  
17 incident. To my -- To my memory, that was what the  
18 conversations were about. There was no allegation of any  
19 wrongdoing. It was, I have a bad feeling. He's putting leads  
20 on my patients, which was part of the job. And Ray having a  
21 totally different understanding of that exchange.

22 Q. Actually, let me do this. I'm trying to pull this  
23 up. I'm going to have you read the Margaret Wolfe statement.  
24 It's PDDISC0162. It's where it starts. Why don't you just  
25 take a breeze through that. Take some time. It's 15 pages. I

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

**WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE**  
505-843-7789

1 before?

2 A. Today is the first time that I've read it, to my  
3 knowledge.

4 Q. I understand that. Have you ever been shown --

5 A. Not that I remember.

6 Q. -- this document before?

7 A. Not that I remember before now.

8 Q. Has anybody discussed this document with you?

9 A. I knew of its existence.

10 Q. And you knew of its existence prior to -- and I  
11 think we agreed on this before -- August 1, 2008. Is that  
12 correct?

13 A. I knew in that first few months after that Margaret  
14 had expressed concerns with the Police Department, yes.

15 Q. Okay. And you knew of the existence of the  
16 voluntary statements. Correct?

17 A. I think that's fair.

18 Q. Okay. During that same time frame? Is that  
19 correct? Is that fair?

20 A. Sure.

21 Q. Okay. Now, the statement goes a little bit further  
22 than what you just said before. Do you agree with that?

23 MR. PRANGLE: Objection to the form. Vague.

24 A. What I was telling you before was what I remember  
25 from the conversations with Margaret and Ray, yes.

WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICES

**WILLIAMS & ASSOCIATES -- COURT REPORTING SERVICE**  
505-843-7789

TAB 82

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DISTRICT COURT  
CLARK COUNTY, NEVADA  
JANE DOE,  
Plaintiff,  
vs.  
CASE NO. 09-A-595780  
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.

~~~~~

DEPOSITION OF  
CHRISTINE MURRAY, RN  
Thursday, January 8, 2015  
1:30 p.m.  
521 S. Third Street  
Las Vegas, Nevada  
Carol O'Malley, CCR 178, RMR



1 can think of, like I said, is the older lady that he  
2 did the one-to-one sittings with" --

3 A. Oh, okay.

4 Q. You said there was a conversation between  
5 you and the rest of the nurses about this incident.

6 A. That would have been as we were standing at  
7 the nurses' desk when the yelling was going on, after  
8 the nurse walked into the room.

9 Q. Do you recall how many nurses --

10 A. Well, there wouldn't have been more than  
11 three, because there was never more than four of us.  
12 And if she went in the room, that left three.

13 Q. And did any of you have a conversation with  
14 that nurse after the fact?

15 MR. BEMIS: Calls for speculation.

16 BY MR. MURDOCK:

17 Q. As far as you know?

18 A. I have no idea.

19 Q. You certainly didn't, is that right?

20 A. I did not, no.

21 Q. Okay. Outside of hearing the patient yell,  
22 "I don't want you by me, get out of here," did you  
23 hear her yell anything else?

24 A. No, I did not.

25 Q. Do you recall her yelling anything else?

1 A. No.

2 Q. So just so I'm clear, when you stated, "So  
3 we didn't put any credence into what she was saying,"  
4 you were talking about when she was yelling, "I don't  
5 want you by me, get out of here." Is that right?

6 A. Yes.

7 Q. Okay. Now, this occurred on the 6th floor,  
8 didn't it?

9 A. On the 6th floor?

10 Q. Yeah.

11 A. I thought it was on the 7th floor.

12 Q. Well, why don't you keep reading down on  
13 181. Maybe that will refresh your recollection.

14 A. Okay. Then yes, it was. We got pulled  
15 back and forth, so it's easy to not remember exactly  
16 what floor you were on every night.

17 Q. Now, would the drawing that you made as  
18 Plaintiff's Exhibit 1 -- would that be different  
19 because it was on the 6th floor, as opposed to the  
20 7th?

21 A. No. They're all exactly the same.

22 Q. Okay. Now, then the policeman says to you,  
23 "Okay. Do you remember what she was in for? What  
24 that victim?" Then you state, "I don't know."

25 A. Right.

1 Q. You're talking about the --

2 A. Patient.

3 Q. -- what you termed the little crazy old  
4 lady patient, is that correct?

5 A. The patient, yes.

6 Q. But that's the patient we're talking about  
7 here, right?

8 A. Yes.

9 Q. Now, outside of telling the police about  
10 this -- what you termed "the little crazy old lady,"  
11 and the incident with Mr. Farmer -- did you ever tell  
12 anybody else about that?

13 A. No.

14 Q. After the incident took place, after the  
15 arrest, and Ms. Cagnina, things like that, did you  
16 ever tell anybody at the hospital about this  
17 incident?

18 A. No.

19 Q. So the first and only time you ever  
20 discussed this patient, the little crazy old lady  
21 patient with anyone, would have been with this  
22 detective. Is that correct?

23 A. No. Wait a minute. The director of  
24 nursing called me down and we talked about this, too,  
25 after I talked to the police. When she got a copy of



1 this, I talked to her. And that was it.

2 Q. Who was the director of nursing at the  
3 time?

4 A. I really don't know.

5 Q. But the director of nursing called you down  
6 after she read the statement, is that correct?

7 A. Yes. She talked to all of us.

8 Q. What do you mean, she talked to all of you?

9 A. She talked to all the nurses that were  
10 involved in this.

11 Q. Did you go through the statement with her?

12 A. She asked me what happened. I told her  
13 what I knew. We didn't pick this up and go through  
14 it line by line like we are now, but she knew what  
15 was -- I mean she had read it.

16 Q. Did she ask you about the little crazy old  
17 lady patient? Was that something you discussed?

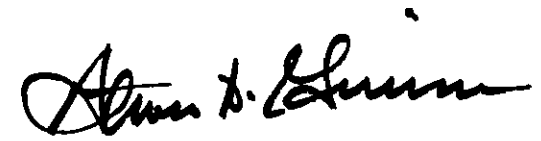
18 A. You know, I'm not sure. She just asked  
19 about what I knew. No, I don't believe we did go  
20 through that. We went through the other part,  
21 because that was what was coming up.

22 Q. And outside of me asking you about this  
23 little crazy old lady patient, and the detective, has  
24 anybody else ever asked you about it?

25 A. No.

TAB 83





CLERK OF THE COURT

TRAN

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

|                           |   |                      |
|---------------------------|---|----------------------|
| ESTATE OF JANE DOE,       | ) |                      |
|                           | ) | CASE NO. A-09-595780 |
| Plaintiff,                | ) | DEPT NO. II          |
| vs.                       | ) |                      |
|                           | ) |                      |
| VALLEY HEALTH SYSTEM LLC, | ) |                      |
|                           | ) |                      |
| Defendant.                | ) | <b>TRANSCRIPT OF</b> |
|                           | ) | <b>PROCEEDINGS</b>   |

BEFORE THE HONORABLE RICHARD F. SCOTTI, DISTRICT COURT JUDGE

**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**

MONDAY, DECEMBER 7, 2015

APPEARANCES:

|                            |                                                                                                    |
|----------------------------|----------------------------------------------------------------------------------------------------|
| For the Plaintiff:         | ROBERT E. MURDOCK, ESQ.<br>ECKLEY M. KEACH, ESQ.                                                   |
| For Steven Farmer:         | HEATHER S. HALL, ESQ.                                                                              |
| For American Nursing:      | AMANDA J. BROOKHYSER, ESQ.<br>RYAN W. BIGGAR, ESQ.                                                 |
| For Centennial Defendants: | MICHAEL E. PRANGLE, ESQ.<br>JOHN F. BEMIS, ESQ.<br>DENNIS L. KENNEDY, ESQ.<br>MARK D. HESIAK, ESQ. |

RECORDED BY ELSA AMOROSO, COURT RECORDER  
TRANSCRIBED BY: KARR Reporting, Inc.

KARR REPORTING, INC.

1           **LAS VEGAS, NEVADA, MONDAY, DECEMBER 7, 2015, 9:06 A.M.**

2                           **\* \* \* \* \***

3           THE COURT: So this is the time set for the  
4 defendant's motion for reconsideration of this Court's  
5 November 4, 2015 order in Jane Doe vs. Valley Health, Case  
6 No. A595780. So I have read the motion, the opposition, the  
7 reply that I received. I got that.

8           I re-read the Court's order, and I also took a  
9 further look at some of the more relevant cases. And in  
10 particular I also looked at the Clark County School District  
11 Richardson case and the GNLV Service Control case, and  
12 generally the other cases cited by the parties. So I'm up to  
13 speed, ready to go.

14           I think one of the primary issues that I see here is  
15 did the Court have before it evidence from which it could  
16 conclude that Centennial's employees acted intentionally and  
17 willfully in withholding material evidence in the case. So  
18 that's one of the primary issues in this case.

19           That being said, please make your appearances, and  
20 then we can proceed with argument.

21           MR. KEACH: Marty Keach and Rob Murdock for the  
22 plaintiff, Your Honor.

23           MR. KENNEDY: Dennis Kennedy and Mark Hesiak for the  
24 Centennial defendants. Also present, Mike Prangle and John  
25 Bemis.

1 THE COURT: All right. Very well. All right. So I  
2 do have a 10:00 o'clock -- oh, someone else is standing?

3 MR. BIGGAR: Yes. We're all here.

4 THE COURT: Sorry.

5 MR. BIGGAR: Ryan Biggar and Amanda Brookhyser for  
6 Defendant American Nursing Services.

7 MS. HALL: And Heather Hall on behalf of Steven  
8 Farmer.

9 THE COURT: Very well. I do have a 10:00 o'clock  
10 hearing on a motion to suppress, so my criminal calendar. And  
11 then I have to start right after that with a criminal murder  
12 trial. So if you gentlemen could keep your arguments to  
13 roughly 20 minutes each side, or take less, that would be the  
14 pleasure of this Court. All right. Please proceed.

15 MR. KENNEDY: I will do that, Your Honor, because I  
16 know you're thoroughly prepared and the matter was pretty well  
17 briefed on both sides.

18 THE COURT: Thank you. A lot of material that you  
19 both wrote, so thank you for that. It was all helpful.

20 MR. KENNEDY: As a starting point, as the Court  
21 knows, the Court in its order ordered that the monetary  
22 sanctions, \$18,000, that had been imposed by the discovery  
23 commissioner be imposed again against Centennial, we haven't  
24 contested those. I have the two checks here.

25 THE COURT: Okay.

1 MR. KENNEDY: So I'll give those to counsel.

2 MR. KEACH: Okay.

3 THE COURT: All right. The record will reflect that  
4 you have provided that to counsel.

5 MR. KENNEDY: And they'll open it up and look to  
6 make sure they're there.

7 MR. KEACH: Just to see what they look like.

8 MR. KENNEDY: And that's of course without prejudice  
9 to the arguments we make here, because we didn't contest --

10 THE COURT: Understood.

11 MR. KENNEDY: We didn't contest that.

12 THE COURT: It's without prejudice, of course.

13 MR. KENNEDY: And the Court's right. I mean,  
14 there -- the primary issue is, if you go back and look at the  
15 record and the evidence, was there sufficient evidence there  
16 if you apply what we believe to be the correct standard,  
17 the -- call it the corporate knowledge standard. Is there  
18 sufficient evidence in the record to find that at least one  
19 employee of Centennial had the proper state of mind; that is  
20 willful suppression for the purpose of harming the plaintiff.

21 And as we point out in some detail in the motion,  
22 there is no identification of a particular employee having  
23 that particular state of mind. And of course, that's required  
24 in order to impose the level of sanctions that were imposed  
25 here. Lower levels of sanctions, of course, can be imposed

1 without that finding.

2 But we think that the cases that we cited Judge  
3 Hicks's opinion in, I want to make sure I pronounce the name  
4 of the case correctly, Jeanina [phonetic] and the three others  
5 say that really is the standard of proof that's required to  
6 prove the requisite state of mind. And if we go back through  
7 the record itself, that evidence isn't there.

8 The Court, it appears, aggregated the knowledge of  
9 the three nurses and the two other personnel, the director of  
10 nursing and the director of the emergency room, to say taking  
11 all of that together, I will then take the next step up and  
12 make that finding. And as we point out, to impose this level  
13 of sanction, that's not sufficient.

14 There has to be somebody there who actually  
15 suppressed evidence and had the proper state of mind to reach  
16 this level of sanction, and that evidence just isn't there in  
17 the record.

18 THE COURT: Doesn't the passage of time make it  
19 difficult for the plaintiff to present any more evidence than  
20 that which they've already presented on the extent of  
21 willfulness and culpability of the defendants?

22 And I'm not saying that there wasn't sufficient  
23 evidence. I'm just asking the question wouldn't it have been  
24 difficult through the passage of time for them to come up with  
25 more, and that would be attributed in part to what the



1 defendants have admitted, that there was at least negligent  
2 culpability by the defendant's attorneys in failing to turn  
3 over the relevant material?

4 MR. KENNEDY: Yeah. And you can't dispute that,  
5 that it's more difficult with the passage of time, but  
6 nevertheless the burden of proof doesn't change. And that  
7 goes more, I think, to the finding of negligence than it does  
8 to the finding of willful and intentional conduct. Because  
9 there has to be something there to find the willful and  
10 intentional conduct.

11 And the depositions, the depositions ultimately were  
12 taken, the time has passed, but there isn't any evidence at  
13 all that other than people hearing rumors or having suspicions  
14 actually did anything to willfully suppress the evidence. And  
15 if you look back at the statements that were given to the  
16 police, those tend to confirm that the evidence itself, the  
17 evidence that's contained in those statements was as people  
18 presented it to be.

19 In other words, there's no evidence that after the  
20 statement's given to the police, that somebody changed their  
21 story or did something else. And what you have is you have  
22 the lawyers saying, look, we should have disclosed this  
23 evidence, we should have said these things, but for reasons of  
24 our own shortcomings that didn't happen. And so on the  
25 record --

1           And it is, there's no question, the plaintiff's  
2 burden to come forward and make those proofs, and if they  
3 can't, the law doesn't allow the Court just to make a leap  
4 saying, well, you know, without the passage of time I'm sure  
5 somebody could have proved this culpable state of mind. There  
6 just isn't any evidence as to that culpable state of mind.

7           Now, that doesn't mean there's no sanctions. We  
8 agree with that, that absent the intentional wrongdoing just  
9 for negligence and failure to do what you're required to do  
10 under the rule, sanctions can be imposed. But the level of  
11 sanctions here can't be imposed without that finding.

12           THE COURT: Are you suggesting that the requisite  
13 culpable state of mind is not simply intent and a willful  
14 withholding of documents, but it needs to go beyond that to an  
15 actual purposeful state of mind to actually harm the  
16 plaintiff?

17           MR. KENNEDY: Yeah, it does. And here's the reason  
18 why. I mean, somebody can intentionally withhold documents,  
19 but for what they believe to be a legitimate purpose. And you  
20 can say, well, you intentionally withheld that, and the party  
21 can say, well, yes, I did and here is my reason, and then of  
22 course there's a dispute over the reason.

23           As opposed to the party in the Johnny Ribeiro case,  
24 who created false evidence. Then you can say, well, from the  
25 creation of false evidence, you know, it's easy for the Court

1 to conclude that you have the improper state of mind.

2 THE COURT: Right. And of course, the courts rarely  
3 find and juries rarely find direct evidence of a culpable  
4 state of mind of purposeful intent to harm another side, and  
5 that often has to be derived from circumstantial evidence,  
6 including the milieu of evidence that surrounds not only the  
7 withholding of the evidence, but all the other surrounding  
8 facts and circumstances.

9 MR. KENNEDY: Exactly right. And that leads me  
10 into, in a couple steps, our second point about the notice to  
11 the lawyers. In this case, and we point out in the motion, we  
12 say, you know, not in so many words, but let's look at these  
13 five people, what did they have and what did they know. And  
14 in order to find circumstantially that there was a culpable  
15 state of mind, you would need some evidence of that, call it  
16 motive or reasons for acting.

17 And each of these persons, I mean, you have three  
18 nurses who say, look, I said what I said and I told people  
19 what I told them. Okay. And I had heard this and we  
20 suspected this [inaudible] and this is exactly what we told  
21 the police, the two Murray and Wolf [phonetic] statements to  
22 the police. Okay. So and that was done essentially 30 to 60  
23 days after the event in question.

24 And so those people obviously had no motive to  
25 withhold or hide anything, because they were fully forthcoming

1 with law enforcement. And then we have the third nurse who  
2 didn't give a statement, but who simply said, look, here's  
3 what I remember and here's what I don't remember. And as we  
4 point out, these people, two of the three, Murray and Wolf,  
5 left the employ of the hospital in 2010. So it's not as  
6 though there's some long-running plan or plot to do something.

7 I mean, they're gone in 2010, and the discovery  
8 continues in the years after that. So to think that they hid  
9 something when they had left and had given statements to the  
10 police, circumstantially you just can't make that leap. And  
11 that then -- these are the people with the percipient  
12 knowledge of what happened, and they had told law enforcement  
13 what they knew.

14 And that leads me into my second point, and that is  
15 the distinction has to be drawn between the attorneys and the  
16 client here as to what was done. There isn't really any  
17 evidence in the record that the client employees did anything  
18 at all to hide or withhold. In fact, the evidence is quite to  
19 the contrary; as I said, the statements to law enforcement.  
20 And that brings us to my second point, and that is the conduct  
21 of the lawyers.

22 Now, I know what the lawyers said in the original  
23 sanctions hearing, and those were appropriate statements based  
24 on the record. But when you look at the client, the client  
25 didn't prepare the 16.1 disclosures. I mean, we cited some

1 stuff in the restatement and the -- and elsewhere saying,  
2 look, when stuff like that is prepared by the lawyers, their  
3 clients trust the lawyers to do the 16.1, because quite  
4 frankly, their clients have no idea what that is.

5 And so the clients either gave to the lawyers or the  
6 lawyers had, from the other case --

7 THE COURT: You actually argued and admitted that  
8 imputation can go from the lawyers to the client.

9 MR. KENNEDY: But it can't. I take it back. It can  
10 go from lawyers to client.

11 THE COURT: Lawyers to client, but you said it can't  
12 go from clients to lawyers.

13 MR. KENNEDY: That's right.

14 THE COURT: I think that's what you said.

15 MR. KENNEDY: Yeah. It can't go from client to  
16 lawyer. So when you have the lawyers preparing the  
17 disclosures that are made, there is a point where you cross  
18 that line and you say it's the lawyer's responsibility at some  
19 point to make sure those disclosures are accurate.

20 And the lawyers in this case said, look, we had the  
21 other case, the C case, where we had actually interviewed  
22 these witnesses in that case, so we knew. We knew. We had  
23 interviewed them, and it was our mistake that they didn't get  
24 disclosed.

25 So in order to find some sort of willful suppression



1 by the client, by Centennial, it's almost impossible, because  
2 those disclosures had been made to the lawyers already about  
3 this particular CNA. And at that point it becomes the  
4 lawyer's obligations to make the disclosures, the 16.1  
5 disclosures. If there is fault as to the deficiencies in  
6 those disclosures, as the lawyer said at the hearing, look,  
7 that is our fault, you know, we did that or failed to do that.  
8 You can't blame the client for that.

9 And that brings me to my second point, which is what  
10 we call the due process argument, which is in the notice of  
11 what was to be covered at the hearing that came out of  
12 Discovery Commissioner Bulla's report and recommendations.  
13 There's nothing in there that says these lawyers may have  
14 violated Rule 3.3, or that's something that the Court should  
15 take up. That's not in there.

16 And so the lawyers came and argued that motion to  
17 the Court and the findings then that came out said, well, the  
18 lawyers -- that came out from this Court said the lawyers have  
19 violated these rules of professional conduct.

20 THE COURT: Well, I didn't sanction the lawyers.

21 MR. KENNEDY: Well, you didn't, but you made  
22 findings against them.

23 THE COURT: The conduct of the lawyers is relevant  
24 and one of the factors to consider in determining the  
25 culpability of its client.

1 MR. KENNEDY: Exactly right.

2 THE COURT: But I never imposed sanctions on the  
3 lawyers themselves, and so --

4 MR. KENNEDY: No, you did not. But your final --

5 THE COURT: But the notice -- and the notice that I  
6 issued, I mean, it didn't mention the lawyers by name. But it  
7 says, paragraph 6, on the August 3, 2015 notice, "The purpose  
8 of the evidentiary hearing shall be to determine, one, if case  
9 terminating sanctions are appropriate based on the conduct of  
10 failing to disclose witnesses."

11 I was going to look at who had the duty to disclose  
12 and who failed to disclose without focusing at that point in  
13 time on whether it was the lawyers or the client, because I  
14 didn't know.

15 MR. KENNEDY: Correct. And ultimately the lawyers  
16 were found to have violated 3.3. What I'm saying is this, and  
17 if the lawyers were asked and they would agree with me, if the  
18 lawyers had realized that their conduct was at issue, if the  
19 Court had said, look, you guys are in jeopardy for 3.3  
20 violations, what would have happened -- and we generally  
21 allude to this in the motion. What would have happened is  
22 those lawyers would have said to the client, you have to get  
23 separate counsel, but because our conduct is at issue in this  
24 matter, you have to get separate counsel, we have to get  
25 separate counsel.

1           And if that had happened, I can't tell you precisely  
2 what would have happened at the hearing in the case, but I do  
3 enough of this work to know exactly what would have happened  
4 is Centennial's lawyers would have said to Mr. Bemis and  
5 Mr. Prangle, hey, the client didn't prepare these 16.1  
6 disclosures; no, the client did not.

7           In fact, you took all the information you had and  
8 you did it; that's right, you know, we did. And the same with  
9 the discovery responses that were verified by the client. I  
10 mean, the Court pointed that out. But the lawyers prepare  
11 those, and of course the client verifies them. But it's --  
12 those are all duties that the lawyers undertook.

13           And that brings us back around to the first point.  
14 Under the Young vs. Johnny Ribeiro factors, the Court has to  
15 decide, when the court looks and says who actually did these  
16 things, yes, the client can be punished for the shortcomings  
17 of the lawyers. But under the circumstances, is it fair to  
18 punish the client for those?

19           And our point here is this. In the absence of the  
20 showing of the intent of the wrongful state of mind and the  
21 purpose to harm the plaintiff, and the lawyer's conduct, which  
22 with respect to the items at issue was essentially lawyer  
23 conduct and lawyer judgments, re-evaluating the Young vs.  
24 Johnny Ribeiro factors, under that evidence and the proper  
25 legal standard, which is the one enunciated by Judge Hicks,

1 the evidence just isn't there to support this level of  
2 sanction.

3 The evidence certainly is there to support a lower  
4 level of sanction. And that was our bottom line, which is the  
5 dispute and the problem is the evidence that was lost. Well,  
6 that evidence is there in those police reports, and those are  
7 taken 30 days to 60 days after the events in question. That's  
8 the best evidence you're going to get on those points. It may  
9 not be as detailed as lawyers would get in depositions, but  
10 that's as fresh as that evidence gets.

11 The Court, if it wants to remedy the harm that  
12 occurred, can simply let those police reports come into  
13 evidence, and that goes a long way if not all the way toward  
14 remedying the problem that occurred here. And so bottom line,  
15 applying the -- I just said this, applying the correct legal  
16 standard, there's not enough evidence there.

17 THE COURT: So let me interrupt you for a second on  
18 the due process conflict of interest issue. Were you  
19 suggesting that if there had been different, let's call it  
20 better notice to defense counsel that their conduct would have  
21 been under scrutiny, then Centennial would have hired separate  
22 counsel, and they would have more aggressively presented its  
23 defenses that it did not have the culpable state of mind, that  
24 any wrongdoing here was that of its attorneys?

25 MR. KENNEDY: Yes. No question about that.

1           THE COURT: But couldn't -- are you then also,  
2 aren't you implying by that, that the Court somehow limited  
3 the ability of Centennial to put on that evidence? Because I  
4 didn't restrict them at the evidentiary hearing.

5           MR. KENNEDY: No, you didn't. I'm not faulting the  
6 Court. I'm not faulting the Court. What I'm saying --

7           THE COURT: I'm trying to find out what would have  
8 been different and why.

9           MR. KENNEDY: Here's what would have been different.  
10 And you start from the premise that the Hall Prangle firm  
11 would have immediately said, look, we have a conflict, because  
12 our -- under 1.7, because our conduct is at issue. And Mr.  
13 Prangle, if you asked him right now, would say I'd do what any  
14 other good lawyer would do, I would say, yeah, I'm accused of  
15 wrongdoing, you have to get separate counsel.

16           So here's what would happen. Centennial's lawyers,  
17 and I'll just put myself in that position, say if I was  
18 Centennial's lawyer, the allegations focus on the 16.1  
19 disclosure failures. The analysis then starts with the first  
20 question; whose failures are those, lawyer or client? Okay.  
21 And it's my view that those are obviously lawyer failures.  
22 The client's role is to make sure the lawyer has access to the  
23 information.

24           In this case you have two police statements and you  
25 have interviews in the C case, the prior case. The client has



1 done everything it can do. It's given all that information to  
2 the lawyers. There really isn't any other information out  
3 there outside of the interviews and the disclosure that, yes,  
4 we talked to the police.

5           So who then prepares the 16.1 disclosures which are  
6 found to be deficient in this case? It's the lawyers. That  
7 is 100 percent lawyer work, zero percent client work preparing  
8 the disclosure documents. The clients from the record have  
9 given the information to the lawyers that they should have  
10 given, and the lawyers had access to that and the lawyers  
11 decided what to disclose and what not to disclose.

12           The Court however found in its order that  
13 Centennial's fault was greater than the lawyer's in the 16.1  
14 disclosures. I don't -- I don't think the record supports  
15 that conclusion. The same is true, as I said earlier, with  
16 respect to discovery verifications. The lawyers prepare the  
17 documents, give them to the client to sign, and the client  
18 signs them. I mean, that's how the real world works.

19           And finally, the argument that was made in pleadings  
20 about on what date -- or what date -- at a certain time  
21 Centennial had no information leading it to believe that  
22 Mr. Farmer would commit this type of an act. That is a brief  
23 written by a lawyer saying based on the evidence that I see,  
24 here is the position I can take.

25           But the Court faults the client for that and says,

1 well, the client is really at fault. Now, if I have  
2 Mr. Prangle or Mr. Bemis on cross-examination, I would in a  
3 respectful and professional way point out that those are  
4 things that the lawyers did, not the client.

5 And so while the Court did not limit the lawyers in  
6 what they were doing, the lawyers didn't do that, and the  
7 reason is that the lawyers, when they didn't believe their own  
8 conduct was at issue, didn't tell Centennial go get yourself  
9 independent counsel, and the lawyers probably would have got  
10 themselves independent counsel. In fact, I'm 99 percent sure  
11 they would have, because good lawyers do that. And that's the  
12 significance there.

13 As to the lawyers themselves, I suspect that what  
14 those lawyers would have done, they would have got independent  
15 counsel, and independent counsel would have gone out and  
16 retained an expert to give an opinion. If they had been told  
17 your conduct is at issue under Rule 3.3, they would have gone  
18 and they would have gotten an expert.

19 And Rule 3.3 didn't get a lot of work and analysis  
20 in the case. But Rule 3.3(a)(1) has two parts to it. It says  
21 a lawyer won't present false evidence to a tribunal, and  
22 that's the part that the Court focused on and said, guys, some  
23 of this stuff was incorrect, your recollections about when you  
24 got information and who you got it from and when it was  
25 disclosed.

1 But the second part of 3.3(a)(1) says that a lawyer  
2 shall correct any misstatements that were made to the  
3 tribunal. An expert witness in this case, I am quite sure,  
4 would have looked at that and said, you know, that rule has  
5 two parts. If you make a -- you shall not make a mistake or a  
6 misrepresentation, but if you do, you must immediately  
7 correct it.

8 And what happened in this case? After lunch the  
9 lawyers came back -- and just as an aside, everybody who  
10 litigates has found themselves in this position, coming back  
11 and saying to the judge, boy, this morning I said A, B and C,  
12 now I've gone back and looked at these documents, it's  
13 actually D, E and F, and I was just mistaken.

14 That's what these lawyers did here, is they came  
15 back after lunch and they said, man, we were certain that this  
16 statement was in those materials that we got, and we've looked  
17 at it and it's not in there, and both of us absolutely  
18 believed that it was there and so we didn't receive it on that  
19 date, we got it on another date.

20 And if there's an expert witness who's going to talk  
21 about compliance or noncompliance with Rule 3.3(a)(1), I am  
22 certain that that expert witness would have said, yes, they  
23 failed to comply with it the morning, or maybe in some briefs  
24 that were filed, but then they came back and they corrected  
25 it.

1           And so you can fault them for being mistaken, but  
2   you really ought not fault them for trying to perpetrate some  
3   sort of a fraud on the Court, because during the effective  
4   cross-examination of the plaintiff's lawyers, they said, you  
5   know what, it's not there, we thought it was, but it's not  
6   there, so now we have to correct that error. So in answer to  
7   the Court's question, I think that's what happened.

8           THE COURT: How can you come in to court on the day  
9   of the evidentiary hearing, where the primary purpose of that  
10   hearing is to ascertain why a particular affidavit was not  
11   disclosed sooner, and still not know when your office obtained  
12   that affidavit? Isn't that very, very troubling to you?

13          MR. KENNEDY: It's troubling, and it's troubling to  
14   the lawyers too. I mean, when I read the transcript, I felt  
15   for Bemis and Prangle, because they're both saying we thought  
16   it was in that packet of stuff we got from Metro, we thought  
17   this was in there, it's not in there.

18          And I will tell you, Your Honor, that if they  
19   thought that they could say, and they didn't, but if they  
20   thought they could say that and that that would pass everybody  
21   by and be accepted, there's no way. Because you have a  
22   document, it's objectively verifiable that it's not there, and  
23   so you can't say it is and then it isn't.

24          And yeah, it is troubling. But both the lawyers  
25   admitted and said to the Court it was just an error on our

1 part, we thought it was there. Now, nobody looked for it to  
2 confirm that it was there, yeah, that's troubling. But when  
3 that's pointed out, they both say we thought it was and it's  
4 not. That is very troubling.

5 But again, two things, or first -- the first is the  
6 lawyers said it's a mistake, it's not something we did to try  
7 to harm the plaintiff. But secondly --

8 THE COURT: Could I -- well, go ahead. Go ahead,  
9 yes, please.

10 MR. KENNEDY: To go back, that's lawyer conduct.  
11 That sure as heck is not client conduct. It's not something  
12 that Centennial can be punished for because its lawyer says,  
13 look, I think it was in this packet of materials, and then the  
14 lawyer says, you know what, it's not. Now, you cannot  
15 attribute that to Centennial, because they didn't have  
16 anything whatsoever to do with that. And to their credit, the  
17 lawyers said that at the hearing. They said, look, this is  
18 us, this is our fault.

19 So bottom line on the record, on the evidence  
20 applying the correct corporate knowledge legal standard, the  
21 evidence is not there that Centennial had the requisite state  
22 of mind; meaning an intentional withholding for the purpose of  
23 harming the plaintiff. Secondly, the lack of notice to the  
24 lawyers that their conduct was going to be at issue operated,  
25 as I've said, effectively operated to keep those issues from



1 being fully developed before the Court.

2 If those issues had been set out and the lawyers had  
3 known, the lawyers surely without any question would have told  
4 Centennial you have to get separate counsel, and those lawyers  
5 would have got separate counsel as well. And I can tell the  
6 Court that because I do a lot of work in that area. You  
7 just -- good lawyers, and these guys are good lawyers, that's  
8 what happens in those situations.

9 And none of that happened here. I'm not faulting  
10 anybody for it. I'm just saying that the way things worked  
11 out, that was the effect. And taken together, those two  
12 things, I think, really ought to cause the Court to go back,  
13 to look at the evidence that was adduced and to enter a lower  
14 sanction in the case.

15 THE COURT: All right. Thank you very much. I  
16 appreciate --

17 MR. KENNEDY: Thank you, Your Honor.

18 THE COURT: -- your argument and respect your  
19 argument and your point of view. Thank you.

20 Let's hear from Mr. Keach.

21 MR. KEACH: Thank you, Your Honor.

22 THE COURT: You may have the same amount of time.

23 MR. KEACH: Thank you, Your Honor. Your Honor,  
24 before I get into the argument I prepared, I want to address  
25 two points.

1 THE COURT: Yes, sir.

2 MR. KEACH: The first is I'm sure Mr. Kennedy didn't  
3 intend to mislead the Court, but the findings of the Court as  
4 to the misstatements by Hall Prangle, that finding on page 25  
5 and 26 of the order didn't go to the they didn't disclose the  
6 statements in the packet in October 2014. The misstatement  
7 was they wrote in a brief that there was no possible way  
8 anybody would have known anything.

9 And they wrote it again in the writ, there's no  
10 possible way that anybody could have known anything. Those  
11 were the misstatements in light of the fact that Hall Prangle  
12 conceded they knew there were statements, at least it knew  
13 about the statements at least as of May 2013.

14 So the conduct that was inappropriate, the  
15 misstatements by Hall Prangle was not they didn't -- the part  
16 about they -- that they didn't disclose the document in the  
17 production. It was that they completely misled the Court and  
18 the Supreme Court when they said nobody in the world could  
19 have possibly known when they knew. The stuff about the we  
20 didn't have it in the file, that just showed that they  
21 continued to withhold the two most critical pieces of evidence  
22 in the case, which were the statements.

23 And the second thing I want to address before I get  
24 into my prepared argument is Mr. Kennedy repeatedly said and  
25 based his argument on the fact that the client, Centennial,

1 provided all the evidence they had, everything they knew to  
2 Hall Prangle. Where is that in the record? What witness said  
3 that? That's not in the record. That's what Mr. Kennedy  
4 wants to be able to argue so he can shift the blame to the  
5 lawyers.

6 And if in fact that's true, I don't know if it is or  
7 not because it's not in the record, nor does the Court know  
8 that, but if in fact that's true, it doesn't change the fact  
9 that Hall -- that the conduct of the client is -- of the  
10 lawyer is imputed to the client. And if Hall Prangle  
11 committed malpractice and they were told to do something and  
12 they didn't do it, the claim is not reconsideration. The  
13 claim is an action, direct action by Centennial against Hall  
14 Prangle.

15 THE COURT: But of course Mr. Kennedy's response to  
16 you would be that you have the burden of proof, and there --  
17 he would argue, I wouldn't say I agree with him, he would  
18 argue that where's the evidence in the record to show that  
19 particular Centennial employees had the culpable state of  
20 mind, so that we're not solely relying on imputation of  
21 culpability from the lawyers. That would be -- that's the  
22 real issue as he would frame it then.

23 MR. KEACH: Well, and where he's mistaken, Your  
24 Honor, is on two fronts. First, that's one factor under the  
25 Johnny Ribeiro test the Court's to consider. Okay. And the

1 court lists out in Johnny Ribeiro a whole list of factors, and  
2 other factors are such things as, well, what's the prejudice  
3 to the plaintiff. And while Mr. Kennedy suggests the only  
4 prejudice to us was we didn't get the statements and now we  
5 have them, as the Court found and as the evidence adduced at  
6 the hearing showed, there's a whole lot more that we lost.

7 Because all the witnesses, when Margaret Wolf said  
8 everybody was talking about it, we lost all those everybodies  
9 [sic] and what they knew. And we lost the ability as the, I  
10 forgot his name, the other lawyer, the second witness that  
11 testified from Hall Prangle, when he said, Yeah, we tried to  
12 identify who the victim was in the Murray affidavit and we  
13 tried to identify all the stuff, all that was lost.

14 So it's not just the statements cure it. All the  
15 information, what actually happened in that room within the  
16 Murray statement, what everybody else was talking about, who  
17 all at the hospital knew when Margaret Wolf said everybody was  
18 talking about it, all that's lost, because --

19 THE COURT: I understand. You can move on from that  
20 argument.

21 MR. KEACH: Thank you. Your Honor, facts and legal  
22 arguments that could have been raised but were not are waived,  
23 and are not appropriate for a motion for reconsideration.  
24 Valley Health knows this better, knows this law better than  
25 most. One of their lawyers, Mr. Kennedy, tried to get

1 reconsideration in Bahena v. Goodyear. The Court found there  
2 were no grounds for reconsideration, and issued an opinion  
3 only to clarify and reiterate the law.

4 And Mr. Kennedy also knows that in Bahena the court  
5 found that the sanction is only striking the answer as to  
6 liability and defendant still gets to argue damages. An  
7 evidentiary hearing under Young v. Ribeiro is not required,  
8 and there's no need to go through the factors such as degree  
9 of willfulness. For some unexplained reason, even though  
10 Bahena is the seminal case, Valley Health decided not to argue  
11 Bahena even after we brought it up in our brief.

12 Here everything raised in the motion for  
13 reconsideration could have been raised at the hearing. The  
14 collective knowledge doctrine is just another legal theory  
15 regarding the facts detailed in our hearing brief that the  
16 Court found to be true. It could have been raised but was  
17 not. It's waived.

18 The same is true of the due process argument. We  
19 made clear in our hearing brief that we felt Hall Prangle's  
20 conduct violated the rules of professional conduct,  
21 specifically Rule 3.3, and detailed the basis for that, which  
22 the Court again found to be true.

23 If Hall Prangle thought this Court needed to do  
24 something more as far as putting them on notice, they should  
25 have raised the issue. They didn't. That too is waived. And



1 so it is with all their arguments, Your Honor. They're truly  
2 just rearguing the same facts with theories they should have  
3 used the first go-around but didn't.

4 Now, the conflict, this argument has to be abandoned  
5 when Hall Prangle represents, still represents Valley Health.  
6 It's hard to argue Valley Health would have gotten its own  
7 lawyer or Hall Prangle would have gotten its own lawyer if  
8 they knew about the conflict when they know everything now,  
9 and here's Hall Prangle, no lawyer, and we're talking about  
10 conflict and they're signing the same pleadings.

11 Nobody switched off because of this. They didn't do  
12 it then, they haven't done it now. But more importantly, Your  
13 Honor, where is the evidence? The only thing you have is  
14 Mr. Kennedy's argument. We don't have any evidence. Of  
15 course, that's what the Court had in its 39 page order,  
16 evidence, and that's what the decision was based on, evidence.

17 Now, they also argued that Rob was dilatory. Of  
18 course that argument was abandoned, because as we provided in  
19 our opposition, Rob took over 50 depositions and Hall Prangle  
20 didn't take one. Now, it's kind of hard -- and then  
21 Mr. Prangle conceded in his argument that no one could have  
22 known to take the depositions of Murray, Wolf and Sumera about  
23 the stuff in those statements before knowing the import of  
24 their testimony.

25 Now, the Metro declarations, not newly discovered.

1 He was known and disclosed long before the hearing. For some  
2 reason they decided not to bring him in.

3 Reconsider -- this reconsideration is under 2.24(a),  
4 not a Rule 59(e) motion, as they want to describe it. AA  
5 Primo v. Washington, the case they rely on, stands for the  
6 proposition that a post trial motion to amend or reconsider is  
7 a Rule 59 motion regardless of what it's called. It doesn't  
8 say a motion to reconsider an interlocutory order as a Rule 59  
9 motion.

10 Likewise Trayl v. Faretta [phonetic] has nothing to  
11 do with an EDCR 2.24 motion to reconsider. Rather, points or  
12 contentions not raised or passed over in silence in the  
13 original hearing cannot be maintained or considered on  
14 petition for rehearing. Now, that's the law as stated in  
15 Achrem v. Expressway Plaza, 112 Nev. 737. That's undisputed.

16  
17 The Metro officer's testimony, if relevant, should  
18 have been provided at the evidentiary hearing, not now.  
19 Further they argue, well, we got in our depositions, and so  
20 it's -- but that's just not a viable argument. First, the  
21 declaration is not the same as the depositions. They have  
22 to -- there was an opportunity to cross-examine.

23 Second, Mr. Prangle stipulated to the use of  
24 depositions in this case to save time and expense. In fact,  
25 all of our exhibits were stipulated to. So what did the Metro

1 officer say? He said generally he would not give the hospital  
2 statements. There are three things wrong with that, Your  
3 Honor. First, he doesn't say he didn't give the statement to  
4 them, just he generally would not. So we don't know if he  
5 gave it to them or not in this case.

6 Second, he doesn't say he didn't give it to anyone  
7 else, like Murray or Farmer or Wolf or another hospital  
8 witness when he was interviewing them, any one of whom could  
9 have given it to Butler. Third, he doesn't say there's no way  
10 Butler could have gotten the statements. What we know from  
11 Murray, Butler had read and discussed her statement. We also  
12 know Butler cannot remember if she had it or not. She doesn't  
13 say she didn't. She says she didn't remember.

14 We know from Bachanek [phonetic] she knew all about  
15 Wolf's statement to the police, and all of this was by August  
16 2008. We also know Hall Prangle interviewed Murray, Wolf and  
17 Sumera in 2008. Prangle told -- Mr. Prangle told the Court  
18 specifically that Hall Prangle met with Wolf in mid June 2008.

19 Now, here's where it gets good, Your Honor. Now  
20 they contend those interviews were only in conjunction with  
21 the Cagnina case. Okay. But so what. The information in  
22 both cases was the same foreseeability. So what's relevant in  
23 Cagnina was relevant in our case. But it's maybe even more  
24 interesting, Your Honor, considering Nurse Wolf had nothing to  
25 do with Cagnina.

1           At her deposition Nurse Wolf testified she didn't  
2 even know who Cagnina was, and she wasn't her patient. So the  
3 only reason, the only reason Hall Prangle would have  
4 interviewed Wolf was because Wolf made a statement to the  
5 police. Wolf has nothing else to do with the case.

6           THE COURT: So you're focusing so far on Hall  
7 Prangle's knowledge of the existence of a statement and when  
8 they knew the statement. But that's not really --

9           MR. KEACH: I'm going to get there, Your Honor.

10          THE COURT: -- zeroing in on the issue that was in  
11 your brief about how you now attribute that fault to  
12 Centennial.

13          MR. KEACH: Well, Your Honor, first off I wanted to  
14 argue stuff that wasn't in the brief, because we're still  
15 relying --

16          THE COURT: Well, that's fine too.

17          MR. KEACH: We're still relying on that brief.

18          THE COURT: And I've read everything in the brief,  
19 so.

20          MR. KEACH: And so I do want to do that.

21          THE COURT: Okay. Go ahead.

22          MR. KEACH: But Your Honor, it is important that  
23 Hall Prangle interviewed Wolf, who made a statement to the  
24 police in 2008, and Wolf had nothing to do with Cagnina. So  
25 why are they interviewing Wolf? Wolf had one thing to do in

1 the case. Wolf made a statement to the police, and there's  
2 nothing counsel is going to be able to argue to get around  
3 that point. They interviewed a witness who only had one piece  
4 of relevant testimony; statement to the police, and that's in  
5 2008.

6 Now, the substance of the Murray, Wolf and Sumera  
7 statements and the fact they had given statements was not  
8 disclosed to Cagnina's lawyers either. Hall Prangle admitted  
9 they were aware staff had given statements to Metro in 2008.  
10 Your Honor, it's reasonable to conclude that when they  
11 interviewed the witnesses, particularly Wolf, they talked  
12 about the statements.

13 What Valley Health wants this Court to do is ignore  
14 its common sense and conclude that even though Hall Prangle  
15 knew about the statements when they met Wolf and Murray, they  
16 didn't discuss them. Now, that's circumstantial evidence.  
17 And of course, we would suggest Valley Health doesn't  
18 understand the concept of circumstantial evidence, Your Honor.  
19 Obviously we don't have Butler Prangle saying let's hide the  
20 evidence. You never have that in the case. We don't have  
21 direct evidence of willfulness.

22 On the contrary, we have circumstantial evidence  
23 which was fully detailed by the Court in the factual findings,  
24 in Numbers 20 through 85. Your Honor, I can go through and  
25 read them. Do you want me to say what evidence we presented?

1 The Court's already found it. I went back and read the order.  
2 I can't say it any better than what the Court said in its  
3 findings, particularly Numbers 20 through 85. You detail  
4 everything that everybody knew and when they knew it and how  
5 they knew it. Circumstantial evidence is as good as direct  
6 evidence.

7 But, Your Honor, here's where I disagree with  
8 Mr. Kennedy, and that is when he says we have to show a  
9 purposeful concealment by Centennial. That's not the law.  
10 They cite Richardson, Clark County School District vs.  
11 Richardson, Golden Nugget Las Vegas v. Service Control, and  
12 Nevada Power v. Fluor [phonetic], all for the proposition that  
13 there needs to be a willful intent. Those cases, Your Honor,  
14 were brought under 37(b)(2). Our hearing, our motion was  
15 brought under 37(c)(1).

16 C-1 states, A party that without substantial  
17 justification fails to disclose information required by Rule  
18 16.1 is not permitted to use as evidence at trial, at a  
19 hearing or on any motion or any witness or information not so  
20 disclosed. In addition to or in lieu of this sanction, the  
21 court on motion and after affording an opportunity to be  
22 heard, may impose other appropriate sanctions, and these  
23 sanctions may include any of the actions authorized under Rule  
24 37(b)(2)(A), (B), and (C).

25 Well, what's the standard there? The party without



1 substantial justification fails to disclose information,  
2 that's what the rule is. And there has been no justification.  
3 And that rule is different, Your Honor, than (b)(2), because  
4 16.1 applies to parties and lawyers. It's not just lawyers.  
5 It's parties and lawyers.

6 And 16(c)(1) says the party without substantial  
7 justification. The lawyer didn't do it is not substantial  
8 justification, Your Honor, because that's the only argument  
9 Mr. Kennedy has; the lawyer didn't do it, therefore it's not  
10 substantial justification.

11 Your Honor, this Court struck Valley Health's  
12 answer, but allowed them to argue damages. Now, that's  
13 exactly what the court did in Bahena. And I presume the Court  
14 looked at Bahena and considered that when it enters its order.  
15 Now, there our court made clear that as long as the defendant  
16 got to argue damages this was not a case concluding sanction.

17 So while the hearing was to determine whether case  
18 concluding sanctions should be imposed, the court didn't grant  
19 case concluding sanctions. Just as Bahena said, finding  
20 liability and allowing them to argue damages are not case  
21 concluding sanctions. And that's why in Bahena, Your Honor,  
22 when that's what the lower court did, they imposed a sanction  
23 of finding liability, but allowed them to argue damages.

24 The court in Bahena said you don't even have to have  
25 an evidentiary hearing. You don't even have to go through

1 Johnny Ribeiro factors. None of that matters. In fact, it's  
2 such a lesser standard that we don't even review it under the  
3 same standard because it's not a case concluding sanction.  
4 Well, that's important, Your Honor. Because if they aren't  
5 case concluding sanctions, you don't even go through the  
6 factors. What you go through, what you determine is was the  
7 appropriate sanction based upon the violations.

8 Now, what this Court did, to its credit, you did go  
9 through the Johnny Ribeiro factors, and you went through each  
10 one of them and you went through it in detail, and you  
11 detailed it in your order. So when you did that, Your Honor,  
12 what Johnny Ribeiro says, the factors the court may properly  
13 consider include but are not limited to the degree of  
14 willfulness of the offending party. Not whether it was  
15 purposeful, not whether the -- that there was a malicious  
16 intent, and then it goes through the other factors.

17 Now, in arguing the collective knowledge doctrine,  
18 Valley Health focuses on one of the factors; the degree of  
19 willfulness. Young doesn't say sanctions cannot be imposed  
20 unless the court finds the conduct was intentional and  
21 malicious. Young only says the degree of willfulness of the  
22 offending party may be considered.

23 Every case relied upon by Valley under the  
24 collective knowledge doctrine dealt with malicious intent,  
25 Your Honor. Valley Health argues this Court could not enter

1 these case concluding sanctions -- could not enter these non  
2 case concluding sanctions unless it found malicious intent.  
3 That's not the law. Johnny Ribeiro says all you have to do is  
4 consider a degree of willfulness.

5 Judge Hicks tells us what the collective knowledge  
6 doctrine is. Quoting, The collective knowledge doctrine  
7 favors liability where corporate agents have different pieces  
8 of information, but the corporation was negligent in compiling  
9 these pieces of information.

10 Basically, Your Honor, the collective knowledge  
11 doctrine is like baking a cake. You have flour, you have  
12 milk, you have sugar, you have eggs. You take each piece,  
13 each separate and distinct ingredient, you put them together,  
14 bake them, you can have a cake. Without combining them you  
15 don't have a cake. If you leave out one, you don't have a  
16 cake. Well, that's not what we have here.

17 We don't have separate pieces the combination of  
18 which are needed to show degree of willfulness. If Bachanek  
19 was not involved, only Butler, we still have shown corporate  
20 culpability. Butler knew of Murray, Wolf and Sumera. The  
21 party has a duty to disclose. She did not. She knew they  
22 went to the police and made statements. She knew this was in  
23 management -- she was in management capacity.

24 They all interviewed Wolf about the statement, but  
25 no one disclosed the existence of the statement. Mr. Bemis

1 and Mr. Prangle each knew in 2013 about Murray and her  
2 statement. And probably, I don't know about Bemis and Mr.  
3 Prangle specifically, but somebody at Hall Prangle knew about  
4 the statements in 2008, because they said that they knew there  
5 were police statements.

6 The real argument they should have made was that the  
7 evidence was cumulative, because we didn't need to show all of  
8 this in order to prove it. Because what Bemis knew or what  
9 Mr. Prangle knew or what Hall Prangle the lawyer knew, any one  
10 of those was sufficient to impose the sanctions that the Court  
11 did. What the Court -- what Valley Health is really arguing,  
12 the Court should not have made the findings.

13 Because what they say in the brief is the  
14 determinative issue is whether the record contains clear and  
15 convincing evidence proving that Centennial willfully  
16 intentionally concealed the relevance of Nurses Murray, Wolf  
17 and Sumera, the existence of police statements with intent to  
18 harm and unfairly prejudice. And what they really want you to  
19 do, Your Honor, is just change the factual findings. The  
20 findings are true. There's nothing to change. Everything you  
21 found was supported.

22 Your Honor, I want to go on to the due process, and  
23 again, that's briefed in our opposition. In the 2011 Third  
24 Circuit case relied upon by Valley Health, Adams v. Ford  
25 Motor, a lawyer contacted a juror after a trial.

1           THE COURT: Let me just interrupt you for a second,  
2 because I did receive a note that my evidentiary hearing that  
3 was scheduled for 10:00 is not going forward, just the DA will  
4 need to put a continuance on the record. So we have less  
5 pressure to wrap it up. But I wanted Mr. Kennedy to know that  
6 he can have -- he's going to have a few minutes on reply of  
7 course.

8           MR. KEACH: Thank you, Your Honor.

9           THE COURT: Go ahead and proceed.

10          MR. KEACH: A lawyer in Adams v. Ford Motor Company,  
11 a lawyer contacted a juror after a trial. The juror thought  
12 the contact was harassing and notified the judge. The judge  
13 ordered all the lawyers to come to court the very next day to  
14 explain without briefing --

15          THE COURT: Hold on a second. The marshals look  
16 like they're trying to decide what to do over here. Is the  
17 defendant present?

18          THE MARSHAL: Oh, yeah. We're going to take him  
19 back, yes.

20          THE COURT: Okay. He doesn't need to be present  
21 for -- is the DA in the back?

22          UNKNOWN SPEAKER: Yes, Your Honor.

23          THE COURT: We don't need the defendant present for  
24 the continuance, do we?

25          UNKNOWN SPEAKER: I would agree with that.

1           THE COURT: All right. So you can go ahead and let  
2 him go. Thank you.

3           Mr. Keach, I apologize for the delay. Continue on  
4 focus now.

5           MR. KEACH: Thank you, Your Honor. The lawyer  
6 contacted a juror after trial. The juror thought the contact  
7 was harassing and notified the judge. The judge ordered all  
8 of the lawyers to come to court the very next day to explain,  
9 without briefing or witnesses, after which the judge found the  
10 lawyer violated Rule 3.5.

11           The Third Circuit found a violation of due process  
12 because, and I'm quoting, "Colianni had no notice, much less  
13 particularized notice about the potential sanctions he faced  
14 prior to the judge's order finding that he engaged in  
15 misconduct. A review of the hearing transcript makes clear  
16 the judge never even hinted that Colianni would be subject to  
17 sanctions.

18           "In addition to the lack of notice, we find that  
19 Colianni did not have sufficient opportunity to be heard.  
20 Since the judge did not hold an evidentiary hearing, Colianni  
21 was not given the chance to present any witnesses to testify  
22 on his behalf. Moreover, the judge did not question the juror  
23 who complained about his conduct. Accordingly, we find that  
24 the district court violated Colianni's due process rights by  
25 failing to provide him sufficient notice and an opportunity to



1 be heard."

2           Okay. First off, the Court didn't impose a sanction  
3 on Mr. Prangle and Mr. Bemis. What the Court did was find --  
4 was make factual findings there were misrepresentations. It's  
5 at the bottom of page 25 and top of page 26, a couple of your  
6 findings. The Court then said, These findings are violations  
7 of Rule 3.3. That's not a sanction, first.

8           Second, unlike, unlike the Ford Motor Company case,  
9 the factors relied upon in the Third Circuit are not present  
10 here. Here they did have notice. We gave it to them. We  
11 filed a Rule 37 motion. We advised the Court of Valley  
12 Health's and Hall Prangle's misconduct. We advised the Court  
13 and Hall Prangle we were asking the Court to find a Rule 3.3  
14 violation on page 9 of that evidentiary hearing brief, and  
15 then proceeded to document the false statements.

16           Your Honor, in this -- in this motion right now, how  
17 am I to know that they are challenging the Court's order based  
18 on due process? Because the Court told me that they were  
19 challenging on due process? No. Because they filed a motion  
20 and say here are the issues that we're presenting we're asking  
21 the Court to consider; due process, collective knowledge  
22 doctrine.

23           Well, how does Mr. Prangle and Mr. Bemis know that  
24 we're talking about Rule 3.3? Because the Court advised them?  
25 No. In our moving papers we let them know we're looking at

1 3.3 and are advising the Court they violated. And of course  
2 we had told them that in two prior occasions, which we detail  
3 in our opposition. So when they say they didn't know that 3.3  
4 was an issue, it's just not true. It's just not true.

5 So they had notice. And unlike Colianni, Hall  
6 Prangle also had an opportunity to be heard, because those --  
7 the court found in that Third Circuit case not only did they  
8 not have notice, they didn't have an opportunity to be heard.  
9 Well, here Hall Prangle had an evidentiary hearing.  
10 Mr. Prangle was listed as a witness when the Court asked the  
11 parties to supply names of witnesses. Hall Prangle on behalf  
12 of Valley Health was the one witness, Mike Prangle.

13 But do you recall what happened? After Mr. Bemis  
14 went through what he went through, Mr. Prangle said, I'm not  
15 going to testify. And I don't blame him. I wouldn't want to  
16 go through that either. I wouldn't want to have to tell this  
17 Court what really happened. I wouldn't want to have to tell  
18 this Court when we knew what we knew under oath. He declined  
19 to testify. He declined to call any witnesses. That doesn't  
20 mean he didn't have an opportunity to be heard. They did.

21 Now, the arguments that they would have had lawyers,  
22 there's no evidence to that. What the evidence is, is what  
23 actually happened. What happened is we're still arguing about  
24 the conflict and they still don't have lawyers.

25 Now, at page 10 of their motion, Valley Health says

1 Wolf's statement was first disclosed in this matter by  
2 plaintiff in March 2015, in its 25th supplement dated March  
3 19, 2015. That's true. What's suggested by that statement  
4 but is not true is that Hall Prangle never had the statement  
5 until then, when it is a fact that it had it and read it at  
6 least as of May 2013.

7 They interviewed Wolf back in 2008, when she wasn't  
8 Cagnina's nurse, and the only reason they talked to her was  
9 because of what she told police. Even Mr. Prangle admitted in  
10 his closing argument at the hearing they knew of Murray's  
11 statement in May or February 2013, and conceded they had  
12 Wolf's in May 2013.

13 He should have disclosed Wolf as soon as he got the  
14 statement. And he said, Well, I accept that it was May 2013  
15 we had it. So they're not denying they had it in May 2013.  
16 The record is uncontroverted, because Mr. Prangle conceded  
17 that we had it as of May 2013.

18 Mr. Prangle admitted, when he advised the Court in  
19 his October 2014 opposition to motions for summary judgment,  
20 in that where he said that they absolutely no known prior  
21 acts, that the statement was made with full knowledge of the  
22 Wolf and Murray statements. And then he repeated that same  
23 misrepresentation to the Nevada Supreme Court.

24 Those were the false and misleading statements in  
25 violation of Rule 3.3, exactly as we argue in their brief, and

1 he admitted it was his decision, not his client's. But now  
2 the client wants to blame the lawyer. There's a remedy for  
3 that. It's called file a lawsuit for malpractice if that's  
4 what you really believe. They selected their own lawyer. We  
5 didn't pick him for them.

6 The problem with this case is, Your Honor, and their  
7 problem is this Court heard the witnesses, saw the witnesses,  
8 listened to the testimony and considered everything, and when  
9 they did that -- and when the Court did that, it made factual  
10 findings. And those findings, every one of them are supported  
11 in the record and will not be reversed, because they're all  
12 true and they can't get around that. And what those findings  
13 show is exactly what the Court concluded in its order, and  
14 they can't get around that.

15 The truth is, in my opinion, Valley Health and their  
16 lawyers tried to game the system. They bet we would never  
17 catch them, and they lost. Who would have ever predicted that  
18 Rob would do a FOIA request to the PD's office and get the  
19 emails between Hall Prangle and the PDs about the nurses'  
20 statements to Metro? Because that's when it all started.

21 Now, who would have dreamed they did that? They  
22 were in control of the evidence. As long as they didn't give  
23 it to us, there's no way we're going to get it. But that's  
24 how they got caught. This Court heard and saw the testimony,  
25 judged the credibility of the witnesses and the lawyers, and

1 this Court made the findings, none of which are subject to  
2 challenge.

3           These were not case concluding sanctions under  
4 Bahena. And a Young v. Ribeiro hearing and analysis was not  
5 even required, but you did one, and it cannot and will not be  
6 disturbed on review. Valley Health gambled and they lost.  
7 Sometimes that happens in Las Vegas.

8           THE COURT: Thank you, Mr. Keach.

9           All right. Mr. Kennedy.

10           MR. KENNEDY: I'll respond to the arguments that  
11 Mr. Keach made generally in the order that he made them.  
12 First off, with respect to the re-hearing, re-hearing's proper  
13 if there's been a manifest misapprehension of fact or an error  
14 of law. And what we set out was we said, look, it appears as  
15 though the standard that the Court applied was the incorrect  
16 standard, the corporate knowledge standard.

17           And secondly, with respect to the conflict of  
18 interest, that didn't actually come up until after the  
19 decision that the Court made. With respect to that you're  
20 correct. You didn't sanction the lawyers in terms of imposing  
21 a monetary sanction against them. What happened was the Court  
22 found that the lawyers had violated the rules of professional  
23 conduct. That in itself is a sanction against the lawyers.  
24 It's an adverse finding.

25           I can go down that road with you and tell you that

1 now when they renew their malpractice insurance, have you ever  
2 been sanctioned by a court, the answer's going to be yes, we  
3 were found to have violated Rule 3.3, we didn't have to pay  
4 any money or any penalty, but there was a finding against us  
5 that we violated the rule of professional conduct. That in  
6 itself is a sanction. But that violation was then imputed to  
7 the client, so the client suffered the sanction from the  
8 lawyer's violation of the rule. So yes, there was a sanction.

9           Number 2, the remedy. Mr. Keach says, well, the  
10 remedy here is malpractice. Well, that's getting a little far  
11 down the road. The remedy here is for the Court to reconsider  
12 what it did and apply the correct legal standard to it, the  
13 correct corporate knowledge doctrine, and decide whether or  
14 not there was an insufficient notice that the rules of  
15 professional conduct would be at issue. So the remedy's not  
16 malpractice. The remedy is to go back and reconsider what was  
17 done.

18           Third, again issue is taken with the statements.  
19 Mr. Keach says, well, really the sanction was for the  
20 statements that based on the evidence there was no way to know  
21 that there was a likelihood that Mr. Farmer would commit this  
22 sort of an act. Now, the Court actually faced that issue in  
23 the motion for summary judgment, and in footnote 76, on page  
24 20 of our motion the Court addressed that.

25           And the Court not only didn't sanction Centennial's



1 lawyers for it, the Court found that that presented a genuine  
2 issue of material fact for the jury to decide. So the  
3 argument that the sanction was actually imposed for that  
4 statement really is not a valid one, because the Court had  
5 looked at that and had said that's an issue of fact, whether  
6 or not there was sufficient evidence to put Centennial on  
7 notice.

8 Now, Centennial of course arguing that said there's  
9 no way we would have known. Well, it was a fact issue, and I  
10 doubt the Court intended to sanction Centennial for that  
11 conduct.

12 THE COURT: Of course, when I addressed that issue  
13 the first time it was in context of determining if there was a  
14 question of fact as to notice on one of the elements of the  
15 claims being presented, not on the issue of what weight I  
16 should give it in determining the state of willfulness when  
17 combined with all the other evidence in the case.

18 MR. KENNEDY: And I understand that.

19 THE COURT: So two completely different analyses  
20 when I considered that piece of evidence.

21 MR. KENNEDY: Okay. But we're dealing with the  
22 argument there's -- and I'm paraphrasing, there's no way we  
23 would have known based on that same quantum of evidence that  
24 was there. And so to argue that someone ought to be  
25 sanctioned for making an argument off of the evidence, I don't

1 think that's what the Court did in this case. And the basis  
2 for that was, just to encapsulate it, was we didn't know until  
3 we received a complaint in the C case of this sort of conduct.

4 Yes, some -- there had been discussion among the  
5 employees about Farmer being too attentive and that sort of  
6 stuff. But that's all that was. There wasn't any notice  
7 saying, hey, beware of this guy, he may perpetrate some sort  
8 of assault. So there is that question of fact as to whether  
9 or not somebody's saying, you know, this guy's a little too  
10 attentive rises to the level of notice of a propensity to  
11 criminal activity.

12 Next, the declaration of -- that we put in from the  
13 police officer. The Court makes a finding that says it is  
14 undisputed that Butler knew about and saw the Murray  
15 statement. Now, all Butler said was, look, I don't -- I just  
16 do not remember that. Okay. Which is a truthful answer  
17 several years later.

18 And the Court says, well, it's undisputed that  
19 Murray had the statement and Butler had seen it. This is the  
20 one point where we actually went outside the record and said,  
21 wait a minute, that factual finding by the Court is very  
22 likely incorrect.

23 And we went back, and it's Exhibit 4 to the motion,  
24 which is the declaration of the Metro officer, and he says,  
25 look, we don't give out statements regularly to witnesses, I

1 was in charge of the case and I have no recollection of doing  
2 that, and there's no notation in the file that that was done.  
3 And so while Murray says, gee, I think Butler saw that, Butler  
4 says I have no recollection of that, and the police officer  
5 says it's just not what we would do --

6 THE COURT: But when I issued my order, I had to go  
7 by the record that was before me, and I didn't have anything  
8 controverting the Murray statement.

9 MR. KENNEDY: That's right. And what we have in  
10 that case is we went outside and brought evidence in saying,  
11 look, that's a clearly mistaken factual finding. And what you  
12 had was you had somebody say I think that I had my statement  
13 and showed it.

14 Of course Murray didn't have a copy of the statement  
15 and say, look, here it is, I had it, and Butler says, well, I  
16 sure don't remember that. And so we went out and got the  
17 police officer to say that is extremely unlikely, and we do  
18 that to just simply to address the factual finding --

19 THE COURT: I understand that.

20 MR. KENNEDY: -- and to say to the Court, in light  
21 of the declaration of the police officer, very unlikely that  
22 that happened.

23 And I know the Court said based on the evidence it's  
24 undisputed, and we went out and said we think that is  
25 clearly a -- in light of that new evidence it's clearly a

1   misapprehension.

2           THE COURT:  Of course there was other evidence that  
3   I considered as well, including Mr. Bemis's representation to  
4   the discovery commissioner that he was aware of several police  
5   statements as far back as 2009, or that his firm was aware.

6           MR. KENNEDY:  Yeah.  And that, of course, I assume  
7   that that is correct, they had interviewed witnesses.  And he  
8   can say, look, we were aware that they had been given to the  
9   police, but that's different than having the statements.

10          THE COURT:  I understand, of course.  Okay.  You can  
11   wrap it up, if you would.

12          MR. KENNEDY:  Next, why was Wolf -- I will.

13          THE COURT:  Okay.

14          MR. KENNEDY:  Why was Wolf interviewed?  Wolf was  
15   working in the emergency room when Patient C was transferred.  
16   And so Wolf had information about Patient C.  The argument is  
17   that, well, you'd only interview her because of the Doe party.  
18   She was interviewed because she was working when Patient C was  
19   there.

20                 As to the matter of the willfulness that's required,  
21   on page 23 of our motion we quote both the Clark County School  
22   District and the GNLV cases, and they say there has to be some  
23   degree of willfulness.  And willfulness means more than  
24   intent.  Intent to do an act means doing an act for a purpose.  
25   And in this case the purpose has to be to hide evidence, to

1 interfere with the litigation to harm the plaintiff.

2 Bahena involved willful acts, not negligent acts.

3 Bahena involved -- the principal wrongdoing was the party who  
4 didn't show -- the Goodyear party who didn't show up for his  
5 deposition after having been ordered to do so. And we know  
6 that if you look at the opinion denying rehearing, Justice  
7 Gibbons says, look, this was a case where a guy was ordered to  
8 show up for his deposition and didn't show up.

9 So, you know, the sanctions are all there. That is  
10 clearly a willful act designed to interfere with the  
11 litigation. It's not an act where somebody makes an error and  
12 later comes back and says I had the date wrong or something  
13 like that. Somebody who just doesn't show up. And unless the  
14 Court has questions, I'm done.

15 THE COURT: I appreciate your argument. It is very  
16 enlightening. And I respectfully appreciate argument from  
17 both sides. In a complex and very serious matter such as  
18 this, I want to make sure that I fully vetted all the  
19 arguments and thought of them carefully, and it's always  
20 important to reflect at least overnight on a case like this.

21 So I'm going to take this under advisement and  
22 you'll have a decision very soon. I understand that we have a  
23 trial date of January 4, and given the -- given, you know, the  
24 urgency of a decision in this, I will have it this week, and  
25 my guess would be by Wednesday.

1 MR. KEACH: Thank you, Your Honor.

2 MR. KENNEDY: Thank you, Your Honor.

3 THE COURT: Thank you. Anything -- when do we see  
4 you all next? I know you have a lot of motions you've been  
5 filing, motions --

6 MS. BROOKHYSER: The 14th, I believe, Your Honor.  
7 We have some MSJs on.

8 THE COURT: All right. Thank you very much,  
9 Counsel.

10 MR. KENNEDY: Thank you, Your Honor.

11 MR. KEACH: Your Honor.

12 THE COURT: Yes, sir.

13 MR. KEACH: Can I just address one thing?

14 THE COURT: We're still on the record. Is it  
15 procedural or substantive?

16 MR. KEACH: It's procedural, Your Honor.

17 THE COURT: All right. Mr. Kennedy, Mr. Keach has  
18 something to address.

19 MR. KENNEDY: Okay.

20 THE COURT: Let's hear what he has.

21 MR. KEACH: Just something about scheduling, Your  
22 Honor.

23 THE COURT: Yes, sir.

24 MR. KEACH: The Court late last week sent out an  
25 order scheduling the pretrial, I believe it was, for



1 December 23. Excuse me, the motions in limine for December  
2 23.

3 THE COURT: Yeah. And that's in part because I have  
4 this two week murder trial that starts now, and I'm pretty  
5 busy.

6 MR. KEACH: Your Honor, the problem -- and that's a  
7 Wednesday. The problem for me is I'm flying out December 22,  
8 and I was going to ask the Court is it possible that we could  
9 have the hearing on the motions on Monday, perhaps even Monday  
10 afternoon, if the Court has a busy calendar Monday morning.  
11 But there's no possible way I can be here.

12 THE COURT: All right. Well, let me hear from  
13 Mr. Kennedy, or who else on this side wants to address that?

14 MR. PRANGLE: That would be the 21st?

15 MR. KEACH: Yeah. Monday, the 21st.

16 THE COURT: I mean, I might be able to move it to  
17 the 21st.

18 MR. PRANGLE: I believe I can be here on the 21st,  
19 Judge.

20 MR. KEACH: Thank you, Mr. Prangle.

21 THE COURT: Well, I didn't make that decision yet.  
22 I'm thinking.

23 MR. KEACH: But I was thanking Mr. Prangle for his  
24 concession.

25 THE COURT: Oh, okay. So let me check with the

1 clerk. How does Monday look? I know that we expected that  
2 trial to roll into the Monday, Tuesday. That's why --

3 How much time did you anticipate arguing? We have a  
4 lot of motions. And what I'll probably do on the motions in  
5 limine, most likely I will issue my tentative rulings in  
6 writing as to each of those and you'll have those the Friday  
7 before, and that would probably greatly shorten the arguments  
8 on those. But then we also have some summary judgment  
9 motions.

10 MR. PRANGLE: I know the one that we did Mr. Murdock  
11 filed a non-opposition to. So I believe ANS has more  
12 meaningful ones.

13 MS. BROOKHYSER: There's an ANS MSJ, Your Honor, and  
14 there's also one that the plaintiff filed.

15 THE COURT: Do you think we could get through  
16 everything in about an hour, hour and a half on Monday?

17 MS. BROOKHYSER: I believe those motions are being  
18 set -- are being heard on the 14th, Your Honor. So the  
19 motions in limine hearing doesn't affect that.

20 THE COURT: Well, it was possible that my JEA was  
21 going to move anything that was set for the 14th, so  
22 everything to the 23rd. The 14th is not a good day for us.

23 Is that correct?

24 THE CLERK: The 14th still has the summary judgment  
25 [inaudible].

1 THE COURT: What day of the week is the 14th?

2 THE CLERK: It's a Monday, Your Honor.

3 THE COURT: So that's a week from today? Well, all  
4 right. You know what. Let's try to keep those set just so we  
5 don't have way too much on the 21st. And I guess I'll have to  
6 start my trial at 10:30. So you guys will have about an hour  
7 and 15 minutes tops on that summary judgment on the 14th.

8 All right. And so I will, if there's no strong  
9 opposition, I will go ahead and move the hearing on the  
10 motions in limine to the 21st. Can we start at 8:30 in the  
11 morning?

12 MR. KEACH: No problem, Your Honor.

13 MR. PRANGLE: Yes. No problem.

14 THE COURT: 8:30. All right. That will be the  
15 order then. Thank you.

16 MR. BIGGAR: Your Honor, before we go off the  
17 record, as far as the briefing schedule, moving that, moving  
18 the hearing date back, we don't have any dates for -- the  
19 motions in limine were set on an order shortening time on the  
20 23rd. Now they're back to the 21st. We don't have any  
21 briefing schedule for oppositions and replies for those.

22 THE COURT: Do you all believe that's something you  
23 could work out, or do you want me to assign dates?

24 MS. BROOKHYSER: I think we can work it out, Your  
25 Honor. It's just when would you -- I know that --

1           THE COURT: I would like to have the reply brief at  
2 least, the reply briefs at least 24 hours before the hearing.  
3 If you can get them a day and a half, that would even be  
4 better for me. All right. But I'll guarantee you that I'll  
5 read them, because I'll read the other stuff in advance. So  
6 at least by -- if the hearing's the 21st --

7           MR. BIGGAR: That's Monday.

8           THE COURT: Yeah. Oh, that's Monday, so maybe by  
9 Friday. That'll give you the whole weekend. So let's say  
10 Friday by 3:00 p.m. Will that work for you guys?

11          MR. PRANGLE: Yes.

12          THE COURT: All right. So Friday, 3:00 p.m., reply  
13 briefs for any and all matters being heard on the 21st. And  
14 the 21st will be any and all matters that were previously set  
15 for the 23rd.

16          MR. KEACH: Thank you, Your Honor.

17          THE COURT: All right. Thank you.

18                 (Proceeding concluded at 10:25 a.m.)  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATION**

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE AUDIO-VISUAL RECORDING OF THE PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

**AFFIRMATION**

I AFFIRM THAT THIS TRANSCRIPT DOES NOT CONTAIN THE SOCIAL SECURITY OR TAX IDENTIFICATION NUMBER OF ANY PERSON OR ENTITY.

**KARR REPORTING, INC.  
Aurora, Colorado**

  
KIMBERLY LAWSON

**CASE NO.**

---

**IN THE  
SUPREME COURT OF NEVADA**

---

**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 XVI of XVII**

---



---

DENNIS L. KENNEDY,

NEV. BAR NO. 1462

JOSEPH A. LIEBMAN,

NEV. BAR NO. 10125

JOSHUA P. GILMORE,

NEV. BAR. NO. 11576

**BAILEY ♦ KENNEDY**

8984 SPANISH RIDGE AVENUE

LAS VEGAS, NEVADA 89148

TELEPHONE: (702) 562-8820

FACSIMILE: (702) 562-8821

DKENNEDY@BAILEYKENNEDY.COM

JLIEBMAN@BAILEYKENNEDY.COM

JGILMORE@BAILEYKENNEDY.COM

MICHAEL E. PRANGLE,

NEV. BAR NO. 8619

KENNETH M. WEBSTER,

NEV. BAR NO. 7205

JOHN F. BEMIS,

NEV. BAR NO. 9509

**HALL PRANGLE & SCHOONVELD,  
LLC**

1160 N. TOWN CENTER DRIVE, STE. 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702.889.6400

FACSIMILE: 702.384.6025

MPRANGLE@HPSLAW.COM

KWEBSTER@HPSLAW.COM

JBEMIS@HPSLAW.COM

*Attorneys for Petitioners*

**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

**VOLUME XVI of XVII**

**TABLE OF CONTENTS**

| <b><u>Tab<br/>No.</u></b> | <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                                                                                                     | <b><u>Page<br/>Nos.:</u></b> |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| 77                        | 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) | PA2994-<br>PA3185            |

## **APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

### **ALPHABETICAL INDEX**

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                      | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Amended Complaint filed August 21, 2009                                                                                                                                                                                                                                                            | I                         | 2                      | PA0007-PA0012            |
| Complaint filed July 23, 2009                                                                                                                                                                                                                                                                      | I                         | 1                      | PA0001-PA0006            |
| Defendant American Nursing Services, Inc.'s Joinder to Plaintiff's Opposition to Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Motion for Reconsideration of this Court's November 4, 2015 Order filed December 4, 2015 | X                         | 27                     | PA1822-PA1824            |
| Defendant Steven Dale Farmer's Limited Opposition to Plaintiff's Motion for Summary Judgment Re: Liability filed October 13, 2014                                                                                                                                                                  | I                         | 5                      | PA0094-PA0098            |
| 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                      | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| 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 NRCP 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |



| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                                  | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                   | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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                   |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                               | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                                                                                                     | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's 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 *77*

# EXHIBIT “29”

# EXHIBIT “29”





**PRIVILEGE LOG  
STEVEN DALE FARMER  
LVMPD CRIMINAL FILE**

| <b>Document ID No.</b> | <b>Description of Document</b>             | <b>Date of Document</b> | <b>Privilege Claimed</b>                                                                                                       |
|------------------------|--------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| <b>LVMPD0002</b>       | <b>Communication Center – Event Search</b> | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0037</b>       | <b>Centennial Hills ED Admit Log</b>       | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0038</b>       | <b>Individual Patient Note</b>             | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0039</b>       | <b>Admission Assessment</b>                | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0040</b>       | <b>Admission Assessment</b>                | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0041</b>       | <b>Admission Assessment</b>                | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |
| <b>LVMPD0042</b>       | <b>Admission Assessment</b>                | <b>05/16/2008</b>       | Relevance/Privacy. This document contains patient identification information and/or patient family identification information. |

DECLARATION OF RESEARCH ASSISTANT, CUSTODIAN OF RECORDS CONCERNING  
LAS VEGAS METROPOLITAN POLICE DEPARTMENT RECORDINGS OF RADIO TRAFFIC  
(TAPE AND COMPUTERIZED MATERIALS)

I, Leslie Loretto, hereby declare under the penalty of perjury:

1. That I am an employee of the Las Vegas Metropolitan Police Department, Las Vegas, Nevada and in such capacity, I act as the Custodian of Records for the records and recordings of 9-1-1 and 3-1-1 calls made to and radio tapes recorded by the Las Vegas Metropolitan Police Department.

2. That all calls made to 9-1-1 are recorded by the Las Vegas Metropolitan Police Department onto DVDs and into computerized records.

3. That I have examined the recordings made by the Las Vegas Metropolitan Police Department and that I have discovered that on May 16, 2008 radio traffic was given in reference to an event at 6900 N Durango Dr at or near 0842 hours.

4. That I have made an exact, true, accurate and complete reproduction of the above described radio traffic onto a CD and have printed an exact, true, accurate, and complete reproduction of the computerized information concerning this call. That I have written the Event Number 080516001021 onto that CD. I then sealed that CD into an envelope, attached this declaration and the computerized information concerning that radio traffic to that envelope and wrote my name and the same Event Number on the outside of that envelope.

5. That the original recording of the radio traffic (DVD and computer entries) by the Las Vegas Metropolitan Police Department was made at the time the call was received by the Las Vegas Metropolitan Police Department and that the recording was made by a person with knowledge in the course of a regularly conducted business activity of the Declarant or of the office of the Declarant.

6. That such recording of the radio traffic transmitted on the Las Vegas Metropolitan Police Department radio channels are a regular practice of the Las Vegas Metropolitan Police Department and are part of the activities of the Las Vegas Metropolitan Police Department and the recording of the radio traffic are matters observed pursuant to a duty imposed by law. That this is a full, true and correct copy of the original on file with the Las Vegas Metropolitan Police Department, except for information that is privileged and confidential by law.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 8, 2013

Signature: *Leslie Loretto*

CUSTODIAN OF RECORDS

**EVENT SEARCH**

THIS DOCUMENT CONTAINS NEITHER RECOMMENDATIONS NOR  
CONCLUSIONS OF THE NATIONAL BUREAU OF STANDARDS  
AND IS NOT INTENDED TO BE USED FOR LEGAL OR OTHER  
PURPOSES. THE UNITED STATES GOVERNMENT IS NOT  
RESPONSIBLE FOR ANY INFORMATION THAT MAY BE  
INACCURATE OR FOR ANY USE OF ANY INFORMATION  
REVEALED HEREIN.

*[Signature]*

**2591 ARCHASSISTANT, Comptroller's Bureau**

|                                |                               |                    |
|--------------------------------|-------------------------------|--------------------|
| EVT : LLV080516001021          | TYPE: 426                     | PRI : 1            |
| LOC : CENTENNIAL HILLS MOS     | BLDG:                         | APT :              |
| ADDR: 6900 N DURANGO DR        | XST : 8801 W DEER SPRINGS WAY | CITY : LV          |
| CADD: ROOM 725--ALT [REDACTED] | CNAM: CAGNINA, SCOTT #3904    | CPHONE: [REDACTED] |
| MAP : 0151545                  | S/B : X5                      | GRA : B2           |
| P/U : 2X43                     | OFF1: 6549                    | OFF2 :             |
| DATE: 08/05/16                 | INIT: 08:42:18                | AREA : I2          |
| 911 : Y                        | CLSE: 00:26:07                | DISP : 0           |

| TIME       | UNIT     | LOCATION                                                                  | STATUS       | REMARKS   | TIME | UNIT    | LOCATION | STATUS | REMARKS |
|------------|----------|---------------------------------------------------------------------------|--------------|-----------|------|---------|----------|--------|---------|
| 08:47:2840 | EU       | IN                                                                        | FRM-         | TO-LV8148 | 33   | LV8148  |          |        |         |
| 08:47:2845 | CM       | 2ND TO PR--VICT PRS WIFE ROXANNE--SUSP IS ON DUTY NURSE FROM LAST NIGHT N |              |           | 33   | LV8148  |          |        |         |
| 08:47:2859 | CM       | O LONGER ON SCENE-WIFE IS IN ROOM 725--PR STANDING BY--EMP'S SUPV ADVD--C |              |           | 33   | LV8148  |          |        |         |
| 08:47:2864 | CM       | ALLED SUSP AND TERMINATED EMP                                             |              |           | 33   | LV8148  |          |        |         |
| 08:47:2870 | CM       | Original Location : CENTENNIAL HILLS HOS                                  |              |           | 33   | LV8148  |          |        |         |
| 08:47:3386 | CM       | SUPS ADVD VIA AM 0847 HRS                                                 |              |           | 33   | LV8148  |          |        |         |
| 08:50:1426 | CM       | 13/368WC TEXT PAGED 0850                                                  |              |           | 13   | LV4807  |          |        |         |
| 09:05:4072 | CM       | 589A ADV'D VIA AM 0905                                                    |              |           | 21   | LV7288  |          |        |         |
| 09:13:0993 | CM       | 33/PR IS P#3904 AND HIS WIFE IS THE VICT--BOTH ARE STANDING BY AT THE RO  |              |           | 33   | LV8148  |          |        |         |
| 09:13:1002 | CM       | CM 0913 HRS                                                               |              |           | 33   | LV8148  |          |        |         |
| 09:14:1498 | US 2X43  | USAS6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:14:1516 | EU 2X43  | FJ FRM-                                                                   | TO-LV/2X43   |           | 21   | LV7288  |          |        |         |
| 09:14:2565 | US 589A  | USAS6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:17:0028 | US 2X43  | USER6900 N DURANGO DR                                                     | 426          |           | 00   | LV6549  |          |        |         |
| 09:17:4525 | US 530   | USAR6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:19:4605 | US 2X43  | USAR6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:20:1879 | CM       | 21/ 669SC ADV'D 0920                                                      |              |           | 21   | LV7288  |          |        |         |
| 09:27:4583 | US 589A  | USER6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:49:2335 | US 589A  | USAR6900 N DURANGO DR                                                     | 426          |           | 21   | LV7288  |          |        |         |
| 09:50:4777 | US 530   | USCL                                                                      | 426          |           | 00   | LV3656  |          |        |         |
| 09:55:4755 | CM       | 2X43 C/4 VIA LL 0955                                                      |              |           | 21   | LV6322  |          |        |         |
| 09:56:1061 | US SC22  | USER6900 N DURANGO DR                                                     | 426          |           | 35   | LV9461  |          |        |         |
| 09:56:1696 | US 6698C | USER6900 N DURANGO DR                                                     | 426          |           | 27   | LV10178 |          |        |         |
| 09:56:2700 | US SC22  | USARCENNTENNIAL HOSP                                                      | 426          |           | 35   | LV9461  |          |        |         |
| 10:14:4011 | US SC22  | USACENNTENNIAL HOSP                                                       | 426          |           | 21   | LV7288  |          |        |         |
| 10:15:3460 | US 6698C | USAR6900 N DURANGO DR                                                     | 426          |           | 35   | LV9461  |          |        |         |
| 11:05:4995 | US 589A  | USCL                                                                      | 426          |           | 00   | LV7460  |          |        |         |
| 11:06:1611 | US 2X43  | USCL                                                                      | 426          |           | 00   | LV6549  |          |        |         |
| 11:06:1616 | CM       | S/A SGT PENCE RESPONDED AND TOOK SCENE                                    |              |           | 00   | LV6549  |          |        |         |
| 11:06:1630 | EU 2X43  | D FRM-                                                                    | TO-Q         |           | 1 00 | LV6549  |          |        |         |
| 14:43:4584 | US SC22  | USACUMC                                                                   | 426          |           | 21   | LV7288  |          |        |         |
| 14:54:0258 | US 6698C | USCL                                                                      | 426          |           | 21   | LV7288  |          |        |         |
| 14:55:2125 | US SC21  | USERUMC                                                                   | 426          |           | 22   | LV6546  |          |        |         |
| 14:56:2160 | US SC21  | USAR1831 LEONARD                                                          | 426          |           | 22   | LV6546  |          |        |         |
| 14:59:5342 | US SC21  | USAR1831 LEONARD                                                          | 426          |           | 22   | LV6546  |          |        |         |
| 14:59:5987 | EU       | FN FRM-                                                                   | TO-NV-169NWX |           | 22   | LV6546  |          |        |         |

LVMPD0002

PA2997

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED  
EXCEPT FOR THE INFORMATION THAT IS PREVIOUSLY  
CLASSIFIED BY THE DEPARTMENT OF JUSTICE  
AND CONFIDENTIAL BY LAW.

\*\*\*\*\*

|                     |                                                                           |                 |      |        |
|---------------------|---------------------------------------------------------------------------|-----------------|------|--------|
| 15:01:1214 CM       | OUT W/ 1 IFO RES 1501                                                     |                 | 22   | LV6546 |
| 15:02:0294 US 3W    | USAS6900 N DURANGO DR                                                     | 426             | 22   | LV6546 |
| 15:02:3342 US 3W    | USER6900 N DURANGO DR                                                     | 426             | 00   | LV6519 |
| 15:05:0403 CM       | SC21 CODE RED NOT ANSWERING / C/ 4 1504                                   | CHAN CLEAR 1504 | 22   | LV6546 |
| 15:07:2556 US 3W    | UR                                                                        | 426             | 22   | LV6546 |
| 15:10:1798 US SC21  | USTO3540 W SAH #388                                                       | 426             | 22   | LV6546 |
| 15:10:2674 CM       | NEG ON SUBJ/ CHECKING 3540 W SAH 1510                                     |                 | 22   | LV6546 |
| 15:10:5288 US SC23  | USER3540 W SAH #388                                                       | 426             | 22   | LV6546 |
| 15:34:5113 US SC22  | USAOISD                                                                   | 426             | 04   | LV9744 |
| 15:34:5500 US SC22  | USCL                                                                      | 426             | 04   | LV9744 |
| 15:34:5545 US SC22  | D FRM-                                                                    | TO-C            | 1 04 | LV9744 |
| 15:57:0273 US SC21  | USAO3540 W SAH #388                                                       | 426             | 35   | LV4803 |
| 15:57:0441 US SC23  | USAR3540 W SAH #388                                                       | 426             | 35   | LV4803 |
| 16:01:3457 US SC23  | USTOOFD                                                                   | 426             | 22   | LV6546 |
| 16:45:0198 US SC21  | USAOOFD                                                                   | 426             | 22   | LV6546 |
| 17:05:3582 BU 2X43  | AR FRM-NW                                                                 | TO-I2           | 21   | LV8148 |
| 19:08:0734 US SC23  | USAOOFD                                                                   | 426             | 35   | LV8617 |
| 19:33:0162 US SC23  | USCL                                                                      | 426             | 35   | LV8617 |
| 19:33:0175 US SC23  | D FRM-                                                                    | TO-K            | 1 35 | LV8617 |
| 20:27:3000 US SC23  | USER6900 N DURANGO DR                                                     | 426             | 35   | LV8617 |
| 20:27:3597 US SC23  | USAROFD                                                                   | 426             | 35   | LV8617 |
| 20:27:5305 US SC21  | USTOLAKE MEAD/DEC                                                         | 426             | 35   | LV8617 |
| 20:28:1437 US SC23  | USTOLAKE MEAD/DEC                                                         | 426             | 35   | LV8617 |
| 20:49:3986 US SC23  | USAOOLAKE MEAD/DEC                                                        | 426             | 22   | LV8204 |
| 20:49:3998 US SC21  | USAOOLAKE MEAD/DEC                                                        | 426             | 22   | LV8204 |
| 20:57:2358 US 669SC | USER6900 N DURANGO DR                                                     | 426             | 05   | LV7874 |
| 21:29:4600 US SC21  | USTOOFD                                                                   | 426             | 22   | LV8204 |
| 22:13:4051 US 669SC | USARISD                                                                   | 426             | 35   | LV2357 |
| 22:35:4810 CM       | 15/PER SC21, REQ'G ID TO 4750 W OAKLEY. . .REQ ID CALL ONCE ENR/PR WILL H |                 | 15   | LV8341 |
| 22:35:4820 CM       | AVE TO OPEN DOORS 2235HRS                                                 |                 | 15   | LV8341 |
| 22:41:3007 CM       | PER SC21, HAS SUSP IN CUST, REQ ID F/ FINGER NAIL SCRAPPINGS, BUCKLE SWA  |                 | 15   | LV8341 |
| 22:41:3015 CM       | B & FINGER SWABS. . .C35 ADV'D VIA AM 2241HRS                             |                 | 15   | LV8341 |
| 22:42:2535 CM       | REQ ID 2241HRS                                                            |                 | 35   | LV2357 |
| 22:43:2360 CM       | SUPES ADV'D 2243HRS                                                       |                 | 35   | LV2357 |
| 22:44:5629 US SC21  | USAO4750 W OAKLEY                                                         | 426             | 35   | LV2357 |
| 22:45:3892 US SC23  | USAO4750 W OAKLEY                                                         | 426             | 35   | LV2357 |
| 22:54:0570 US C27   | USAS6900 N DURANGO DR                                                     | 426             | 35   | LV2357 |
| 22:54:1364 US C27   | USTOISD BLDG                                                              | 426             | 35   | LV2357 |
| 23:09:2728 US C27   | USAOISD BLDG                                                              | 426             | 00   | LV8177 |
| 23:42:0149 US C27   | USCL                                                                      | 426             | 00   | LV8177 |
| 23:46:0110 US SC21  | USTBCCDC                                                                  | 426             | 22   | LV8623 |
| 23:47:3630 US 669SC | USCL                                                                      | 426             | 18   | LV8480 |
| 23:47:4361 US SC23  | USCL                                                                      | 426             | 35   | LV8204 |
| 23:47:4382 US SC23  | D FRM-                                                                    | TO-K            | 1 35 | LV8204 |
| 23:54:5711 US SC21  | USABCCDC                                                                  | 426             | 22   | LV8335 |
| 00:26:0776 US SC21  | USCL                                                                      | 426             | 35   | LV8204 |
| 00:26:0870 US SC21  | D FRM-                                                                    | TO-A            | 1 35 | LV8204 |

\*\*\*\*\*

LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT

DOUGLAS C. GILLESPIE, Sheriff

Partners with the Community

STATE OF NEVADA       )  
                                  ) ss.  
COUNTY OF CLARK       )

May 8, 2013

AFFIDAVIT:

I, SUSANA S. MCCURDY, being duly sworn, on oath, depose and say:

That I am the Records Director of official police records maintained by the Las Vegas Metropolitan Police Department.

That I am in receipt of your Order served to us on May 6, 2013, ordering the entire case file regarding Case Number C245739.

That I have provided a copy of a CD containing photographs pertaining to event number 080516-1021, which was provided to me by the Las Vegas Metropolitan Police Department Photo Laboratory.

That the Las Vegas Metropolitan Police Department has redacted privileged private personal information regarding social security numbers in which a reasonable person would have a legitimate expectation of privacy. Therefore, the Las Vegas Metropolitan Police Department objects to the subpoena on the foregoing grounds pursuant to NRCP 45(c)(2)(B).

That I have provided true and correct copies of all responsive documents under my hand and not privileged by law, except as otherwise indicated above, 188 pages in all.

Susana S. McCurdy

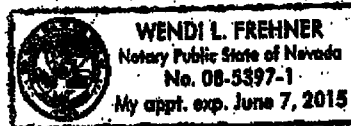
Susana S. McCurdy

DIRECTOR, POLICE RECORDS BUREAU

SUBSCRIBED AND SWORN to before me  
this 8<sup>th</sup> day of May, 2013, in the  
County of Clark, State of Nevada by Susana S. McCurdy

Wendy L. Frehner

NOTARY PUBLIC



Printed by: w8809f  
Printed date/time: 5/7/13 8:49

## Incident Report

Page 1 of 2

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
400 E STEWART  
LAS VEGAS, NEVADA 89101  
(702) 828-3111

**CONFIDENTIAL**

Incident Number: LLV080516001021

### Incident Summary

Incident Type: CRIMINAL INCIDENT  
Inc Occurred Address: 6900 N DURANGO DR CENTENNIAL HILLS HOS LAS VEGAS, NV  
Inc Occurred Start: 05/16/2008 03:00 Inc Occurred End: 05/16/2008 05:00  
Domestic: N Bias Motivation: NO Gang Related: N Substance: U  
Contact Nature: Reported Date/Time: 05/16/2008 09:40  
Reporting Officer: CASPER, M 6549 Primary Assigned Officer: SAUNDERS, M 6076

### Offenses

Statute Code: SEXA200.366A Enhancers:  
Statute Desc: SEXUAL ASSAULT  
Counts: 1 Statute Severity: FELONY

### Persons Involved

Person#: 0001 MNI: 3082374 Can ID Suspect: Yes  
Event Association: VICTIM Contact Date/Time:  
Name: CAGNINA, ROXANNE MARIE

DOB: 07/06/1973 Age: 34 - 34 Sex: FEMALE Race: WHITE/CAUCASIAN  
Height: 5' 3" - 5' 3" Weight: 150 - 160 lbs Eye Color: GREEN Hair Color: RED  
Address: 3717 LOWER SAXON NO. LAS VEGAS, NEVADA 89085 Sector/Beat:  
Phone Type 1: RESIDENCE Phone# 1: (702) 870-5435 Ext 1:  
Phone Type 2: Phone# 2: Ext 2:

Occupation: Employer/School: UNEMPLOYED

Person#: 0002 MNI: 8603647 Can ID Suspect: No  
Event Association: CONTACT Contact Date/Time:  
Name: CAGNINA, SCOTT

DOB: 07/03/1968 Age: 39 - 39 Sex: MALE Race: WHITE/CAUCASIAN  
Height: 6' 1" - 6' 1" Weight: 230 - 230 lbs Eye Color: BLUE Hair Color: BALD / UNKNOWN  
Address: 3717 LOWER SAXON NO. LAS VEGAS, NEVADA 89085 Sector/Beat:  
Phone Type 1: RESIDENCE/HOM Phone# 1: (702) 870-5435 Ext 1:  
Phone Type 2: BUSINESS/WOR Phone# 2: (702) 828-3111 Ext 2:

Occupation: CORRECTIONS OFFICER Employer/School: CCDC

Person#: 0003 MNI: 8603651 Can ID Suspect: No  
Event Association: SUSPECT Contact Date/Time:  
Name: FARMER, STEVEN DALE

DOB: Age: - Sex: MALE Race: WHITE/CAUCASIAN  
Height: Weight: Eye Color: Hair Color:  
Address: Sector/Beat:  
Phone Type 1: Phone# 1: Ext 1:  
Phone Type 2: Phone# 2: Ext 2:

Occupation: NURSE Employer/School:

LVMPD0005

PA3000

Printed by: w8809f  
Printed date/time: 5/7/13 8:49

## Incident Report

**CONFIDENTIAL**

Page 2 of 2

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
400 E STEWART  
LAS VEGAS, NEVADA 89101  
(702) 828-3111

Incident Number: LLV080516001021

### Narratives

ENTERED DATE/TIME: 5/20/2008 09:35:20  
NARRATIVE TYPE: INCIDENT CRIME REPORT  
SUBJECT: SEXUAL ASSAULT  
AUTHOR: CASPER, M 6549

THE VICTIM HAS A HISTORY OF SEIZURES AND THIS MORNING WHILE AT HER RESIDENCE SHE SUFFERED ANOTHER EPISODE. SHE HAS A PANIC ALARM AT HOME WHICH SUMMONS HELP. ROXANNE WAS TRANSPORTED TO CENTENNIAL HILLS HOSPITAL.

ROXANNE SAYS THAT WHILE IN THE ELEVATOR A MALE NURSE BEGAN TO STROKE HER LEG IN AN EFFORT TO COMFORT HER. ONCE THEY ARRIVED IN HER ROOM, ROXANNE SAYS THAT THE NURSE STARTED TO FONDLE HER BREASTS, STROKING HER NECK AND HE THEN USED TWO FINGERS TO PENETRATE HER VAGINA.

ROXANNE WAS HEAVILY MEDICATED DURING THE ASSAULT BUT SAYS THAT THE NURSE KEPT TELLING HER TO RELAX AND HE WAS DOING THESE THINGS TO HER RELAX. ROXANNE FURTHER STATED THAT THE NURSE THEN SAID TO HER AS HE REPEATEDLY PENETRATED HER WITH FINGERS, THAT HE WANTED ROXANNE TO "CUM". ROXANNE ALSO BELIEVES THAT SUSPECT ORALLY ASSAULTED HER AS WELL.

ROXANNE IS NOT SURE HOW LONG THE ASSAULT LASTED BUT SAYS SHE WAS VERY SCARED AND WASN'T SURE WHAT TO DO.

AFTER THE SUSPECT LEFT, SHE CALLED HER HUSBAND, SCOTT AND THEN SAYS SHE CALLED 911. THE SUSPECT RETURNED TO ROXANNE'S ROOM AT 0700, BUT THE NIGHT NURSE WAS IN THE ROOM AT THE TIME. THE SUSPECT AND NIGHT NURSE LEFT THE ROOM TOGETHER.

LVMPD0006

PA3001



**CONFIDENTIAL**

|                                                                                                                                            |                                          |                                                     |                |
|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------|----------------|
| <b>Las Vegas Metropolitan Police Department</b><br><b>Forensic Laboratory</b><br><b>Report of Examination</b><br><b>Biology/DNA Detail</b> |                                          | <b>Distribution Date:</b><br><br><b>JUL 29 2008</b> |                |
| <b>Subject(s):</b>                                                                                                                         | Roxanne Cagnina (v)<br>Steven Farmer (s) | <b>Case:</b>                                        | 08 0516-1021   |
|                                                                                                                                            |                                          | <b>Agency:</b>                                      | LVMPD          |
|                                                                                                                                            |                                          | <b>Incident:</b>                                    | Sexual Assault |
|                                                                                                                                            |                                          | <b>Requester:</b>                                   | M. Pence       |

The Biology/DNA Detail of the Las Vegas Metropolitan Police Department Forensic Laboratory examined evidence in this case and reports the following results:

| Pkg #      | Item # | Lab # | Description                            | Results                     |
|------------|--------|-------|----------------------------------------|-----------------------------|
| SAK-Ebbert |        | KP1   | Sexual Assault Kit - Roxanne Cagnina   |                             |
|            |        | KP1A  | Reference buccal swabs                 | • Full female profile       |
|            |        | KP1B1 | Vaginal swabs                          | • Full female profile       |
|            |        | KP1B2 | Cervical swabs                         | • Full female profile       |
|            |        | KP1C1 | Face swab                              | • Full female profile       |
|            |        | KP1C2 | Fingernail scrapings                   | • Partial DNA profile       |
|            |        | KP1D  | Pubic hair brushing                    | • Not examined              |
|            |        | KP1E  | Rectal swabs                           | • Full female profile       |
|            |        | KP1F1 | Oral swabs                             | • Full female profile       |
|            |        | KP1F2 | Floss                                  | • DNA typing not performed  |
|            |        | KP1G  | Labial swabs                           | • Full female profile       |
|            |        | KP1H  | Paperwork                              | • Used for information only |
|            |        | KP1I1 | Breast swabs                           | • Mixture profile           |
|            |        | KP1I2 | Thigh swabs                            | • Mixture profile           |
| 8177-1     | 1      | KP2A  | Right hand finger swabs                | • Full male profile         |
|            | 2      | KP2B  | Left hand finger swabs                 | • Full male profile         |
|            | 3      | KP2C  | Right hand fingernail scrapings        | • Possible mixture profile  |
|            | 4      | KP2D  | Left hand fingernail scrapings         | • Full male profile         |
| 8177-2     | 5      | KP3   | Reference buccal swabs - Steven Farmer | • Full male profile         |

#### CONCLUSIONS

Items KP1A, KP1B1, KP1B2, KP1C1, KP1C2, KP1E, KP1F1, KP1G, KP1I1, KP1I2, KP2A, KP2B, KP2C, KP2D, and KP3 were subjected to PCR amplification at the following STR genetic loci: D8S1179, D21S11, D7S820, CSF1PO, D3S1358, TH01, D13S317, D16S539, D2S1338, D19S433, vWA, TPOX, D18S51, D5S818, and FGA. The sex-determining Amelogenin locus was also examined.

The DNA profiles obtained from the vaginal swabs (KP1B1), cervical swabs (KP1B2), face swabs (KP1C1), rectal swabs (KP1E), oral swabs (KP1F1), and labial swabs (KP1G) are consistent with Roxanne Cagnina (KP1A). Additional alleles below threshold were detected on the face swabs (KP1C1).

Due to limited information, conclusions with regard to the source of the partial DNA profile obtained from the fingernail scrapings (KP1C2) cannot be reached.

**CONFIDENTIAL**

The DNA profile obtained from the breast swabs (KP111) is a mixture. The major profile is consistent with Roxanna Cagnina (KP1A). Steven Farmer (KP3) cannot be excluded as a minor DNA contributor. Greater than 99.99% of individuals in the population are excluded as possible contributors of DNA to the breast swabs (KP111).

The DNA profile obtained from the thigh swabs (KP112) is a mixture. The major profile is consistent with Roxanna Cagnina (KP1A). Steven Farmer (KP3) cannot be excluded as a minor DNA contributor. Greater than 99.88% of individuals in the population are excluded as possible contributors of DNA to the thigh swabs (KP112).

The DNA profiles obtained from the finger swabs (KP2A and KP2B) and the left hand fingernail scrapings (KP2D) are consistent with Steven Farmer (KP3). Possible additional alleles below threshold were detected on these samples.

The DNA profile obtained from the right hand fingernail scrapings (KP2C) is a possible mixture. The major profile is consistent with Steven Farmer (KP3). Due to limited information, conclusions with regard to possible minor contributors cannot be reached.

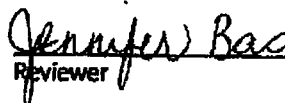
I returned the evidence to the vault.

I declare under penalty of perjury that the foregoing is true and correct.



Kristina Paulette, P#8805  
Forensic Scientist II

July 16, 2008  
Date

  
Reviewer

CONFIDENTIAL

|                                                                                                                                            |                                  |                                              |                   |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------|-------------------|
| <b>Las Vegas Metropolitan Police Department</b><br><b>Forensic Laboratory</b><br><b>Report of Examination</b><br><b>Biology/DNA Detail</b> |                                  | <b>Distribution Date:</b><br><br>DEC 19 2011 |                   |
| <b>Subject(s):</b>                                                                                                                         | <b>FARMER, Steven (suspect)</b>  | <b>Case:</b>                                 | 08 0516-1021      |
|                                                                                                                                            | <b>CAGNINA, Roxanne (victim)</b> | <b>Agency:</b>                               | LVMPD             |
|                                                                                                                                            |                                  | <b>Incident:</b>                             | Sexual Assault    |
|                                                                                                                                            |                                  | <b>Requester:</b>                            | J. Merback - CCDA |

The Biology/DNA Detail of the Las Vegas Metropolitan Police Department Forensic Laboratory examined evidence in this case and reports the following results:

| Impound Pkg# | Impound Item# | Lab Pkg # | Description                                          | Results                            |
|--------------|---------------|-----------|------------------------------------------------------|------------------------------------|
| SAK-Ebbert   |               | JM-1      | Sexual Assault Kit - Roxanne Cagnina                 |                                    |
|              |               |           | A) Buccal swabs                                      | • Full female profile              |
|              |               |           | B) Vaginal and cervical swabs                        | • Not examined                     |
|              |               |           | C) Debris/fingernail scrapings/bite marks/secretions | • Not examined                     |
|              |               |           | D) Pubic hair brushing                               | • Not examined                     |
|              |               |           | E) Rectal swabs                                      | • Not examined                     |
|              |               |           | F) Oral swabs/floss                                  | • Not examined                     |
|              |               |           | G) Labial swabs                                      | • Not examined                     |
|              |               |           | H) Paperwork                                         | • Used for information only        |
|              |               |           | I) 1) Breast swabs.                                  | • Partial possible mixture profile |
| 8177-2       | 5             | JM-2      | 2) Thigh swabs                                       | • Possible mixture profile         |
|              |               |           | Buccal swabs - Steven Farmer                         | Full male profile                  |

#### CONCLUSIONS

Items JM-1A, JM-1I1, JM-1I2, and JM-2 were subjected to PCR amplification at the following STR genetic loci: D8S1179, D21S11, D7S820, CSF1PO, D3S1358, TH01, D13S317, D16S539, D2S1338, D19S433, vWA, TPOX, D18S51, D5S818, and FGA. The sex-determining Amelogenin locus was also examined.

The full and partial DNA profiles obtained from the breast (JM-1I1) and thigh (JM-1I2) swabs are consistent with Roxanne Cagnina (JM-1A). There are indications of a mixture in these samples, including a male contributor below the interpretation threshold; however, sufficient data was not obtained for further comparison.

The evidence was returned to the vault.

Julie M. Marschner  
Julie M. Marschner, P#8806 December 14, 2011  
Forensic Scientist II

Beata Uda #14279  
Administrative Reviewer

Wendy H. Gauthier #8291  
Technical Reviewer

**CONFIDENTIAL**

Page 1 of 1

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT**

Event # 082516-1021

|                                                           |  |                                 |                                                                             |
|-----------------------------------------------------------|--|---------------------------------|-----------------------------------------------------------------------------|
| Specific Crime <u>SLA</u>                                 |  | Date Documented <u>05-16-08</u> | Time Occurred <u>0300-0500</u>                                              |
| Location of Occurrence <u>1900 N. DURANGO LV NV 89131</u> |  | Sector/Beat <u>X5</u>           | <input type="checkbox"/> City<br><input checked="" type="checkbox"/> County |

|                                                                                                   |                 |                                                     |                            |
|---------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------|----------------------------|
| Your Name (Last / First / Middle) <u>CAGNINA, SCOTT MATTHEW</u>                                   |                 | Date of Birth <u>7-3-68</u>                         |                            |
| Race <u>W</u>                                                                                     | Sex <u>M</u>    | Height <u>6'1"</u>                                  | Weight <u>230</u>          |
| Hair <u>BRN</u>                                                                                   | Eyes <u>BLU</u> | Work Schol. (Hours) <u>0600-1800</u>                | (Days Off) <u>MTW</u>      |
| Residence Address: (Number & Street) <u>3717 LOWER SARON AVE</u>                                  |                 | Bldg./Apt. # <u>NLV</u>                             | City <u>NV</u>             |
| State <u>NV</u>                                                                                   |                 | Zip Code <u>89085</u>                               | Res. Phone <u>870-5435</u> |
| Bus. (Local) Address: (Number & Street) <u>370 SO. CASINO CONTR BLVD</u>                          |                 | Bldg./Apt. # <u>NLV</u>                             | City <u>NV</u>             |
| State <u>NV</u>                                                                                   |                 | Zip Code <u>89101</u>                               | Bus. Phone <u>671-3736</u> |
| Best place to contact you during the day <u>CELL PHONE 807-5458</u>                               |                 | Best time to contact you during the day <u>6/02</u> |                            |
| Can You Identify the Suspect? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |                 |                                                     |                            |

DETAILS ON 5/16/08 AT APPROXIMATELY 0640 HOURS MY WIFE, ROXANNE CAGNINA, CALLED ME AT HOME AND ASKED ME TO COME TO THE HOSPITAL. I TOLD HER I WAS GETTING THE KIDS READY FOR SCHOOL AND THAT I WOULD COME AS SOON AS POSSIBLE. SHE TOLD ME A MALE NURSE FROM THE EMERGENCY ROOM HAD TOUCHED HER INAPPROPRIATELY AND THAT HE HAD SAID HE WOULD COME BACK AND SEE HER AT SEVEN IN THE MORNING. I TOLD HER TO CONTACT HIS NURSE AND LET THEM KNOW WHAT HAPPENED AND THAT I WOULD BE THERE AS SOON AS I COULD. UPON ARRIVING I FOUND HER LORI WHEN A SUPERVISOR IN ROXANNE'S ROOM INTERVIEWING HER. ROXANNE STATED THAT THE SUSPECT DID COME IN HER ROOM AT ABOUT SEVEN 0700 HOWEVER THE NIGHT NURSE WAS IN THE ROOM WHEN HE CAME IN AND THE NURSES THEN LEFT TOGETHER.

I HAVE READ THIS STATEMENT AND I AFFIRM TO THE TRUTH AND ACCURACY OF THE FACTS CONTAINED HEREIN. THIS STATEMENT WAS COMPLETED AT (LOCATION) CENTENIAL HILLS HOSPITAL ROOM 785

THE 16TH DAY OF MAY AT 2:00 PM (AM/PM) 2008

Witness/Officer:

(SIGNATURE)

LVMPD0010

PA3005

**CONFIDENTIAL**

Check here if property listing is continued on continuation page.

TSS: Temp Schedule Report

Page 2 of 24

|              |                                                                                                                             |        |                                |       |       |                        |              |
|--------------|-----------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------|-------|-------|------------------------|--------------|
| 11/27/05 Sun | Valley View Skilled Nursing Center<br>1162 South Dara Street<br>Las Vegas, NV 89101<br>P 707-452-1436 F 707-463-1247        | FILLED | 8:30A - 3P 8.5 (1) (Per Diem)  | 8.00  | 8.00  | CNA - SNF              | C Kacott     |
| 12/03/05 Sat | Friends House<br>584 Benicia Drive<br>Santa Rosa, CA 95409<br>P 707-573-4517 F 707-573-4555                                 | FILLED | 7A - 3P 8 (1) (Per Diem)       | 7.50  | 8.00  | CNA - SNF              | C ddischare  |
| 12/05/05 Mon | Headlands District Hospital<br>1375 University Ave.<br>Headlandsburg, CA 95448<br>P 707-431-6377 or 431-6320 F 707-431-6579 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - MedSurg          | C Kacott     |
| 12/07/05 Wed | Headlands District Hospital<br>1375 University Ave.<br>Headlandsburg, CA 95448<br>P 707-431-6377 or 431-6320 F 707-431-6579 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 4.50  | CNA - MedSurg          | C Kacott     |
| 12/27/05 Tue | Friends House<br>584 Benicia Drive<br>Santa Rosa, CA 95409<br>P 707-573-4517 F 707-573-4555                                 | FILLED | 7A - 3P 3 (1) (Per Diem)       | 7.50  | 7.00  | CNA - SNF              | C ansys      |
| 06/29/07 Fri | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 8:30P - 10P 4.5 (2) (Per Diem) | 4.50  | 4.50  | CNA - Clinic - Kennath | C bonniapyle |
| 07/20/07 Fri | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 12P - 8P 8 (2) (Per Diem)      | 8.00  | 5.00  | CNA - Clinic           | C bonniapyle |
| 07/21/07 Sat | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic           | C lambart    |
| 07/23/07 Mon | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic           | C lambart    |
| 07/24/07 Tue | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan   | C lambart    |
| 07/29/07 Sun | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P 702-383-9574 F 702-383-9574            | FILLED | 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan   | C bonniapyle |

http://web5.securits.com/ans/reports/r\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0012

PA3007

TSS: Temp Schedule Report

Page 3 of 24

|              |                                                                                                                                                                   |                                       |       |       |                           |              |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------|-------|---------------------------|--------------|
| 07/30/07 Mon | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                 | FILLED 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan      | C bonniepyle |
| 07/31/07 Tue | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive | FILLED 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan      | C bonniepyle |
| 08/03/07 Fri | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive | FILLED 7:30A - 3:30P & (1) (Per Diem) | 7.50  | 7.50  | CNA - Orientation NonBill | C bonniepyle |
| 08/04/07 Sat | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                 | FILLED 7A - 7P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel     | C bonniepyle |
| 08/05/07 Sun | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                 | FILLED 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan      | C bonniepyle |
| 08/06/07 Mon | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                 | FILLED 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan      | C bonniepyle |
| 08/07/07 Tue | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                 | FILLED 8A - 8P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Dylan      | C bonniepyle |
| 08/08/07 Wed | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital                                 | FILLED 7A - 7P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel     | C bonniepyle |
| 08/11/07 Sat | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive | FILLED 7A - 7P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel     | C bonniepyle |
| 08/12/07 Sun | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive | FILLED 3P - 11:30P & 5 (2) (Per Diem) | 8.00  | 16.00 | CNA - Psych - 3B Unit     | C lambert    |
| 08/13/07 Mon | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive | FILLED 3P - 11:30P & 5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 3B Unit     | C lambert    |

[http://web5.securetas.com/ans/reports/r\\_tempschedule.cfm](http://web5.securetas.com/ans/reports/r_tempschedule.cfm)

CONFIDENTIAL

5/19/2008

LVMPD0013

PA3008



## TSS: Temp Schedule Report

Page 4 of 24

|              |                                                                                                                                                      |        |                                |       |       |                        |              |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------|-------|-------|------------------------|--------------|
| 08/14/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 3B Unit  | C Bonnielyle |
| 08/15/07 Wed | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 3B Unit  | C Bonnielyle |
| 08/16/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Department of Family Services-Childhaven                 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 3B Unit  | C Bonnielyle |
| 08/17/07 Fri | Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital                                    | FILLED | 7A - 6P 11 (1) (Per Diem)      | 11.00 | 11.00 | CNA - Clinic - Liberal | C Bonnielyle |
| 08/19/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - H Pod 4B | C Bonnielyle |
| 08/19/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem) | 8.00  | 7.50  | CNA - Psych - 1B Unit  | C Bonnielyle |
| 08/21/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 3B Unit  | C Bonnielyle |
| 08/21/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 1A 2 (3) (Per Diem)      | 1.50  | 1.50  | CNA - Psych - 1A Unit  | C Bonnielyle |

|              |                                                                                                                                                      |        |                                |       |       |                        |              |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------|-------|-------|------------------------|--------------|
| 08/22/07 Thu | Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital                                    |        |                                |       |       | CNA - Clinic - Liberal | C Bonnielyle |
| 08/23/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Department of Family Services-Childhaven                 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - 1B Unit  | C Bonnielyle |
| 08/25/07 Sat | Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital                                    | FILLED | 7A - 7P 12 (1) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Liberal | C Bonnielyle |
| 08/26/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem) | 8.00  | 8.00  | CNA - Psych - POU Unit | C Bonnielyle |

http://web5.securetas.com/ans/reports/r\_tempschedule.cfm

LVMPD0014

CONFIDENTIAL

5/19/2008

## TSS: Temp Schedule Report

Page 5 of 24

|              |                                                                                                                                                                                      |        |                                 |      |      |                        |              |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|------|------|------------------------|--------------|
| 08/26/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - POU Unit | C bonniepyle |
| 08/27/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C bonniepyle |
| 08/28/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3B Unit  | C bonniepyle |
| 08/29/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C Lambert    |
| 08/30/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C bonniepyle |
| 08/30/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - H Pod 4B | C bonniepyle |
| 08/31/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C bonniepyle |
|              |                                                                                                                                                                                      |        |                                 | 5.00 | 5.00 | CNA - Psych - H Pod 4B | C bonniepyle |
| 09/01/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - POU Unit | C bonniepyle |
| 09/02/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C bonniepyle |
| 09/04/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - H Pod 4A | C bonniepyle |
| 09/04/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit  | C bonniepyle |

http://web5.secureus.com/ans/reports/r\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0015

PA3010

## TSS: Temp Schedule Report

Page 6 of 24

|              |                                                                                                                                                                                       |                                        |      |      |                       |                |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|-----------------------|----------------|
| 09/05/07 Wed | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit | C bonniepyllie |
| 09/05/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/06/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/07/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 9.00 | 9.00 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/07/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/08/07 Sat | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11P 8 (2) (Per Diem)       | 7.50 | 8.00 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/09/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11P 8 (2) (Per Diem)       | 7.50 | 8.00 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/10/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/11/07 Tue | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit | C bonniepyllie |
| 09/12/07 Wed | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit | C llambert     |

CONFIDENTIAL

5/19/2008

http://web5.securets.com/ans/reports/r\_tempschedule.cfm

LVMPD0016

PA3011

## TSS: Temp Schedule Report

Page 7 of 24

|              |                                                                                                                                                                                      |        |                                 |       |       |                        |              |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|-------|-------|------------------------|--------------|
| 09/12/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 7.50  | CNA - Psych - 1A Unit  | C Lambert    |
| 09/13/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 6.5 (2) (Per Diem)  | 8.00  | 9.00  | CNA - Psych - 1A Unit  | C Lambert    |
| 09/14/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 1P - 11:30P 10.5 (2) (Per Diem) | 10.00 | 10.00 | CNA - Psych - 1B Unit  | C Bonniapple |
| 09/15/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1B Unit  | C Bonniapple |
| 09/16/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1B Unit  | C Lambert    |
| 09/16/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 7.50  | CNA - Psych - 1B Unit  | C Bonniapple |
| 09/17/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2A Unit  | C Bonniapple |
| 09/17/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 1B Unit  | C Bonniapple |
| 09/18/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1B Unit  | C Bonniapple |
| 09/18/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - M Pod 4A | C Bonniapple |
| 09/19/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1A Unit  | C Bonniapple |
| 09/19/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 2A Unit  | C Bonniapple |

CONFIDENTIAL

[http://web5.securetsa.com/ans/reports/r\\_tempschedule.cfm](http://web5.securetsa.com/ans/reports/r_tempschedule.cfm)

5/19/2008

LVMPD0017

PA3012

## TSS: Temp Schedule Report

Page 8 of 24

|              |                                                                                                                                                                                                             |        |                                 |      |      |                        |               |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|------|------|------------------------|---------------|
| 09/20/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C bonnlestyle |
| 09/21/07 Fri | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 7A - 3P 8 (1) (Per Diem)        | 7.50 | 8.00 | CNA - Psych - 1B Unit  | C bonnlestyle |
| 09/21/07 Fri | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit  | C bonnlestyle |
| 09/22/07 Sat | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 7A - 3:30P 8.5 (1) (Per Diem)   | 8.00 | 8.00 | CNA - Psych - 2A Unit  | C bonnlestyle |
| 09/22/07 Sat | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4B | C bonnlestyle |
| 09/23/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 7A - 3:30P 8.5 (1) (Per Diem)   | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C bonnlestyle |
| 09/23/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - G Pod 3B | C bonnlestyle |
| 09/24/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C bonnlestyle |
| 09/24/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 3B Unit  | C bonnlestyle |
| 09/25/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C bonnlestyle |
| 09/26/07 Wed | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - H Pod 4B | C bonnlestyle |
| 09/26/07 Wed | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 2A Unit  | C bonnlestyle |
| 09/27/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2B Unit  | C bonnlestyle |

CONFIDENTIAL

http://web5.secureitss.com/iss/reports/r\_tempsschedule.cfm

5/19/2008

LVMPD0018

PA3013

ISS: Temp Schedule Report

Page 9 of 24

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                        |       |                             |              |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-------|-----------------------------|--------------|
| 09/27/07 Thu | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                      | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | CNA - Psych - 2B Unit       | C bonniepyle |
| 09/28/07 Fri | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | CNA - Psych - 2A Unit       | C bonniepyle |
| 09/28/07 Fri | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | CNA - Psych - 3B Unit       | C bonniepyle |
| 09/29/07 Sat | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | CNA - Psych - 2B Unit       | C bonniepyle |
| 09/29/07 Sat | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | CNA - Psych - 2B Unit       | C bonniepyle |
| 09/30/07 Sun | <p>                     Department of Family Services-ChildHaven<br/>                     701 N. Pecos<br/>                     Las Vegas, NV 89101<br/>                     P (702)455-5367 F 702-383-9574<br/>                     Department of Family Services-ChildHaven<br/>                     701 N. Pecos<br/>                     Las Vegas, NV 89101<br/>                     P (702)455-5367 F 702-383-9574<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p> | FILLED 7P - 7A 12 (2) (Per Diem)       | 12.00 | CNA - Clinic - Juan- achul  | C bonniepyle |
| 10/01/07 Mon | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 10:30P - 6:30A 8 (2) (Per Diem) | 8.00  | CNA - Clinic - Chad-Alschul | C bonniepyle |
| 10/01/07 Mon | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 8A - 4:30P 8.5 (1) (Per Diem)   | 8.00  | CNA - Orientation NonBill   | C bonniepyle |
| 10/02/07 Tue | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | CNA - Psych - 1B Unit       | C bonniepyle |
| 10/02/07 Tue | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | CNA - Psych - 2A Unit       | C bonniepyle |
| 10/03/07 Wed | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | CNA - Psych - H Pod 4B      | C bonniepyle |
| 10/03/07 Wed | <p>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146<br/>                     P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br/>                     Southern Nevada Adult Mental Health-Rawson Neal Hospital<br/>                     Las Vegas, NV 89146                 </p>                                                                                                                                                                                                                                                                                                                                | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | CNA - Psych - H Pod 4B      | C bonniepyle |

CONFIDENTIAL

http://web5.securets.com/ans/reports/r\_tempschedule.cfm

5/19/2008

LVMPD0019

PA3014

## TSS: Temp Schedule Report

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                        |      |      |                        |              |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|------------------------|--------------|
| 10/04/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - H Pod 4B | C bonniepyle |
| 10/04/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - H Pod 4B | C bonniepyle |
| 10/05/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2B Unit  | C bonniepyle |
| 10/05/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 1B Unit  | C bonniepyle |
| 10/06/07 Sat | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit  | C bonniepyle |
| 10/06/07 Sat | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - H Pod 4B | C bonniepyle |
| 10/07/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2B Unit  | C bonniepyle |
| 10/07/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - H Pod 4B | C bonniepyle |
| 10/11/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C llambart   |
| 10/11/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit  | C bonniepyle |
| 10/12/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C bonniepyle |
| 10/12/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                                                         | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4A | C bonniepyle |

CONFIDENTIAL

5/19/2008

http://web5.secureis.com/ans/reports/r\_tempschedule.cfm

LVMPD0020

PA3015



## TSS: Temp Schedule Report

Page 11 of 24

|              |                                                                                                                                                                                       |                                        |      |      |                        |              |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|------------------------|--------------|
| 10/13/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C Lambert    |
| 10/13/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit  | C Spence     |
| 10/14/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2A Unit  | C Lambert    |
| 10/14/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 2A Unit  | C Lambert    |
| 10/15/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2A Unit  | C Lambert    |
| 10/15/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2A Unit  | C Lambert    |
| 10/17/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit  | C Bonniapala |
| 10/17/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit | C Bonniapala |
| 10/18/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2B Unit  | C Bonniapala |
| 10/19/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C Bonniapala |
| 10/19/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit | C Bonniapala |
| 10/21/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3B Unit  | C Lambert    |

http://web5.securebs.com/ans/reports/r\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0021

PA3016

## TSS: Temp Schedule Report

Page 12 of 24

|              |                                                                                                                                                                                                             |                                        |      |      |                        |             |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|------------------------|-------------|
| 10/21/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4B | C Lambert   |
| 10/22/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - H Pod 4B | C Lambert   |
| 10/23/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3B Unit  | C Bonnielye |
| 10/24/07 Wed | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 3B Unit  | C Lambert   |
| 10/25/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C Lambert   |
| 10/26/07 Fri | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 3A Unit  | C Lambert   |
| 10/27/07 Sat | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C Lambert   |
| 10/28/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 3A Unit  | C Bonnielye |
| 10/29/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C Bonnielye |
| 10/30/07 Tue | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit | C Bonnielye |
| 10/31/07 Wed | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C Bonnielye |

http://web5.secureitss.com/ans/reports/t\_tempschedule.cfm

5/19/2008

CONFIDENTIAL

LVMPD0022

PA3017

## TSS: Temp Schedule Report

Page 13 of 24

|              |                                                                                                                                                                                      |        |                                 |       |       |                               |               |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|-------|-------|-------------------------------|---------------|
| 10/30/07 Tue | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 2A Unit         | C bonnleapyle |
| 11/01/07 Thu | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 3A Unit         | C bonnleapyle |
| 11/01/07 Thu | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 3B Unit         | C bonnleapyle |
| 11/02/07 Fri | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - West Charleston | C bonnleapyle |
| 11/02/07 Fri | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - POU Unit        | C bonnleapyle |
| 11/03/07 Sat | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 7P - 11A 17 (5) (Per Diem)      | 17.00 | 17.00 | CNA - Clinic - Lionel-Agass   | C bonnleapyle |
| 11/04/07 Sun | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2A Unit         | C bonnleapyle |
| 11/11/07 Sun | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2B Unit         | C bonnleapyle |
| 11/12/07 Mon | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 2B Unit         | C bonnleapyle |
| 11/12/07 Mon | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2B Unit         | C bonnleapyle |
| 11/14/07 Wed | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 7.50  | CNA - Psych                   | C malimmons   |
|              | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676                                                                                                                    | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - H Pod 4A        | C bonnleapyle |

CONFIDENTIAL

http://web5.securecss.com/ans/reports/r\_tempschedule.cfm

5/19/2008

LVMPD0023

PA3018

TSS: Temp Schedule Report

Page 14 of 24

|              |                                                                                                                                                      |        |                                 |       |       |                               |              |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|-------|-------|-------------------------------|--------------|
| 11/15/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 7:30A - 3P 7.5 (1) (Per Diem)   | 7.00  | 7.00  | CNA - Psych - 2A Unit         | C bonnlepyla |
| 11/15/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2B Unit         | C bonnlepyla |
| 11/16/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 7:30A - 3:30P 8 (1) (Per Diem)  | 7.50  | 7.50  | CNA - Psych - M Pod 4A        | C bonnlepyla |
| 11/16/07 Fri | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2B Unit         | C bonnlepyla |
| 11/17/07 Sat | Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5267 F 702-383-9574                                    | FILLED | 7P - 7A 12 (5) (Per Diem)       | 12.00 | 12.00 | CNA - Clinic - Ellis          | C bonnlepyla |
| 11/18/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 2B Unit         | C bonnlepyla |
| 11/21/07 Wed | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 3P - 11:30P 8.5 (3) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1B Unit         | C bonnlepyla |
| 11/22/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - 2A Unit         | C bonnlepyla |
| 11/22/07 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych - 1B Unit         | C bonnlepyla |
| 11/25/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50  | 7.50  | CNA - Psych - West Charleston | C bonnlepyla |
| 11/25/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00  | 8.00  | CNA - Psych                   | C masimons   |
| 11/25/07 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00  | 7.50  | CNA - Psych - K Pod 4A        | C bonnlepyla |

CONFIDENTIAL

5/19/2008

http://web5.securells.com/ans/reports/r\_tempschedule.cfm

LVMPD0024

PA3019

## TSS: Temp Schedule Report

|              |                                                                                                                                                                                       |                                        |      |      |                               |              |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|-------------------------------|--------------|
| 11/26/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - H Pod 4A        | C bonniapyle |
| 11/26/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4A        | C bonniapyle |
| 11/28/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4B        | C bonniapyle |
| 12/03/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit         | C bonniapyle |
| 12/04/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit         | C bonniapyle |
| 12/05/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (3) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit         | C bonniapyle |
| 12/05/07 Wed | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - West Charleston | C bonniapyle |
| 12/09/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit         | C bonniapyle |
| 12/09/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 3A Unit         | C bonniapyle |
| 12/10/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2B Unit         | C bonniapyle |
| 12/13/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit         | C bonniapyle |
| 12/13/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702) 486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit        | C bonniapyle |

[http://web5.secureus.com/ans/reports/r\\_tempschedule.cfm](http://web5.secureus.com/ans/reports/r_tempschedule.cfm)

LVMPD0025

PA3020

CONFIDENTIAL

5/19/2008

## TSS: Temp Schedule Report

Page 16 of 24

|              |                                                                                                                                                      |        |                                 |      |      |                        |              |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|------|------|------------------------|--------------|
| 12/14/07 Fri | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3B Unit  | C bonniepyle |
| 12/14/07 Fri | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit | C bonniepyle |
| 12/15/07 Sat | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C bonniepyle |
| 12/15/07 Sat | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - POU Unit | C chough     |
| 12/16/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2A Unit  | C lambert    |
| 12/16/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - H Pod 4B | C diltcharo  |
| 12/17/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C bonniepyle |
| 12/17/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 3B Unit  | C bonniepyle |
| 12/20/07 Thu | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit  | C lambert    |
| 12/23/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C bonniepyle |
| 12/23/07 Sun | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - H Pod 4B | C bonniepyle |
| 12/24/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit | C bonniepyle |
| 12/24/07 Mon | Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital | FILLED | 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit  | C bonniepyle |

http://web5.securitss.com/ans/reports/r\_rempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0026

PA3021

## TSS: Temp Schedule Report

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                        |      |      |                               |              |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|-------------------------------|--------------|
| 12/23/07 Tue | P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/25/07 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/27/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/27/07 Thu | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/28/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/28/07 Fri | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1B Unit         | C bonnlepyla |
| 12/29/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 1A Unit         | C bonnlepyla |
| 12/29/07 Sat | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit        | C bonnlepyla |
| 12/30/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C bonnlepyla |
| 12/30/07 Sun | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 11P - 7:30A 8.5 (3) (Per Diem)  | 8.00 | 7.50 | CNA - Psych - POU Unit        | C bonnlepyla |
| 12/31/07 Mon | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 2A Unit         | C bonnlepyla |
| 01/01/08 Tue | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676<br>Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>Las Vegas, NV 89146                                                                                                                                                                                                                                                          | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - West Charleston | C bonnlepyla |

5/19/2008

CONFIDENTIAL

http://web5.secureitss.com/ans/reports/r\_tempschedule.cfm

LVMPD0027

PA3022

## TSS: Temp Schedule Report

|              |                                                                                                                                                                                      |                                        |      |      |                               |              |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|------|-------------------------------|--------------|
| 01/01/08 Tue | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 3A Unit         | C bonnlapyle |
| 01/02/08 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - 3A Unit         | C bonnlapyle |
| 01/03/08 Thu | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - West Charleston | C bonnlapyle |
| 01/06/08 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/06/08 Sun | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/07/08 Mon | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/07/08 Mon | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/08/08 Tue | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/08/08 Tue | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/09/08 Wed | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C bonnlapyle |
| 01/09/08 Wed | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 11:30P - 7:30A 8 (3) (Per Diem) | 7.50 | 7.50 | CNA - Psych - 1A Unit         | C bonnlapyle |
| 01/22/08 Tue | Southern Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 staff 486-0676 | FILLED 3P - 11:30P 8.5 (2) (Per Diem)  | 8.00 | 8.00 | CNA - Psych - POU Unit        | C mainmons   |

http://web5.securetsa.com/ans/reports/r\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0028

PA3023



## TSS: Temp Schedule Report

Page 19 of 24

|                           |                                                                                                                                                                                                                                                                                         |                                       |       |       |                              |              |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------|-------|------------------------------|--------------|
| ISS: Temp Schedule Report |                                                                                                                                                                                                                                                                                         |                                       |       |       |                              |              |
| 01/23/08 Wed              | 1650 Community College Drive<br>Las Vegas, NV 89146<br>P (702)486-4400 (CELL) 702-917-9105 F 702-486-0045 ext 486-0676<br>Department of Family Services-ChildHaven<br>701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven | FILLED 3P - 7P 4 (2) (Per Diem)       | 3.50  | 4.00  | CNA - LantCental MS          | C mstimmans  |
| 01/26/08 Sat              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 7P - 7A 12 (5) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 01/27/08 Sun              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 7P - 7A 12 (5) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 01/28/08 Mon              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 1P - 10P 9 (2) (Per Diem)      | 9.00  | 9.00  | CNA - Clinic - Chad          | C bonniepyle |
| 01/31/08 Thu              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 10P - 7:30A 9.5 (5) (Per Diem) | 9.50  | 9.50  | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/01/08 Fri              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 10P - 7A 9 (5) (Per Diem)      | 9.00  | 9.00  | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/02/08 Sat              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 7P - 7A 12 (5) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/05/08 Tue              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 1:30P - 10P 8.5 (2) (Per Diem) | 8.50  | 8.50  | CNA - Clinic - Chad-Alacui   | C bonniepyle |
| 02/07/08 Thu              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 10P - 7A 9 (5) (Per Diem)      | 9.00  | 9.00  | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/08/08 Fri              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 10P - 7:30A 9.5 (5) (Per Diem) | 9.50  | 9.50  | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/09/08 Sat              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 7P - 7A 12 (5) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 02/15/08 Fri              | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 F 702-383-9574<br>Department of Family Services-ChildHaven                                                                                                                                                                       | FILLED 10P - 7A 9 (5) (Per Diem)      | 9.00  | 9.00  | CNA - Clinic - Lionel-Agassi | C mstimmans  |

[http://web5.securelss.com/ans/reports/r\\_tempschedule.cfm](http://web5.securelss.com/ans/reports/r_tempschedule.cfm)

LVMPD0029

CONFIDENTIAL

5/19/2008

## TSS: Temp Schedule Report

Page 20 of 24

|              |                                                                                          |                                       |       |       |                              |              |
|--------------|------------------------------------------------------------------------------------------|---------------------------------------|-------|-------|------------------------------|--------------|
| 02/16/08 Sat | Las Vegas, NV 89101<br>P 702-455-5367 F 702-383-9574<br>Centennial Hills Hospital        | FILLED 7P - 7A 12 (5) (Per Diem)      | 12.00 | 12.00 | CNA - Clinic - Lionel-Agassi | C misimmons  |
| 02/18/08 Mon | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 6P - 6A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C misimmons  |
| 02/19/08 Tue | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 6P - 6A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C misimmons  |
| 02/20/08 Wed | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 6P - 7A 13 (5) (Per Diem)      | 12.50 | 12.50 | CNA - MedSurg                | C bonniapyle |
| 02/21/08 Thu | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 02/22/08 Fri | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 02/23/08 Sat | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 02/24/08 Sun | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 02/26/08 Tue | Las Vegas, NV 89101<br>P 702-455-5367 F 702-383-9574<br>Centennial Hills Hospital        | FILLED 10P - 7A 9 (5) (Per Diem)      | 9.00  | 9.00  | CNA - Clinic - Dylan-Bigelow | C bonniapyle |
| 02/27/08 Wed | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 02/28/08 Thu | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 11.50 | CNA - MedSurg                | C bonniapyle |
| 03/01/08 Sat | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 8A 13 (5) (Per Diem)      | 12.50 | 12.50 | CNA - MedSurg                | C bonniapyle |
| 03/02/08 Sun | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Stam<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg                | C bonniapyle |

http://web5.securetas.com/ans/reports/r\_tempschedule.cfm

5/19/2008

CONFIDENTIAL

LVMPD0030

PA3025

## TSS: Temp Schedule Report

Page 21 of 24

|              |                                                                                                                                                            |                                        |       |                              |              |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-------|------------------------------|--------------|
| 03/05/08 Wed | P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | CNA - MedSurg                | C bonniepyle |
| 03/06/08 Thu | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital                                         | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | CNA - MedSurg                | C bonniepyle |
| 03/07/08 Fri | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Department of Family Services-ChildHaven                          | FILLED 7:30A - 11:30A 4 (1) (Per Diem) | 4.00  | CNA - MedSurg                | C bonniepyle |
| 03/07/08 Fri | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 P 702-383-9574<br>Centennial Hills Hospital                                                         | FILLED 10P - 7A 9 (5) (Per Diem)       | 9.00  | CNA - Clinic - Dylan-Bigelow | C bonniepyle |
| 03/08/08 Sat | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Department of Family Services-ChildHaven                          | FILLED 7P - 7:30A 11.5 (5) (Per Diem)  | 11.00 | CNA - MedSurg                | C bonniepyle |
| 03/09/08 Sun | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 P 702-383-9574<br>Centennial Hills Hospital                                                         | FILLED 7P - 7A 12 (5) (Per Diem)       | 12.00 | CNA - Clinic - Lionel-Agassi | C bonniepyle |
| 03/11/08 Tue | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital                                         | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | CNA - MedSurg                | C malinmons  |
| 03/12/08 Wed | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Department of Family Services-ChildHaven                          | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | CNA - MedSurg                | C malinmons  |
| 03/13/08 Thu | 701 N. Pecos<br>Las Vegas, NV 89101<br>P (702)455-5367 P 702-383-9574<br>Centennial Hills Hospital                                                         | FILLED 7P - 7A 12 (5) (Per Diem)       | 12.00 | CNA - Clinic - Angela/Nevesh | C malinmons  |
| 03/15/08 Sat | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital                                         | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | CNA - MedSurg                | C malinmons  |
| 03/16/08 Sun | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital                                         | FILLED 7P - 7A 12 (5) (Per Diem)       | 11.50 | CNA - ER                     | C malinmons  |
| 03/18/08 Tue | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital                                         | FILLED 7P - 7A 12 (5) (Per Diem)       | 11.50 | CNA - ER                     | C malinmons  |

http://web5.securetrss.com/ans/reports/rf\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0031

PA3026

## TSS: Temp Schedule Report

Page 22 of 24

|              |                                                                                                                                                                                      |                                       |       |       |                        |               |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------|-------|------------------------|---------------|
| 03/19/08 Wed | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 12.00 | CNA - ER               | C mismons     |
| 03/20/08 Thu | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 03/21/08 Fri | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C mismons     |
| 03/22/08 Sat | Southwest Nevada Adult Mental Health-Rawson Neal Hospital<br>1650 Community College Drive<br>Las Vegas, NV 89146<br>P 702-835-9700 (CELL) 702-917-9105 P 702-486-0045 staff 486-0676 | FILLED 11P - 7:30A 8.5 (3) (Per Diem) | 8.00  | 8.00  | CNA - psych - POU Unit | C mismons     |
| 03/23/08 Sun | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C mismons     |
| 03/25/08 Tue | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 03/26/08 Sat | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 03/29/08 Sun | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 03/30/08 Mon | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7A 12 (5) (Per Diem)      | 11.50 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 04/01/08 Tue | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 04/02/08 Wed | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg          | C bonnapstyle |
| 04/03/08 Thu | Centennial Hills Hospital<br>6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff                                                                   | FILLED 7P - 7P 24 (5) (Per Diem)      | 23.50 | 12.00 | CNA - MedSurg          | C bonnapstyle |

CONFIDENTIAL

http://web5.securesss.com/ans/reports/r\_tempschedule.cfm

5/19/2008

LVMPD0032

PA3027

## TSS: Temp Schedule Report

Page 23 of 24

|              |                                                                                                                    |                                       |       |       |               |               |
|--------------|--------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------|-------|---------------|---------------|
| 04/04/08 Fri | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/05/08 Sat | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/06/08 Sun | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7P 24 (5) (Per Diem)      | 23.50 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/08/08 Tue | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/09/08 Wed | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/10/08 Thu | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/13/08 Sun | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/14/08 Mon | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/22/08 Tue | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/23/08 Wed | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/25/08 Fri | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |
| 04/26/08 Sat | 6900 N. Durango Drive<br>Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital | FILLED 7P - 7:30A 12.5 (5) (Per Diem) | 12.00 | 12.00 | CNA - MedSurg | C bonniestyle |

http://web5.secure.tss.com/ans/reports/t\_tempschedule.cfm

CONFIDENTIAL

5/19/2008

LVMPD0033

PA3028

TSS: Temp Schedule Report

Page 24 of 24

|                                                                                                                                     |                                                                                                                    |                                        |       |       |               |              |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|----------------------------------------|-------|-------|---------------|--------------|
| 04/27/08 Sun                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | 12.00 | CNA - MedSurg | C bannlepyle |
| 04/28/08 Mon                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 8:30A 13.5 (5) (Per Diem)  | 13.00 | 13.00 | CNA - MedSurg | C bannlepyle |
| 05/02/08 Fri                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | 12.00 | CNA - MedSurg | C bannlepyle |
| 05/03/08 Sat                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 12:30P 17.5 (5) (Per Diem) | 17.00 | 5.50  | CNA - MedSurg | C bannlepyle |
| 05/05/08 Mon                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 7:30A 12.5 (5) (Per Diem)  | 12.00 | 12.00 | CNA - MedSurg | C bannlepyle |
| 05/14/08 Wed                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 7A 12 (5) (Per Diem)       | 11.50 | 0.00  | CNA - MedSurg | C maimmons   |
| 05/15/08 Thu                                                                                                                        | Las Vegas, NV 89149-4409<br>P 702-835-9700 702629-1477 Staff<br>Centennial Hills Hospital<br>6900 N. Durango Drive | FILLED 7P - 7A 12 (5) (Per Diem)       | 11.50 | 0.00  | CNA - MedSurg | C maimmons   |
| <div> <div>SHF#at 283 Actual Hours: 2472.50</div> <div> <div>Clients Served: 7</div> <div>Sched. Hours: 2545.00</div> </div> </div> |                                                                                                                    |                                        |       |       |               |              |

| GRAND TOTALS     |         |
|------------------|---------|
| Shifts:          | 283     |
| Scheduled Hours: | 2545.00 |
| Actual Hours:    | 2472.50 |
| Tempers Worked:  | 1       |
| Clients Served:  | 7       |

CONFIDENTIAL

[http://web5.securecsa.com/ana/reports/r\\_tempschedule.cfm](http://web5.securecsa.com/ana/reports/r_tempschedule.cfm)

5/19/2008

LVMPD0034

PA3029

LVMPD0035


**American Nursing Services, Inc.**  
 PROFESSIONALS WHO CARE

www.american-nurse.com

Corporate Office - 3012 26th Street, Metairie, LA 70002 • (800) 444-6877


**American Health Care Recruiters, Inc.**

 3012 26th STREET • METAIRIE, LA 70002  
 (504) 837-2233 • (800) 333-4437

 Anchorage, AK (907) 345-5919  
 Atlanta, GA (404) 329-0353  
 Baton Rouge, LA (225) 761-6996  
 Dallas, TX (214) 987-3366  
 Gulfport, MS (228) 896-7001

 Jackson, MS (601) 321-0599  
 Lafayette, LA (337) 593-8600  
 Las Vegas, NV (702) 638-1200  
 Lexington, KY (859) 299-2339  
 Mandeville, LA (985) 951-8283

 Miami, FL (305) 629-2657  
 Monroe, LA (318) 325-5100  
 Rochester, NY (585) 244-0010  
 San Antonio, TX (210) 614-9009  
 Santa Rosa, CA (707) 527-0700

 Shreveport, LA (318) 425-2641  
 Tampa, FL (813) 288-1977  
 Tyler, TX (903) 526-6877
**CONFIDENTIAL**

## APPLICATION CURRICULUM VITAE

 Today's Date 10/04/2005 Social Security Number \_\_\_\_\_

 Name FARMER STEVEN PALE  
Last First Middle

 Present Address 1600 Cunningham Wy Santa Rosa CA 95403  
Street City State/Province Zip/Postal Code

 Present Phone (707) 332-5894 Work ( ) SAME

 Permanent Address \_\_\_\_\_  
Street City State/Province Zip/Postal Code

Permanent Phone ( ) \_\_\_\_\_ Work ( ) \_\_\_\_\_

 E-Mail Address SEMRIC@Yahoo.com Best Time to Reach You X a.m. X p.m.

 Are you legally eligible for employment in the United States? Yes YES No \_\_\_\_\_

 Were you previously employed by this company? Yes \_\_\_\_\_ No NO

Yes, give position(s) and date(s) worked \_\_\_\_\_

 Have you ever worked or are you presently working with any traveling nurse companies? \_\_\_\_\_  
 If so, give name \_\_\_\_\_

 \*Have you ever been convicted of a Felony? Yes \_\_\_\_\_ No NO

If yes, attach separate sheet with explanation.

 REFERRAL SOURCE: Journal Ad \_\_\_\_\_ Newspaper Ad \_\_\_\_\_  
Name Name

 Convention \_\_\_\_\_ Individual \_\_\_\_\_  
Name Name

 Other \_\_\_\_\_  
Name

## PERSONAL REFERENCES

PLEASE GIVE THREE REFERENCES, EXCLUDING RELATIVES AND FORMER EMPLOYERS, WHOM YOU HAVE KNOWN AT LEAST ONE YEAR.

| NAME                   | ADDRESS | PHONE                 | OCCUPATION        | YEARS KNOWN |
|------------------------|---------|-----------------------|-------------------|-------------|
| 1. <u>ANDY CARR</u>    |         | <u>(707) 246-2691</u> | <u>NURSE (RN)</u> |             |
| 2. <u>KAY ROSE</u>     |         | <u>(707) 253-1901</u> | <u>NURSE (RN)</u> |             |
| 3. <u>LESLIE HELMS</u> |         | <u>(707) 566-8990</u> | <u>CNA (CNA)</u>  |             |

 \*Conviction of a crime will not result in automatic disqualification  
 American Nurse Santa Rosa 707 523 9578 P.O. 101

JUN-06-2007 09:43

PA3030

5/16/08 12:43:06 iSeries Timekeeper: Centennial Hills ..... 340

STOUTC

Emp#: 74100403 AMERICAN NURSING 3 Badge: 74100403

Pay Period

Options: 1=Edit 4=Del 8=Brkdwn A=Appr F=ForceOT

From: 5/11/08

Position:

To: 5/24/08

| Opt | Date    | In      | Out  | Hours | Sch | Pcd | Ap | Department | Notes |
|-----|---------|---------|------|-------|-----|-----|----|------------|-------|
| WE  | 5/14/08 | 18:49 U | 7:23 | 12.25 |     |     | 0  | 6060       | A     |
| TH  | 5/15/08 | 18:53 U | 7:25 | 12.00 |     |     | 0  | 6060       | A     |

CONFIDENTIAL

REGS1 24.25

Bottom

Breakdown: 24.25 Total: 24.25

|             |               |             |             |              |               |
|-------------|---------------|-------------|-------------|--------------|---------------|
| F6=Add      | F7=Open/Close | F8=Adjust   | F9/10=Pr/Nx | F11=Charge   | F12=Cancel    |
| F13=Rounded | F14=Defaults  | F15=Punches | F16=Audit   | F18=Schedule |               |
| F19=Ins Pun | F20=Del Pun   | F21=Attend  | F22=OT Eq   | F23=Summary  | F24=Shift Hrs |

LVMPD0036

PA3031



CONFIDENTIAL

| CENTENNIAL HILLS ED ADMIT LOG                                                                            |                                     |                                      |       |                |                                                                                              |                                                                                  |                        |                       |                  |
|----------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------------------|-------|----------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|------------------------|-----------------------|------------------|
| DATE                                                                                                     |                                     | PAGE 2                               |       | DATE 5/16/2008 |                                                                                              |                                                                                  |                        |                       |                  |
| Date                                                                                                     | Patient's Name                      | Diagnosis                            | ER DR | Admitting DR   | Disposition Time                                                                             | Time Super. Was Called                                                           | In Patient Bed #       | Time To Floor         | Reason For Delay |
| 5/15/08<br>Time into ED Bed 10<br>DOB: 8000118219<br>MRN: 3005521<br>DOB: 8/1/78<br>ADM/REG DT: 05/15/08 | Seizure Headache                    | Slaughter<br>Time Seen by ER DR 0040 |       | Shing          | 0230<br>MS28<br>Bed Type<br>Time Super. Called Back<br>MS28<br>In Patient Bed # 0235<br>AD 7 | 0230<br>MS28<br>Time Super. Called Back<br>MS28<br>In Patient Bed # 0235<br>AD 7 | 717                    | 0951<br>MS<br>REQUEST | MIDAS            |
| 5/16/08<br>Time into ED Bed 9<br>DOB: 8000118417<br>MRN: 3005532<br>DOB: 5/2/78<br>ADM/REG DT: 05/16/08  | CP                                  | Slaughter<br>Time Seen by ER DR 0115 |       | Shing          | 0950<br>MT28<br>Bed Type<br>Time Super. Called Back<br>MT28<br>In Patient Bed # 0400<br>AD 8 | 0400<br>MT28<br>Time Super. Called Back<br>MT28<br>In Patient Bed # 0400<br>AD 8 |                        |                       | MIDAS            |
| 5/16/08<br>Time into ED Bed 14<br>DOB: 8000118474<br>MRN: 3005533<br>DOB: 7/5/78<br>ADM/REG DT: 05/16/08 | L3 Compression Fr. Intractable Pain | Jeser<br>Time Seen by ER DR 0005     |       | Shing          | 0605<br>MS28<br>Bed Type<br>Time Super. Called Back<br>MS28<br>In Patient Bed # 0620<br>AD 2 | 0620<br>MS28<br>Time Super. Called Back<br>MS28<br>In Patient Bed # 0620<br>AD 2 |                        |                       | MIDAS            |
| Time into ED Bed                                                                                         |                                     | Time Seen by ER DR                   |       |                | Disposition Time                                                                             | Time Super. Was Called                                                           | In Patient Bed #       | Time To Floor         | Reason For Delay |
|                                                                                                          |                                     |                                      |       |                | Bed Type                                                                                     | Time Super. Called Back                                                          | Time Room Was Assigned | MS<br>REQUEST         |                  |
|                                                                                                          |                                     |                                      |       |                | Disposition Time                                                                             | Time Super. Was Called                                                           | In Patient Bed #       | Time To Floor         | Reason For Delay |
|                                                                                                          |                                     |                                      |       |                | Bed Type                                                                                     | Time Super. Called Back                                                          | Time Room Was Assigned | MS<br>REQUEST         |                  |
|                                                                                                          |                                     |                                      |       |                | Disposition Time                                                                             | Time Super. Was Called                                                           | In Patient Bed #       | Time To Floor         | Reason For Delay |
|                                                                                                          |                                     |                                      |       |                | Bed Type                                                                                     | Time Super. Called Back                                                          | Time Room Was Assigned | MS<br>REQUEST         |                  |
|                                                                                                          |                                     |                                      |       |                | Disposition Time                                                                             | Time Super. Was Called                                                           | In Patient Bed #       | Time To Floor         | Reason For Delay |
|                                                                                                          |                                     |                                      |       |                | Bed Type                                                                                     | Time Super. Called Back                                                          | Time Room Was Assigned | MS<br>REQUEST         |                  |

Admission Date: 05/15/2008 20:21  
Med. Record No: 7009528  
Visit Number: 8000118219  
Attending Phys: Shuja, Amir MD  
Resident Phys: NA

**Centennial Hills Hospital Medical Center**  
**Individual Patient Note**  
**and Any/All Addenda**

Patient: [REDACTED]  
DOB: [REDACTED] Age: 34 y  
Gender: Female  
Location: 7N  
Room/Bed: 725J01

**NUR Note, performed 05/16/2008 05:44, entered 05/16/2008 05:48 by Murray, RN, Christine.**

0445: Pt to floor on stretcher-VSS-heavily sedated-needed assistance to walk to the bathroom. Stated "My headache is still not gone" I told her to sleep and that would help her HA.

0530: Pt sleeping no s/s of distress noted at this time-railings have been padded to protect pt from harm

**CONFIDENTIAL**

**Centennial Hills Medical Center**

Admission Date: 5/15/08  
Med. record No.: 7009528  
Visit No.: 8000118219  
Attending Phys.: Shuja, Amir, MD  
Allergies: No Known Allergies

**Admission Assessment**

Patient: [REDACTED]  
D.O.B.: [REDACTED] Age: 34  
Gender: Female  
Location: 7N  
Room/Bed: 725/01

Scheduled: 5/16/08 02:42

User: Christine Murray, RN

Performed: 5/16/08 04:50

Status: Finished

**Current Illness**

Information obtained from patient. Diagnosis: and Seizures/Headaches. Patient was not hospitalized in the last 60 days. Patient does not object to a blood transfusion if needed. No history of previous blood transfusion. History of previous anesthesia. Date of previous anesthesia: 02/10/2005. No reaction to anesthesia.

**Past Medical/Surgical History**

Patient's HEENT past medical history includes headache.

**Reproductive History**

LMP: 04/20/2008. Patient is not pregnant.

**Psych-Social History**

Patient has not used tobacco in the last 12 months. Caregiver has not used tobacco in the last 12 months. Patient denies being threatened or physically hurt in the last 12 months. There is no evidence of abuse and/or neglect.

**Nutrition History**

Nutrition history assessed and no concerns were identified.

**Vaccine Information**

Patient has not received the influenza vaccine.  
Patient has not received the pneumonia vaccine.

**Diabetes**

Patient does not have diabetes.

**Vitals on Admission**

Patient's stated height is 160 cm (5 ft 3 in ). Patient's stated weight is 56.7 kg (125 lb ).  
Oral temperature 98.1 F (36.72 C ).  
Brachial pulse 78 bpm while patient lying.  
RR 18.  
Patient on room air.  
Right Arm BP 110/ 74 mmHg. via machine while patient lying.

**Arrival Data**

Patient Arrived onto unit: 05/16/2008 04:45. Arrived via stretcher. Admitted from ED. Emergency contact is Scott; Relation to patient: Friend. Can be reached at [REDACTED] (Work). Patient oriented to the following: electrical appliances, visiting hours, bathroom call light, bed operation, smoking policy, phone, call light and dietary services. ID bracelet on. Allergy bracelet not applicable.

**Assistive Devices Inventory**

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**CONFIDENTIAL**

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**Assistive Devices Inventory (continued)**

No assistive devices at time of admission.

**Advance Directives**

Patient does not have an Advance Directive. Information offered to patient and was refused.

**Braden Risk**

Sensory Perception: No Impairment; Moisture: Rarely Moist; Activity: Walks Occasionally; Mobility: Slightly Limited; Nutrition: Adequate; Friction/Shearing: No Problem; Braden Risk Score = 20. Basic standards of practice were implemented per hospital policy, based on the Braden Risk Assessment score and clinical judgement.

**Fall Risk Assessment**

Fall Risk Score= 30.

History of falling since admission or within the last 3 months: No.

Secondary diagnosis noted which could increase risk of a fall: No.

Ambulatory aid: None or on bed rest.

IV/Saline Lock present: Yes.

Gait/Transferring: Weak.

Mental status: Oriented to own ability.

Patient is taking 3 or less medications from the following list: Anesthesia within past 48 hours, Anticoagulants, Antidepressants, Benzodiazepines, Laxative/diuretics, Opioids (narcotics), Sedatives/hypnotics, Vasodilators.

Standard (low risk) Fall Prevention Interventions were implemented; based on a score of 25 - 50 obtained using the Fall Assessment and Intervention policy.

**Pain Initial**

Patient's level of pain is 0 (no pain). Numerical pain scale used to assess patient's pain level. Use of pain scale was explained to patient and/or family.

**Home Medication**

Phenobarb 64.8mgAM/1/2NitePO, last dose prior to admission 05/14/2008; left at home.

**Learning Needs**

Primary language is English. Patient does not have any barriers to learning.. Patient does not have cultural restrictions. Patient does not have religious restrictions.

**Anticipated Discharge Plan**

Patient lives with family. Family relationship/name: Scott/Friend. Anticipated discharge/transfer to home. Person who can assist is Scott & family ; can be reached at [REDACTED]. Relation to patient: family.

**Education Needs**

Patient exhibits knowledge about health problem/treatment. Patient exhibits knowledge about managing the health problem/treatment. Patient's preferred learning methods include 1:1. No factors affect the patient's ability to learn. Plan of Care initiated: yes.

**Spiritual Assessment**

No religious or spiritual concerns. Patient does not wish to specify a religious or spiritual preference.

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**HEENT**

Blurred vision bilaterally. Additional HEENT related comments: Blurred vision before seizures.

**NeuroMusculoSkeletal**

WNL as evidenced by: Alert and oriented to person, place and time. Moves all extremities. Glasgow Coma Scale assessment not required at this time. GCS: 0.

**Orthopaedic Assessment**

Orthopaedic assessment is not indicated for this patient at this time.

**Cardiovascular**

WNL as evidenced by: Pulses regular and palpable. No peripheral edema. Skin warm, dry to touch, color within individual normal limits.

**Respiratory**

WNL as evidenced by: Respirations even and unlabored. Breath sounds clear bilaterally.

**Gastrointestinal**

WNL as evidenced by: Abdomen soft, non-tender, bowel sounds active. Last BM date: 05/16/2008.

**Genitourinary**

WNL as evidenced by: Continent, voids without difficulty or pain. Urine color within individual normal limits.

**Integumentary**

WNL as evidenced by: Skin integrity intact. Tissues show no evidence of redness, inflammation, rashes, ulcerations or wounds. No surgical tubes/drains.

**IV Information**

Peripheral IV in Right Forearm. Gauge: 20. Site is patent. Inserted 05/15/2008.

**Functional Assessment**

WNL as evidenced by: Ability to stand and walk with steady gait. No change in patients usual level of functioning.

**Equipment**

No additional equipment is being used at this time.

**Restraints**

Patient is not in restraints.

**Psych/Knowledge**

Patient's behavior/mood is sedated. Patient is not at risk for wandering. Additional Psych/Knowledge related comments: Pt sedated c/o HA-verbally rambling-needs assistant to the bathroom.

**Occurrence History for Admission Assessment**

| Effective     | Status     | User                  |
|---------------|------------|-----------------------|
| 5/16/08 06:29 | Finished   | Murray, RN, Christine |
| 5/16/08 05:18 | Unfinished | Murray, RN, Christine |

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**CONFIDENTIAL**

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**Consults & Notices Needed**

**Referrals and Notices**

**Standard Notice Information**

No factors affect the patient's ability to learn.

Patient's preferred learning methods include 1:1.

Primary language is English.

Diagnosis: and Seizures/Headaches.

Basic standards of practice were implemented per hospital policy, based on the Braden Risk Assessment score and clinical judgement.

**Belongings Inventory**

The following belongings were identified: shirt/blouse described as print-green&red kept at bedside; pants/slacks described as blue jeans kept at bedside; shoes/slippers described as white slipper socks kept at bedside; underwear described as grey bra-panties beige kept at bedside; wallet/purse described as tapestry/black kept at bedside; sunglasses described as white kept at bedside; electronics described as maroon cell phone kept at bedside; no other belongings noted.

**Home Medication**

Phenabarb 64.8mgAM/1/2NitePO, last dose prior to admission 05/14/2008; left at home.

**Money in Patient's Possession on Arrival**

If money was in patient's possession upon arrival, the nurse admitting the patient and a witness must sign below confirming the amount documented in the Valuables Inventory Section above. (Leave blank if no money in patient's possession on arrival.)

\_\_\_\_\_  
Admitting Nurse

\_\_\_\_\_  
Date & Time

\_\_\_\_\_  
Employee Witness

\_\_\_\_\_  
Date & Time

**Liability Waiver for Personal Belongings/Medications**

The hospital will not be responsible for valuables that are not considered necessary for the patients activities of daily living such as credit cards, jewelry, and cash that are not checked in with Security.

\_\_\_\_\_  
Printed name

\_\_\_\_\_  
Relationship to patient

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date & Time

Reported: 5/16/08 11:04

Patient (Hosp/Visit) No.: 8000118219

**CONFIDENTIAL**

**McGLINCHEY STAFFORD PLLC**

ATTORNEYS AT LAW

BRANDY N. SHEELY  
(504) 596-2866  
Fax (504) 596-2870  
bsheely@mcglinchey.com

LOUISIANA MISSISSIPPI NEW YORK OHIO TEXAS

May 23, 2008

*Via Email H8651J@LVMPD.COM*  
I/S Ruth Gorski (for Sgt. Pence)  
c/o Heather Jackson, P8651  
Las Vegas Metropolitan Police Department

Re: Administrative Subpoena Issued to American Nursing Services, Inc.  
Our File No.: 018719.PM15214


Dear Ms. Gorski:

Please find attached documents responsive to the Administrative Subpoena issued to American Nursing Services, Inc. At your convenience, please confirm that the Administrative Subpoena has been satisfied.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely yours,

McGlinchey Stafford, PLLC

  
Monica A. Frois  
Brandy N. Sheely

Attachments

cc: Ms. Johnette Spellman (via e-mail) (w/attachments)

755993.1

643 Magazine Street • New Orleans, LA 70130-3477 • (504) 586-1200 • Fax (504) 596-2800 • TDD (504) 596-7728 • www.mcglinchey.com

LVMPD0043

PA3038

CONFIDENTIAL

MAY-16-2008 15:59

American Nurse Las Vegas

702 638 8522 P.01



**American Nursing Services INC.**  
PROFESSIONALS WHO CARE

www.american-nurse.com

Corporate Office - 3012 26th Street, Metairie, LA 70002 • (800) 444-6877



**American Health Care Recruiters**

3012 26th STREET • METAIRIE, LA 70002  
(504) 837-3223 • (800) 333-4447

Anchorage, AK (907) 345-3919  
Atlanta, GA (404) 329-0353  
Baton Rouge, LA (225) 761-4996  
Dallas, TX (214) 987-3366  
Gulfport, MS (228) 396-7001

Jackson, MS (601) 321-0599  
Lafayette, LA (337) 583-8600  
Las Vegas, NV (702) 638-1300  
Lexington, KY (606) 299-3339  
Mandeville, LA (985) 951-8283

Miami, FL (305) 629-2657  
Monroe, LA (337) 325-6100  
Rochester, NY (585) 244-0010  
San Antonio, TX (210) 614-9009  
Santa Rosa, CA (707) 527-0700

Shreveport, LA (518) 425-2641  
Tampa, FL (813) 288-1977  
Tyler, TX (903) 526-6877

## APPLICATION CURRICULUM VITAE

Today's Date 10/04/2005 Social Security Number: \_\_\_\_\_  
Name FARMER STEVEN PALE  
Last First Middle  
Present Address 1600 Cunningham Way Santa Rosa CA 95403  
Street City State/Province Zip/Postal Code  
Present Phone (707) 332-5894 Work ( ) SAME  
Permanent Address \_\_\_\_\_  
Street City State/Province Zip/Postal Code  
Permanent Phone ( ) \_\_\_\_\_ Work ( ) \_\_\_\_\_  
E-Mail Address SEANR16@yahoo.com Best Time to Reach You X a.m. X p.m.  
Are you legally eligible for employment in the United States? Yes YES No \_\_\_\_\_  
Were you previously employed by this company? Yes \_\_\_\_\_ No NO  
If Yes, give position(s) and date(s) worked \_\_\_\_\_

Have you ever worked or are you presently working with any traveling nurse companies? \_\_\_\_\_  
If so, give name \_\_\_\_\_

Have you ever been convicted of a Felony? Yes \_\_\_\_\_ No NO

If yes, attach separate sheet with explanation.

REFERRAL SOURCE: Journal Ad \_\_\_\_\_ Newspaper Ad \_\_\_\_\_  
Name Name  
Convention \_\_\_\_\_ Individual \_\_\_\_\_  
Name Name  
Other \_\_\_\_\_  
Name

## PERSONAL REFERENCES

PLEASE GIVE THREE REFERENCES, EXCLUDING RELATIVES AND FORMER EMPLOYERS, WHOM YOU HAVE KNOWN AT LEAST ONE YEAR.

| NAME                    | ADDRESS | PHONE               | OCCUPATION        | YEARS KNOWN |
|-------------------------|---------|---------------------|-------------------|-------------|
| 1. <u>ANDY CARR</u>     |         | <u>707 246-2691</u> | <u>NURSE(RN)</u>  |             |
| 2. <u>KAY ROSE</u>      |         | <u>707 253-1901</u> | <u>NURSE(RN)</u>  |             |
| 3. <u>LES LIE HELMS</u> |         | <u>707 566-8490</u> | <u>CNA(Nurse)</u> |             |

\*Conviction of a crime will not result in automatic disqualification  
1013 707 629 9578 American Nurse Staff Box

09:43 2007-06-09

LVMPD0044

PA3039



**CONFIDENTIAL**

MAY-15-2008 16:00

American Nurse Las Vegas

702 638 8522 P.02

## EMPLOYMENT PREFERENCE

POSITION CNA DATE AVAILABLE TO BEGIN WORK 10/07/2005  
 PERMANENT PLACEMENT X SHORT TERM ASSIGNMENT X NUMBER WEEKS DESIRED \_\_\_\_\_  
 CLINICAL AREA OF NURSING IN WHICH YOU HAVE WORKED (LISTING MOST RECENT FIRST):  
 1. \_\_\_\_\_ YEARS OF EXPERIENCE \_\_\_\_\_  
 2. \_\_\_\_\_ YEARS OF EXPERIENCE \_\_\_\_\_  
 3. \_\_\_\_\_ YEARS OF EXPERIENCE \_\_\_\_\_  
 SHIFT PREFERENCE: 1. \_\_\_\_\_ 2. \_\_\_\_\_ 3. \_\_\_\_\_  
 DESIRED GEOGRAPHICAL LOCATION OR FACILITY: 1. \_\_\_\_\_  
 2. \_\_\_\_\_ 3. \_\_\_\_\_

## LICENSURE

List all states in which you are currently licensed or have been licensed. Please attach photocopies of all current licenses.

| STATE | LICENSE # | EXP. DATE | STATE | LICENSE # | EXP. DATE |
|-------|-----------|-----------|-------|-----------|-----------|
|       |           |           |       |           |           |
|       |           |           |       |           |           |
|       |           |           |       |           |           |

LIST ANY INACTIVE LICENSES YOU MAY HAVE \_\_\_\_\_  
 HAS YOUR NURSING LICENSE EVER BEEN SUSPENDED, REVOKED, OR INVESTIGATED? YES \_\_\_\_\_ NO \_\_\_\_\_  
 IF YES, ATTACH SEPARATE SHEET WITH EXPLANATION.

## MALPRACTICE INSURANCE

DO YOU HAVE MALPRACTICE INSURANCE? YES \_\_\_\_\_ NO X  
 IF YES, MALPRACTICE INSURANCE POLICY NO. \_\_\_\_\_  
 COMPANY \_\_\_\_\_  
 EXPIRATION DATE OF POLICY \_\_\_\_\_  
 ENCLOSE COPY OF POLICY.

## EDUCATION

| EDUCATION                    | NAME AND ADDRESS OF SCHOOL |       | YEAR ATTENDED | YEAR COMPLETED | WAS YOU GRADUATED | DEGREE | GPA |
|------------------------------|----------------------------|-------|---------------|----------------|-------------------|--------|-----|
| HIGH SCHOOL                  |                            |       | FROM          | TO             | YES               | DEGREE |     |
|                              | CITY                       | STATE | NO            | TO             | NO                | DEGREE |     |
| COLLEGE OR SCHOOL OF NURSING |                            |       | FROM          | TO             | YES               | DEGREE |     |
|                              | CITY                       | STATE | NO            | TO             | NO                | DEGREE |     |
| UNIVERSITY SCHOOL            |                            |       | FROM          | TO             | YES               | DEGREE |     |
|                              | CITY                       | STATE | NO            | TO             | NO                | DEGREE |     |
| OTHER SCHOOL                 |                            |       | FROM          | TO             | YES               | DEGREE |     |
|                              | CITY                       | STATE | NO            | TO             | NO                | DEGREE |     |

## CONTINUING EDUCATION / CERTIFICATION

CONTINUING EDUCATION (PLEASE ENCLOSE COPIES) \_\_\_\_\_  
 CRITICAL CARE COURSE \_\_\_\_\_ ENG COURSE YES \_\_\_\_\_ NO \_\_\_\_\_  
 ARE YOU CPR/CPRC CERTIFIED? YES X NO \_\_\_\_\_ DATE TAKEN: OCT 2005 EXPIRATION DATE: OCT 2005  
 PLEASE ENCLOSE COPIES OF CPR CERTIFICATION. YOU MUST HAVE CURRENT CPR PRIOR TO ASSIGNMENT.  
 SPECIALTY CERTIFICATION (CCRN, CEN etc.) PLEASE ENCLOSE COPIES \_\_\_\_\_

702 638 8522 P.02

American Nurse Santa Rosa

JUN-06-2007 09:43

LVMPD0045

PA3040

CONFIDENTIAL

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8522 P.03

# EMPLOYMENT HISTORY

List most recent employment first.

All employment must be recorded; use additional sheets as necessary.

Any breaks in employment must be explained.  
Explanations, if necessary.

|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Employer _____                        | Dept. / Unit / Floor _____                        |
| Immediate Supervisor _____            | Phone ( ) _____                                   |
| Address _____                         | Dates Employed (Mo./Day/Yr.): From _____ To _____ |
| City / State / Province / Zip _____   | Duties _____                                      |
| Position Held _____                   | Charge Experience _____                           |
| Specialty _____                       | Number and Title of Employees Supervised _____    |
| Number of beds _____                  | Reason For Leaving _____                          |
| Type of Nursing (Primary, etc.) _____ | Was this a travel assignment? Yes _____ No _____  |
| Average No. Hours per week _____      |                                                   |

|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Employer _____                        | Dept. / Unit / Floor _____                        |
| Immediate Supervisor _____            | Phone ( ) _____                                   |
| Address _____                         | Dates Employed (Mo./Day/Yr.): From _____ To _____ |
| City / State / Province / Zip _____   | Duties _____                                      |
| Position Held _____                   | Charge Experience _____                           |
| Specialty _____                       | Number and Title of Employees Supervised _____    |
| Number of beds _____                  | Reason For Leaving _____                          |
| Type of Nursing (Primary, etc.) _____ | Was this a travel assignment? Yes _____ No _____  |
| Average No. Hours per week _____      |                                                   |

|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Employer _____                        | Dept. / Unit / Floor _____                        |
| Immediate Supervisor _____            | Phone ( ) _____                                   |
| Address _____                         | Dates Employed (Mo./Day/Yr.): From _____ To _____ |
| City / State / Province / Zip _____   | Duties _____                                      |
| Position Held _____                   | Charge Experience _____                           |
| Specialty _____                       | Number and Title of Employees Supervised _____    |
| Number of beds _____                  | Reason For Leaving _____                          |
| Type of Nursing (Primary, etc.) _____ | Was this a travel assignment? Yes _____ No _____  |
| Average No. Hours per week _____      |                                                   |

|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Employer _____                        | Dept. / Unit / Floor _____                        |
| Immediate Supervisor _____            | Phone ( ) _____                                   |
| Address _____                         | Dates Employed (Mo./Day/Yr.): From _____ To _____ |
| City / State / Province / Zip _____   | Duties _____                                      |
| Position Held _____                   | Charge Experience _____                           |
| Specialty _____                       | Number and Title of Employees Supervised _____    |
| Number of beds _____                  | Reason For Leaving _____                          |
| Type of Nursing (Primary, etc.) _____ | Was this a travel assignment? Yes _____ No _____  |
| Average No. Hours per week _____      |                                                   |

|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Employer _____                        | Dept. / Unit / Floor _____                        |
| Immediate Supervisor _____            | Phone ( ) _____                                   |
| Address _____                         | Dates Employed (Mo./Day/Yr.): From _____ To _____ |
| City / State / Province / Zip _____   | Duties _____                                      |
| Position Held _____                   | Charge Experience _____                           |
| Specialty _____                       | Number and Title of Employees Supervised _____    |
| Number of beds _____                  | Reason For Leaving _____                          |
| Type of Nursing (Primary, etc.) _____ | Was this a travel assignment? Yes _____ No _____  |
| Average No. Hours per week _____      |                                                   |

Employment history continued on next page...

602 626 9678 P.03

American Nurse Santa Rosa

702-638-8522 09:13

LVMPD0046

PA3041

CONFIDENTIAL

MAY-16-2008 16:00

American Nurse Las Vegas

702 630 8522 P.04

employment history continued...

HAVE YOU EVER BEEN DISCHARGED FROM A JOB OR FORCED TO RESIGN? YES NO X  
IF YES, PLEASE EXPLAIN \_\_\_\_\_

MAY WE CONTACT YOUR PRESENT AND FORMER EMPLOYERS? YES X NO \_\_\_\_\_

## EMERGENCY

Please notify in case of emergency

1) Name TRACY FARMER Relationship BROTHER  
Address 14014th Ave. CALIENTE City/State/Zip SAULIMA CA 95476  
Phone (707) 996 7292 Phone (707) 287-2581

2) Name Sandra Farmer Relationship SISTER  
Address \_\_\_\_\_ City/State/Zip SAULIMA CA 95476  
Phone (707) 568 1513 Phone (707) 707 625 2008

I certify that all answers to questions in this application are true. I understand that any false or misleading information or omissions in this application shall result in ineligibility for employment or immediate dismissal. I further understand and agree American Nursing Services, Inc./American Health Care Recruiters, Inc., will require a health assessment prior to my employment and periodically thereafter as a condition of employment. I authorize American Nursing Services, Inc./American Health Care Recruiters, Inc., its agents, servants and employees to investigate all statements made in this application and to contact former employers, educational institutions, licensing and any and all other institutions, persons or agencies, and hereby authorize American Nursing Services, Inc./American Health Care Recruiters, Inc., its agents, servants, and employees, and said herein before identified organizations and persons to release any and all records, documents, and information relative to such inquiries, and I further hereby release any and all of said parties from any liability or responsibility in connection therewith. I agree that my references and/or a copy of my application may be disclosed to an authorized representative from a client hospital/institution of American Nursing Services, Inc./American Health Care Recruiters, Inc. as required by JCAHO requirements.

The Civil Rights Act of 1964 prohibits discrimination in employment because of race, color, religion, sex or national origin. Federal law also prohibits discrimination on the basis of age with respect to certain individuals. The laws of most States also prohibit some or all of the above types of discrimination as well as some additional types such as discrimination based upon ancestry, marital status or physical or mental handicap or disability.

DATE 10/14/2005 SIGNATURE Tracy Farmer  
DATE 10/14/06 INTERVIEWER [Signature]  
New CNA grad - working PT thru HHA  
@ Henderson Senior Living  
(3) shifts 1st choice  
& acute experience!!

P.04 707 630 8522

American Nurse Santa Rosa

JUN-06-2007 08:43

LVMPD0047

PA3042

**Steve Farmer**

P O BOX 19 Eldridge, CA 95431

(707) 332-5884

**Objective**

Secure a position as a CNA in a positive and caring community that allows me to use my diverse skills and experience.

**5 YR Work Experience**

**Healdsburg District Hospital**

11-2005 to Present

Sub-acute Med-Surg: Under the direction of an RN/LVN provided basic nursing care in a manner that promoted safety, comfort and maintained a healing environment, communicated to RN/LVN observations regarding patient conditions. I cared for patients with tracheotomy, colostomies, Foleys, G-tubes, in post-vegetative states, with brain tumors, strokes, dementia, diabetes, Alzheimer's, multiple heart attacks, and spinal cord injuries. I worked as Telly-Technician, hooked-up EKG leads, monitored heart rates and rhythms for patients. I also worked as a ward clerk building files, printing labels, processed admission papers work from ER, submitting MD orders to the pharmacy, entering information and orders into computer for appointments to OT, PT, labs, diets, activity levels and allergies.

**Skilled Nursing**

**American Nursing and At Home Nursing (both registries)**

9-2005 to 11-2005

Under the direction of an RN/LVN did total care for patients with conditions ranging from stroke, COPD, dementia, hip replacements, age related fall risk, wheelchair bound, obesity, dementia, diabetes, Alzheimer's, multiple heart attacks and other skilled nursing related illnesses. I also worked patients with spinal cord injuries Paraplegic and Quadriplegic.

**In Home Support Services**

11-2001 to 11-2004

Worked with patients in homes under the supervision of an RN/LVN took care of patient for 4 years with multiple strokes, diabetes (took blood sugars and monitored levels 4 times daily), multiple heart attacks, dysphasia, depression, de-cubits, assisted with all ADL's, transfers and prepared meals. I participated in patient education, included dietary and medication interactions, implemented programs and planned activities that supported speech therapy, PT, OT, handwriting skills, and other motor skills. Multiple strokes impeded recovery from hip replacement; provided motivation and training in use of a walker to minimize fall risk for patient recovery.

**Prior related experience**

1988 - 1989

Under the supervision of an RN/LVN worked with patient with inoperative terminal brain tumors. Including complete patient care for all ADL's and outings until death.

**Capabilities and Skills**

CPR and First Aid Instructor for Red Cross. Strong motivation for assisting others in loving the life they are living. Dedicated and mature with a professional attitude and willing to work. Work extremely well independently and as a team member, flexible and willing to assist where needed in situations of overload, remain calm and work well under demanding conditions. I am able to focus despite distractions and changing priorities, multi-task and coordinate projects to meet deadlines. Worked with people with diverse cultures and backgrounds, I have supervised and keep schedules for 15 + people. Tact and listening when asked for or when confronted with judgments concerning sensitive matters. Demonstrate communications skills both written and orally. I have excellent confidentiality and patient skills.

**Education**

|                                         |      |
|-----------------------------------------|------|
| Santa Rosa Jr College                   | 2006 |
| Red Cross CNA School                    | 2005 |
| Red Cross Home Health Aide              | 2005 |
| Red Cross Acute Care Training           | 2005 |
| Red Cross CPR and First Aide Instructor | 2005 |
| Certified Massage                       | 1996 |
| Chaffey High School (Grad)              | 1970 |
| Chaffey Jr College                      | 1973 |

CONFIDENTIAL

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8622 P.06

### Employment History

|       |         |               |                                            |                 |                |                     |                         |
|-------|---------|---------------|--------------------------------------------|-----------------|----------------|---------------------|-------------------------|
| From: | 11/05   | Company Name: | Henderson District Hospital                | May we contact: | No             | Contact Person:     | Isabel                  |
| To:   | Present | & Address:    | 1300 University Ave<br>Henderson, CA 95513 | Phone #:        | (707) 491-0000 | Reason For Leaving: | Relocating to Las Vegas |

|       |         |               |                                               |                 |                |                     |                                                |
|-------|---------|---------------|-----------------------------------------------|-----------------|----------------|---------------------|------------------------------------------------|
| From: | 08/05   | Company Name: | American Nursing                              | May we contact: | Yes            | Contact Person:     | Kelly Scott                                    |
| To:   | Present | & Address:    | 1260 Dutton St. Ste J<br>Santa Rosa, CA 95403 | Phone #:        | (707) 527-0700 | Reason For Leaving: | They have an office in Las Vegas, Transferring |

|       |         |               |                                                     |                 |                |                     |                 |
|-------|---------|---------------|-----------------------------------------------------|-----------------|----------------|---------------------|-----------------|
| From: | 08/05   | Company Name: | At Home Nursing                                     | May we contact: | Yes            | Contact Person:     | Human Resources |
| To:   | Present | & Address:    | 2227 Capricorn Way Ste 110b<br>Santa Rosa, CA 95403 | Phone #:        | (707) 544-0770 | Reason For Leaving: | Involve         |

|       |       |               |                                        |                 |                |                     |             |
|-------|-------|---------------|----------------------------------------|-----------------|----------------|---------------------|-------------|
| From: | 01/05 | Company Name: | Red Cross School                       | May we contact: | Yes            | Contact Person:     |             |
| To:   | 08/05 | & Address:    | 5257 Ave Drive<br>Santa Rosa, CA 95403 | Phone #:        | (707) 577-7800 | Reason For Leaving: | Quarantined |

|       |       |               |                                              |                 |     |                     |                                   |
|-------|-------|---------------|----------------------------------------------|-----------------|-----|---------------------|-----------------------------------|
| From: | 12/00 | Company Name: | In-Home Support Services                     | May we contact: | Yes | Contact Person:     |                                   |
| To:   | 11/04 | & Address:    | 2200 Northpoint Pkwy<br>Santa Rosa, CA 95403 | Phone #:        |     | Reason For Leaving: | Patient Priced and went to school |

|       |        |               |                             |                 |  |                     |  |
|-------|--------|---------------|-----------------------------|-----------------|--|---------------------|--|
| From: | 1990   | Company Name: | Self Employed (Real Estate) | May we contact: |  | Contact Person:     |  |
| To:   | Oct-00 | & Address:    | San Diego, CA 92006         | Phone #:        |  | Reason For Leaving: |  |

LVMPD0049

PA3044

**Steven D Farmer**

1800 Cunningham Way, Santa Rosa, CA 95403  
(707) 332-5884

**Position Applying for:**

**Capabilities & Skills**

- ♦ CPR and First Aid Instructor for Red Cross taking
- ♦ Strong motivation to assisting others in living a life they love
- ♦ Dedicated, professional attitude, mature and willing to work
- ♦ Work extremely well independently and cooperatively as a team member
- ♦ Ability to work with people from diverse cultures
- ♦ Manage special projects as necessary
- ♦ Demonstrate communications skills, both orally and in writing
- ♦ Flexibility and willing to assist where needed during periods of overload
- ♦ Text and listening when asked for or confronted with judgments concerning sensitive matters
- ♦ Ability to focus despite distractions and changing priorities
- ♦ Able to prioritize, multi-task, coordinate and handle multiple projects to meet deadlines
- ♦ Excellent patient skills and confidentiality experience
- ♦ Remain calm and work well under demanding conditions
- ♦ Supervised and kept schedules for 15+ people, including client database management
- ♦ Have received awards for ability to work with people for meeting or exceeding goals/achievements

**Cared for patients with:**

Multiple-Heart Attacks  
Brain Tumors  
COPD Problems  
Diabetes

Multiple-Strokes  
Dementia  
Dysphasia  
Depression

Hip Replacement  
Incontinent  
Esophagi  
Spinal Injury

**Patient Care Experience**

- ♦ Participated in patient education including dietary and medicine interaction and intervention
- ♦ Home hospice care for patient with terminal brain tumors until death.
- ♦ Implementation of program and planned activities that support patients recovery
- ♦ On two different occasions confronted with a crisis situations resulted in two saved lives
- ♦ Reinforced P.T. instructions and monitored patients' physical therapy to increase mobility.
- ♦ Taking, recording, assessing blood sugar 4 x daily and giving injections of insulin as needed
- ♦ Assisted with occupational therapy activities such as dressing, eating, drinking, speech therapy and handwriting skills and other motor functions

**Work History**

|                                                                  |           |
|------------------------------------------------------------------|-----------|
| Care for patient through HSS                                     | 2004-2005 |
| Worked with stroke/diabetic/COPD patient in home for four years. | 2001-2005 |
| Customer Service/ troubleshoot and promoting public relations    | 2000-2004 |
| Customer Consultant (Real Estate Sales & Loans)                  | 1995-2000 |

**Education**

|                                            |         |
|--------------------------------------------|---------|
| Graduated CNA (nursing assistant)          | 06/2005 |
| Passed State Test                          | 06/2005 |
| Completed HHA (Home Health Aid)            | 07/2005 |
| Completed Acute Care Training              | 07/2005 |
| CPR and First Aid Instructor for Red Cross | 10/2004 |
| Certified masseuse                         | 06/1998 |

CONFIDENTIAL

MAY-16-2008 16:01

American Nurse Las Vegas

702 630 8522 P.23



"Professionals who care."

American Nursing Services, Inc.

MECHANIC, LA • (504) 885-3100 • (800) 444-0877  
 NATIONWIDE, LA • (504) 885-3100  
 SPRINGFIELD, LA • (504) 885-3100  
 DALLAS, TX • (972) 885-3100  
 HOUSTON, TX • (713) 885-3100  
 SAN ANTONIO, TX • (214) 885-3100  
 LOS ANGELES, CA • (310) 885-3100  
 LOS ANGELES, CA • (310) 885-3100



American  
 Health Care  
 Recruiters, Inc.

2012 8501 STREET  
 MECHANIC, LA 70808  
 (504) 885-3100 • (800) 444-0877

### EMPLOYMENT REFERENCE

The individual whose signature appears below has applied for employment and has submitted your name as a former employer for reference purposes.

Due to the critical nature of our responsibility to our patients and client hospitals any consideration of this individual by this agency is dependent upon receipt of satisfactory references. Please be assured that your response will be kept in strictest confidence. Thank You.

Date 10/19/05 Agency Representative [Signature]

I hereby authorize you to hold the above request for information.

Date 10/19/2005 Applicant's Signature St. John Turner

Applicant's Name St. John Turner Social Security Number \_\_\_\_\_

Position Applied For CNA

Name of Previous Employer (Hospital/Agency) Helen Farnell Health Care Services, Inc. 95976

Attention Mr. Andy Carr Title LMN

Address 10101 W. 10th Avenue, Suite 100

City Westminster, CO State CO Zip/Postal Code \_\_\_\_\_ Phone ( ) \_\_\_\_\_

Position Held in Your Employer CNA

Employment Dates From \_\_\_\_\_ to \_\_\_\_\_

Reason For Leaving: Resigned \_\_\_\_\_ Terminated \_\_\_\_\_ Temporary Employee Yes

Is The Applicant Eligible For Rehire? Yes ☒ No ☐ If no, please explain. \_\_\_\_\_

| REFERENCE CRITERIA                | EMPLOYER | APPLICANT | APPLICANT | APPLICANT | APPLICANT |
|-----------------------------------|----------|-----------|-----------|-----------|-----------|
| QUALITY OF WORK                   |          | ✓         |           |           |           |
| QUANTITY OF WORK                  |          | ✓         |           |           |           |
| CLINICAL NURSING COMPETENCE       |          | ✓         |           |           |           |
| JUDGMENT                          |          | ✓         |           |           |           |
| ATTITUDE                          | ✓        |           |           |           |           |
| INITIATIVE                        |          | ✓         |           |           |           |
| INTERPERSONAL SKILLS              |          | ✓         |           |           |           |
| EMOTIONAL STABILITY               |          | ✓         |           |           |           |
| ADAPTABILITY TO WORK SITUATIONS   |          | ✓         |           |           |           |
| DEPENDABILITY                     |          | ✓         |           |           |           |
| COOPERATION / TEAMWORK            | ✓        |           |           |           |           |
| ABILITY TO ACCEPT LEADERSHIP ROLE |          | ✓         |           |           |           |
| ATTENDANCE & PUNCTUALITY          | ✓        |           |           |           |           |
| PERSONAL APPEARANCE               | ✓        |           |           |           |           |

COMMENTS

[Signature]  
 702 630 8522 P.27

American Nurse Santa Rosa

JUN-08-2007 08:17

LVMPD0051

CONFIDENTIAL

MAY-16-2008 16:01

American Nurse Las Vegas

702 638 8522 P.24



"Professionals who care."

American Nursing Services, Inc.

MEMPHIS, LA • (504) 333-2168 • (800) 444-3877  
 MEMPHIS, LA • (504) 333-4000  
 MEMPHIS, LA • (504) 333-4041  
 DALLAS, TX • (214) 333-2000  
 MEMPHIS, TX • (915) 333-2000  
 SAN DIEGO, CA • (619) 333-2222  
 LAS VEGAS, NV • (702) 333-2222



3912 39TH STREET  
 MEMPHIS, LA 70006  
 (504) 333-4100 • (800) 444-3877

American  
 Health Care  
 Recruiters, Inc.

### EMPLOYMENT REFERENCE

The individual whose signature appears below has applied for employment and has submitted your name as a former employer for reference purposes.

Due to the critical nature of our responsibility to our patients and client hospitals, consideration of this individual by this agency is dependent upon receipt of satisfactory references. Please be assured that your response will be kept in strictest confidence. Thank You.

Date 10/19/06 Agency Representative [Signature]

I hereby authorize you to fulfill the above request for information.

Date 10/19/2005 Applicant's Signature [Signature]

Applicant's Name Steve Gorman Social Security Number \_\_\_\_\_

Position Applied For CNA

Name of Previous Employer (Hospital/Agency/etc.) Helen Farmer 145 W. Alameda, San Jose, CA 95126

Attention Kay A. Rule Title Release Nurse

Address 101 Golden Gate Circle

City Hayward State/Province CA Zip/Postal Code 94538 Phone (415) 953-1901

Position Held in Your Employer: CNA

Employment Dates: From Sept 7, 2005 to presently

Reason For Leaving: Resigned \_\_\_\_\_ Terminated \_\_\_\_\_ Temporary Employee \_\_\_\_\_

Is The Applicant Eligible For Rehire? Yes \_\_\_\_\_ No \_\_\_\_\_ If no, please explain: \_\_\_\_\_

| REFERENCE                         | REFERENCE | REFERENCE | REFERENCE | REFERENCE |
|-----------------------------------|-----------|-----------|-----------|-----------|
| QUALITY OF WORK                   | ✓         |           |           |           |
| QUALITY OF WORK                   |           | ✓         |           |           |
| CLINICAL NURSING COMPETENCE       |           | ✓         |           |           |
| JUDGMENT                          |           | ✓         |           |           |
| ATTITUDE                          | ✓         |           |           |           |
| INITIATIVE                        | ✓         |           |           |           |
| INTERPERSONAL SKILLS              | ✓         |           |           |           |
| EMOTIONAL STABILITY               |           | ✓         |           |           |
| ADAPTABILITY TO WORK SITUATIONS   |           | ✓         |           |           |
| DEPENDABILITY                     | ✓         |           |           |           |
| COOPERATION / TEAMWORK            | ✓         |           |           |           |
| ABILITY TO ACCEPT LEADERSHIP ROLE |           | ✓         |           |           |
| ATTENDANCE & PUNCTUALITY          | ✓         |           |           |           |
| PERSONAL APPEARANCE               | ✓         |           |           |           |

COMMENTS \_\_\_\_\_

10/19/06 Kay A. Rule [Signature]

702 638 8522

American Nurse Santa Rosa

JUN-06-2007 08:47

LVMPD0052

PA3047



**CONFIDENTIAL**

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8522 P.08

1/30/06

Re: Steve Farmer

To whom it may Concern:

I have worked with Steve Farmer at Healdsburg District Hospital. As a Certified Nurses assistant he is one of the best I have ever worked with in my fifteen years of nursing. He does a great job with each and every patient. He is kind, compassionate and caring. He is great about reporting appropriate changes of conditions in vital signs, skin conditions and other important issues. He is always well groomed and clean. He works well with other staff and patients alike. He is efficient and able to complete his work well. He works well within his scope of practice.

I would highly recommend Steve Farmer to ANY facility.

Sincerely,

*Valerie K. Bender RN*

Valerie K. Bender

Registered Nurse  
4346 S.P. Road  
Casper, Wyoming 82604  
(307) 237-2286

LVMPD0053

PA3048

MAY-16-2009 16:00

American Nurse Las Vegas

702 639 8522 P.09

2/1/04

To whom it may concern.

I have worked with Steve Farmer since the time he has worked at Henderson District. Steve is always punctual and professional. His care to the patients cannot be beat. I never have to worry if my vitals are going to be taken and reported. The patients are bathed, cleaned and mouth care given without having to ask Steve. Steve knows what needs to be done and does it no questions asked. Steve also goes the extra mile - for instance he brought a patient a TV guide because he knew she would enjoy the TV guide. I would give Steve a recommendation anytime - he is a great nurse aid. Steve is a member of the staff and makes a great part of a team - always willing to help with anything - he enjoys learning.

Thank you  
Brigid Muck RV  
423-902-6903

LVMPD0054

PA3049

**CONFIDENTIAL**

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8622 P.10

August 24, 2006

To Whom it May Concern,

I came to the Healdsburg District Hospital as a travel nurse in May, 2006. I met Steve Farmer there and had the privilege to get to know and work with him. Steve has a fantastic work ethic. I have observed him consistently meet the patient care goals that have been assigned to him, with compassion for the patients and respect for the nurses and his fellow workers. Steve is a strong asset to our team and would benefit any organization that has a need for his experience in patient care. I've truly enjoyed working with him and wish him the absolute best.

Sincerely,



Randall L. Ernst RN  
(586) 260-5074

LVMPD0055

PA3050

**CONFIDENTIAL**

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8622 P.11

February 01, 2006

To whom it may concern,

I am writing this letter of recommendation on behalf of Steven Farmer. I have been working with Steven Farmer at Healdsburg District Hospital. I am very pleased with his performance as a certified nursing assistant. Steve is eager and willing to learn how to improve his skills, he works well with others and needs little or no supervision. Steve also works very hard to provide excellent care for the patients he is assigned, he accomplishes this by anticipating their needs in advance. I can always count on him notifying me of any changes in conditions or concerns he might have for their well-being. Steve also brings new ideas to assist in providing better care for his patients. He completes his duties and documentation accurately, completely and in a timely manner. I would recommend him highly; Steve Farmer would be an asset to any facility he works for!

Sincerely,

*Tina Marrufo RN*

Tina Marrufo RN  
831-A University Street  
Healdsburg, CA 95448  
(574) 551-6156

LVMPD0056

PA3051

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8522 P.12

September 9, 2006

To Whom It May Concern:

Re: Letter of Recommendation

It gives me great pleasure to write this Letter of Recommendation for Mr. Steve Farmer, whom I have had the privilege of being his charge nurse for the last seven months at Healdsburg District Hospital Subacute unit.

Mr. Farmer has been an exceptional asset to our unit as a Certified Nursing Assistant, and has exhibited true leadership in his job. I have come to rely upon Mr. Farmer to be my eyes and ears with the patient's needs and families needs as well. Our Subacute unit is a very strenuous and emotional draining milieu, as we have many patient's who have suffered serious head traumas and are in a most vulnerable state of health.

Mr. Farmer has always been willing to assist the Registered Nurses and Licensed Vocational Nurses in a variety of tasks, within his scope of practice; he has been accountable, responsible, honest, trustworthy and dependable. His innate ability to prioritize his duties and manage his time on our unit has allowed for him to assist with training new C.N.A employees, and also nursing employees.

He is always willing to go that extra mile for the patient's, their families and staff. His work is impeccable, and he continues to provide safe, and compassionate care to our patient's, and uphold a manner of professionalism in all he does.

Mr. Farmer continues to seek new ways to better our environment and continues to remain teachable, in that he has enrolled in the telemetry classes offered here, so that he can expand his knowledge base.

I am saddened that we are losing such a valued member of our team, here at Healdsburg District Hospital. I know Mr. Farmer will be successful wherever he is employed and will be an asset to you and your company.

Sincerely,

  
Barbara McEneaney, LVN

P.O. Box 5671

Santa Rosa, CA 95402-5671

(707) 758-3197

LVMPD0057

PA3052

CONFIDENTIAL

MAY-16-2008 16:01

American Nurse Las Vegas

702 638 8622 P.28

Tsegai Haile, RN  
2039 Bedford street  
Santa Rosa, CA 95404, (707) 761-2996  
Email: tsegaihaile@comcast.net

05/24/2007

To whom it may concern:  
Dear Sir or Madam:

I worked alongside with Mr. Steve Farmer for the past 9 months at HDH, Healdsburg Dist. Hosp., Healdsburg CA as a Lead Nurse, I was the senior on-site administrator at the facility when I was on duty in addition to providing a direct patient care. As such I'm always into contact with Mr. Farmer who is our telemetry technician as well as our CNA.

As a Tele. tech. Steve is very responsible person and extremely efficient in running the department's affairs smoothly always working above and beyond call of duty. As a CNA Steve is very caring and compassionate to his patients, Super team player, Considerate and respectful to his peers. Steve is very energetic he always assumes his duties with interest and vigor. He is actually one of the best CNAs and Tele Techs I've ever worked with. Steve is a great asset to any employer and will make a great addition.

Best regards,

I am very truly yours



Tsegai Haile, RN

LVMPD0058

PA3053

CONFIDENTIAL

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8622 P.13

### Employment History

From: 08/2005 Telephone: 800 300-5616  
To: Present May we contact: Yes

Company: Unemployment

Address: P.O. Box 12631

City: San Diego

State: CA

Zip: 92112-0631

Supervisor: None

Title:

Your Title: Unemployed

Duties: Look For Work

Start Salary: 684.00 mo End Salary: 684.00 mo

Reason For Leaving: Currently collecting

From: 04/2005 Telephone: 707 577-7600  
To: 07/2005 May we contact: Yes

Company: CNA School American Red Cross

Address: 5297 Arco Drive

City: Santa Rosa

State: CA

Zip: 95403

Supervisor: Sally Sweeney

Title: Teacher

Your Title: Student

Duties: Student

Start Salary: 834.00 mo End Salary: 684.00

Reason For Leaving: Graduated

From: 12/2004 Telephone: 800 300-5616  
To: 04/2005 May we contact: Yes

Company: Unemployment

Address: P.O. Box 12631

City: San Diego

State: CA

Zip: 92112-0631

Supervisor: Kathy White

Title: Job-Link Counselor

Your Title: WIA Candidate

Duties: Research for Grant For School

Start Salary: 834.00 mo End Salary: 684.00 mo

Reason For Leaving: Went to school

From: 12/2001 Telephone: 707 996-7272  
To: 12/2004 May we contact: No

Company: In-Home Support Services

Address: 2280 Northpoint Parkway

City: Santa Rosa

State: CA

Zip: 95402-1949

Supervisor: Helen Farmer

Title: Patient

Your Title: Care Giver

Duties: Refer to resume Attached

Start Salary: 9.50 hr End Salary: 9.50

Reason For Leaving: Death

From: 05/2002 Telephone: 510 547-119  
To: 01/2003 May we contact: Yes

Company: Radio Shack

Address: 100 Throckmorton Street Ste 1900

City: Fort Worth

State: TX

Zip: 76102

Supervisor: Dorothy Lino-Casa

Title: Senior Manager

Your Title: Salesman/Manager

Duties: Make Schedules, Keep Records, Customer Service, Set Up Displays, Bank Deposits, Sales, Managerial Tasks, Attend Manager Meetings, Hold Sales Meetings, etc

Start Salary: Com/36,000 yr End Salary: 45,000 yr

Reason For Leaving: Mother Very Ill, Strokes, Diabetes

From: 01/1996 Telephone:  
To: 11/2001 May we contact: No

Company: Self Employed

Address: 2804 El Camino Real

City: San Diego

State: CA

Zip: 92008

Supervisor:

Title:

Your Title: Real Estate Salesman/Loan Officer

Duties: Generated Leads, Sold Real Estate, Originated Real Estate Loans, Customer Service, Computer Work, All Aspect of Real Estate Sales and Loan Origination

Start Salary: Com End Salary: Com

Reason For Leaving: Mother Very Ill, Moved To Sonoma, CA

P.08 707 638 8622

American Nurse Santa Rosa

2008-05-06 09:14

LVMPD0059

PA3054

**CONFIDENTIAL**

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8622 P.14

**Past Address**

| Dates |         | Address    | City                  | St         | ZIP      |
|-------|---------|------------|-----------------------|------------|----------|
| From  | 06/2004 | To Present | 1600 Cunningham Way   | Santa Rosa | CA 95403 |
| From  | 02/2004 | To 06/2004 | 145 1/2 Agua Caliente | Sonoma     | CA 95478 |
| From  | 08/2003 | To 02/2004 | 38 Creekside Court    | Willits    | CA 95490 |
| From  | 11/2002 | To 08/2003 | 83 Cavendish Road     | Sonoma     | CA 95478 |
| From  | 11/2001 | To 08/2001 | 145 1/2 Agua Caliente | Sonoma     | CA 95478 |
| From  | 1993    | To 11/2001 | 2804 El Camino Real   | San Diego  | CA 92008 |

**Educational History**

| Name                | High Location | Major   | Highest Grade Completed |
|---------------------|---------------|---------|-------------------------|
| Chaffey High School | Ontario, CA   | General | 12                      |

| Name                   | College Location     | Major    | Highest Grade Completed |
|------------------------|----------------------|----------|-------------------------|
| Chaffey Junior College | Rancho Cucamonga, CA | Business | 15 units                |

| Name               | Professional School Location | Major                     | Completed |
|--------------------|------------------------------|---------------------------|-----------|
| American Red Cross | Santa Rosa, CA               | Certified Nurse Assistant | 08/2005   |
| American Red Cross | Santa Rosa, CA               | Home Health Aid           | 08/2005   |
| American Red Cross | Santa Rosa, CA               | Acute Care                | 07/2005   |
| H & R Tax School   | Santa Rosa, CA               | Certified Tax Preparer    | 11/2004   |
| American Red Cross | Santa Rosa, CA               | CPR Instructor            | 11/2004   |

**Professional Licensure - Registration - Certification**

| Type                         | Number         | State | Issue Date | Expiration Date |
|------------------------------|----------------|-------|------------|-----------------|
| Nursing Assistant            | 00059300       | CA    | 08/09/2005 | 03/18/2008      |
| Home Health Aide             | 00188703       | CA    | 08/09/2005 | 03/18/2008      |
| Red Cross CPR Instructor     | Sonoma Chapter | CA    | 11/08/2004 | 11/08/2005      |
| CPRAED For The Pro - Rescuer | Sonoma Chapter | CA    | 02/28/2005 | 02/28/2005      |

**Professional References**

| Name              | Address        | Telephone    | Occupation                         | How Does This Person Know you |
|-------------------|----------------|--------------|------------------------------------|-------------------------------|
| Nancy Buti        | Sonoma, CA     | 707 838-9141 | Recreational Therapist             | I worked for her and friend   |
| Dorothy Liro-Casa | Vallejo, CA    | 510 547-1919 | District Manager for H & R Block   | I worked for her and friend   |
| Teresa Fredricka  | Santa Rosa, CA | 707 525-4457 | Site Manager Counsel for The Aging | I worked for her and friend   |
| Julie Carso       | Sonoma, CA     | 707 384-5835 | Department of Motor Vehicle        | She worked for me and friend  |

707 638 8622 P.07

American Nurse Santa Rosa

MAY-06-2007 08:14

LVMPD0060

PA3055

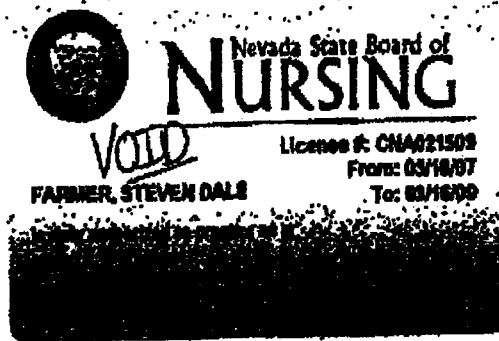


CONFIDENTIAL

MAY-16-2008 16:00

American Nurse Las Vegas

702 638 8522 P.16



NSBN WEB SITE

[www.nursingboard.state.nv.us](http://www.nursingboard.state.nv.us)

**LICENSEE**

You are required by law to only practice with a current active license. The law also requires you to inform the Board in writing of any address change.

**EMPLOYER**

Always verify current licensure status.

LVMPD0061

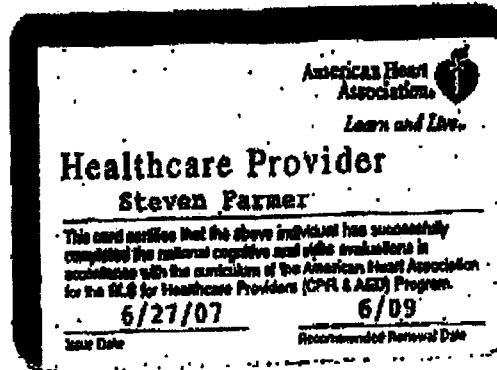
PA3056

CONFIDENTIAL

MAY-16-2008 16:01

American Nurse Las Vegas

702 638 8522 P.16



LVMPD0062

PA3057

CONFIDENTIAL

MAY-16-2008 16:01

American Nurse Las Vegas

702 638 8522 P.17

ANA WESTERN STATES AFFILIATE  
Region SUNRISE HOSPITAL & MED. CTR.  
Community SUNRISE CHILDRENS HOSPITAL  
Training Center LAS VEGAS, NV. 89105

Training Site LIFESAVERS C.P.R. 236-8094

Instructor LYNN PRESCOTT

Signature  
Stacy L. V. Farn

LVMPD0063

PA3058

CONFIDENTIAL

| JUN-JULY 08     | S | M | T | W | T | F | S | S | M | T | W | T | F | S | S | M | T | W | T | F | S |
|-----------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CLINICAL COOR.  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| CURLEE, DARBY   | C | C |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| AUGUSTO, AMY    |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 7P-7A RN FT     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| CIPOLLINI, SHER | B |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| FERNANDEZ, RO   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| SUMERA, RENAT   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| WOLFE, MARGA    |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| CHRISTENSEN, G  | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| DAVIS, KIMBERL  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| FERNANDEZ, YV   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| BRECK, SHANNO   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| STEVENS, DANIE  | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P |
| PAGAN, SANDRA   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| GOODHART, KAR   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| BROCK, JESSICA  | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I | I |
| PER DIEM RN'S   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| JONES, KAREN    |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| HIGHTOWER, TO   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| UC/TECH 7P      |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| MONTGOMERY, J   | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| PHILBIN, SHAWN  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| GOMEZ, J.J.     | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| DEGRE, AVA      | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B |
| 7P-7A RN'S      | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| 7P-7A UC/TECH   | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |

Find 5-22-08  
Add under

c = relief chg RN 7P-7A

! = (4) 12 7P-7A

e = education

p = PTO

c = charge RN 7P-7A  
> = G112 charge RN 7P-7A  
B = 7P-7A

Date: May 16, 2008

**CONFIDENTIAL**

Donna Lamonte/Mike McDonald  
Nevada Power Company  
Corporate Investigations  
Office phone (702) 227-2359  
FAX (702) 227-2008

In Response,  
Please Reply To:  
Inv. Ruth Gorski  
Sexual Assault Section  
(702) 828-5676/ FAX 828-3073

Greetings;

Our Department is conducting a criminal investigation involving the below listed person(s) and/ or address(es). Pursuant to NRS 704.201, we are requesting that you conduct a search of your customer records and provide us with the respective name of the customer and address, as applicable.

We request this inquiry be handled in a confidential manner and thank you for your cooperation.

**Name:** FARMER, STEVEN DALE

**DOB:** 03-16-1952

**Address:** UNKNOWN -REQUESTED

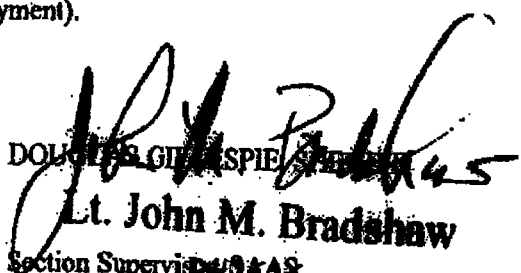
**Employment:** PLEASE ADVISE IF KNOWN

**Phone#:** UNKNOWN- PLEASE PROVIDE ANY YOU HAVE LISTED.

**Cut-In Date:** REQUESTED      **Cut-Out Date:** REQUESTED

**NOTE:** We are specifically looking for verification of ADDRESS, as well as contact phone numbers (home and/or employment).

Sincerely,

  
Lt. John M. Bradshaw  
Section Supervisor

By:

Please include complete address such as building number, apartment number, street, court, avenue, trail, road, etc.....If possible, check last known address in the other section.

LVMPD0065

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

**ADMINISTRATIVE SUBPOENA**

ISSUED PURSUANT TO NRS. 704.201

**CONFIDENTIAL**

THE LAS VEGAS METROPOLITAN POLICE DEPARTMENT

SENDS GREETINGS TO:

AMERICAN NURSING SERVICE ATTN: JOHNETTE SPELLMAN/HR DIR.

(INSERT NAME OF PUBLIC UTILITY)

**CUSTODIAN OF RECORDS**

FAX #: 504-210-2975

**YOU ARE HEREBY COMMANDED**, pursuant to the authority granted a law enforcement agency in Nevada Revised Statute 704.201, that all and singular business excuses being set aside, you produce:

- A true and accurate copy of your customer records, including the name(s), address(es), social security number(s) and  
I. date(s) of birth of the person(s) listed as the customer(s) for the following service address and/or phone number:

**SUBJECT: FARMER, STEVEN DALE, DOB/03-16-1952,**

- II. All records in your customer file pertaining to the following person(s):

The records shall be delivered on or before the 16<sup>TH</sup> day of MAY, 20 08, to the Las Vegas Metropolitan Police Department via fax #: 702-828-3073 to the attention of Det. I/S R. GORSKI (for SGT. PENCE).

☒ Check here if EMERGENCY REQUEST and is needed as soon as possible.

This subpoena is made to further a criminal/civil investigation being conducted by the Las Vegas Metropolitan Police Department.

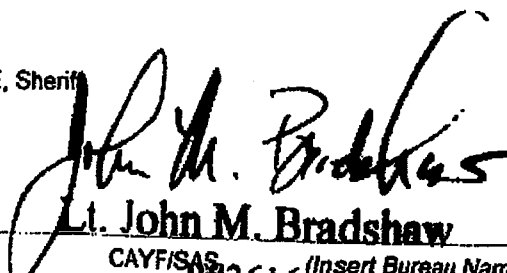
If you have any questions about this subpoena, contact: Det. SGT. PENCE at: 702-828-3421

Failure to produce these records may subject you to liability for contempt and for costs and fees expended in the enforcement of this subpoena. You are requested not to disclose the existence of this subpoena. Any such disclosure could obstruct and impede the investigation being conducted and thereby interfere with the enforcement of the law.

DATED this 16<sup>TH</sup> day of MAY, 20 08

DOUGLAS C. GILLESPIE, Sheriff

By:

  
Lt. John M. Bradshaw  
Bureau Commander, CAYF/SAS (Insert Bureau Name)  
Las Vegas Metropolitan Police Department

Expense to Cost Center: 5000155020

GL: 662300

LVMPD0066

## ARREST REPORT

CONFIDENTIAL

☐ City☒ County☒ Adult☐ Juvenile

Sector/Beat X6

|                                                                  |                                          |                             |              |                                                                                          |
|------------------------------------------------------------------|------------------------------------------|-----------------------------|--------------|------------------------------------------------------------------------------------------|
| ID/EVENT#                                                        | ARRESTEE'S NAME<br>(Last, First, Middle) |                             | S.S.#        |                                                                                          |
|                                                                  |                                          | Farmer, Steven Dale         |              |                                                                                          |
| ARRESTEE'S ADDRESS<br>(Number, Street, City, State, Zip Code)    |                                          |                             |              |                                                                                          |
|                                                                  |                                          | 1841 Leonard Las Vegas, NV. |              |                                                                                          |
| CHARGES:<br>Sexual Assault (3cts) / Open & Gross Lewdness (3cts) |                                          |                             |              |                                                                                          |
| OCCURRED:                                                        | DATE<br>5/16/08                          | DAY OF WEEK<br>Friday       | TIME<br>0445 | LOCATION OF ARREST (Number, Street, City, State, Zip Code)<br>1841 Leonard Las Vegas NV. |
| RACE<br>W                                                        | SEX<br>M                                 | D.O.B.<br>3/16/52           | HT<br>WT     | HAIR<br>EYES                                                                             |
|                                                                  |                                          |                             |              | PLACE OF BIRTH<br>CA.                                                                    |

## CIRCUMSTANCES OF ARREST

On May 16<sup>th</sup>, 2008, Detective M. Saunders P# 6076 and I, Sergeant M. Pence P# 4950 were contacted by patrol officers reference LVMPD Event # 080516-1021. According to details provided, a patient at Centennial Hills Hospital was reporting that she had been sexually assaulted by a male nurse who moved her from the Emergency Room to her assigned room at the hospital. Details also stated that the assault occurred in room 725. Detectives were advised that the LVMPD was contacted by the victim's husband identified as Scott Cagnina DOB 07/03/1968 who was still with the victim at the hospital.

Upon arrival, the victim was identified as Roxanne Cagnina DOB 07/06/1973. A taped interview was conducted with R. Cagnina. The following is a summary of that interview and is not verbatim. Cagnina stated she had been transported to the Emergency Room at Centennial Hills Hospital due to a seizure. While in the Emergency Room, Cagnina was given Phenyl barbitol and Ativan. Sometime around what Cagnina believed was 0300 hours, she was admitted to the hospital and was taken by Farmer (DOB: 3/16/52) up to her assigned room (#725) on the seventh floor. While in the elevator alone, Cagnina realized that Farmer put his hands under her blankets and was rubbing the top of her thigh and legs, moving his hands closer to her groin area. When Cagnina told Farmer to stop all he said was that he was just trying to relax her so she could go to sleep. Cagnina stated she then propped up her knees to get him to stop or to prevent him from touching her legs. When the elevator doors opened, Farmer stopped touching her and pushed her gurney in to room 725.

When they got in to the room, Farmer closed the door and moved Cagnina from the gurney to her bed. Cagnina said that Farmer began to rub her shoulders and when she told him "that's not necessary", Farmer said he was just trying to relax her and that she should be sleeping. Cagnina became fearful as Farmer again began to rub on her legs and thighs underneath her blanket, sheet and gown. Farmer told Cagnina that everything was okay, and that what he was doing to relax her was considered "procedure". Farmer began to rub her on her face and told her how beautiful she was. Farmer then put his hands underneath Cagnina's gown and began touching/fondling both of her breasts with his hands (Open & Gross Lewdness 1 count). Cagnina again told him to stop but Farmer continued to touch and feel on her breasts. Farmer then slid his hands under her gown and used his fingers to penetrate her vagina. (Sexual Assault 1 Count) Cagnina immediately told him to "stop", "Please stop", but Farmer told her to "just relax" and "this will help you go to sleep". Cagnina stated she then froze and did not know what to do. She stated Farmer was using both hands while penetrating her vagina multiple times (Sexual Assault 1 Count). Farmer told her to put her arms over her head and Cagnina complied because she was so afraid and scared. Farmer then went back to feeling and touching her breasts with his hands (Open & Gross Lewdness 1 count). Farmer again began to penetrate her vagina with his fingers (Sexual Assault 1 Count). Cagnina stated that she had her cellular phone under her pillow and while Farmer was touching her she attempted to use the camera to take pictures of what Farmer was doing. When she could hear the camera making noises, she stopped after a few attempts fearing that Farmer would hear the camera clicking. Farmer then moved the blankets aside and began to perform oral sex on Cagnina. Cagnina stated

|                      |      |             |                                         |
|----------------------|------|-------------|-----------------------------------------|
| ARRESTING OFFICER(S) | P#   | APPROVED BY | CONNECTING RPTS. (Type or Event Number) |
| M. Pence             | 4950 |             |                                         |
| C. JEX               | 5597 |             |                                         |

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
CONTINUATION REPORT

CONFIDENTIAL

ID/Event Number: 0

Page 2 of 2

that Farmer used his mouth and tongue on her vagina and she could feel his tongue inside of her (Sexual Assault 1 Count). During the entire assault, Farmer kept telling her that he was doing this to help her to relax. Farmer told Cagnina that he "had thick fingers" and that he wanted to make her "cum", because it would make her relax and go to sleep. Before leaving, Farmer told Cagnina that he would come back to check on her around 0700 to make sure she was okay. Cagnina stated that she fell asleep because of the medication she was on and woke up at approximately 0630, called her husband Scott Cagnina, vaguely told him what occurred and asked him to come to the hospital. Scott Cagnina told her to contact the Head Nurse and report the incident.

According to Cagnina, sometime around 0700, Farmer walked into her room while another nurse was there. When the other nurse asked Farmer why he was in the room, Farmer told the nurse that Cagnina was his patient in the Emergency Room and he was just checking on her. Before Farmer left, Cagnina stated that he gave her a threatening look and then walked out. She took his look as a threat to not say anything about what he had done to her. Cagnina then asked to talk to the Head Nurse to report what had happened. Cagnina also stated that she attempted to call 9-1-1, but hung up as the phone call connected because she was scared and didn't know what to say.

Cagnina gave permission for Detective Saunders to review her cell phone pictures and recent calls. Her cell phone showed two pictures being taken at approximately 0447 and 0450 hours on 05/16/07. Both pictures showed only a black screen. There was a 9-1-1 call showing at approximately 0754 hours on 05/16/08.

Detective Saunders made telephone contact with Nurse Goodall, who was working with Farmer in the Emergency Room and attending to Cagnina. Goodall said it seemed like Farmer was gone "quite a long time" when he transported Cagnina from the Emergency Room to room 725. Upon his return, Farmer told Goodall he had to help transfer Cagnina to her bed because of her condition and then he had to look for an IV stand.

A Sexual Assault examination was conducted by SANE Nurse L. Ebbert. According to Ebbert, Cagnina had three (3) crescent shape tears/lacerations between the 5-7 o'clock position of her vagina. These tears are consistent with the assault as described by Cagnina.

A photo line up was conducted with Cagnina. During this photo line-up, Cagnina positively identified Farmer as the nurse who sexually assaulted her. This was witnessed by both myself and Detective Saunders.

Cagnina described that during the incident, Farmer penetrated her vagina at least twice with his fingers and once with his mouth and tongue. Cagnina also described that Farmer touched and fondled her breasts at least twice and legs at least once during the 15 minutes that the assault lasted.

During the follow up investigation, detectives obtained Farmer's cell phone number. A Pen Register was obtained and signed by the Honorable Judge Alan Earl. The cell phone signal was located at 1841 Leonard. A knock and talk to conducted at that location and the homeowner, Raymond McCormick DOB: 6/08/37, answered the door. McCormick stated he rents a room to Farmer and allowed detectives inside his residence and directed them to Farmer's room. Contact was made with Farmer, who was sleeping in his bed. Farmer was arrested and transported to the detective bureau, located at 4750 W. Oakey. An interview was attempted with Farmer, who invoked his right to an attorney.

Due to the fact that Farmer did subject Cagnina to a sexual penetration with his hands, fingers, mouth and tongue, at least 3 times, against her will and without her consent, he was arrested for Sexual Assault (3 cts). Due to the fact Farmer rubbed and touched Cagnina's breasts and legs at least 3 times, against her will and without her consent, he was arrested for Open and Gross Lewdness (3 cts).

LVMPD0068

PA3063



## ARREST REPORT

CONFIDENTIAL

☐ City☒ County☒ Adult☐ Juvenile

Sector/Beat P1

|                                                                                                       |                                                                 |                      |                                                                                 |           |
|-------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------|-----------|
| ID/EVENT#<br>2679879                                                                                  | ARRESTEE'S NAME<br>(Last, First, Middle)<br>Farmer, Steven Dale |                      | S.S.#                                                                           |           |
| ARRESTEE'S ADDRESS<br>(Number, Street, City, State, Zip Code)<br>1841 Leonard Las Vegas, Nevada 89108 |                                                                 |                      |                                                                                 |           |
| CHARGES:<br>Open 7 Gross Lewdness                                                                     |                                                                 |                      |                                                                                 |           |
| OCURRED:<br>December<br>2007                                                                          | DAY OF WEEK                                                     | TIME<br>2200         | LOCATION OF ARREST (Number, Street, City, State, Zip Code)<br>CCDC / Re-Booking |           |
| RACE<br>W                                                                                             | SEX<br>M                                                        | D.O.B.<br>03/16/1952 | HT<br>5'10                                                                      | WT<br>200 |
| HAIR<br>White                                                                                         |                                                                 | EYES<br>Blue         | PLACE OF BIRTH<br>MO.                                                           |           |

## CIRCUMSTANCES OF ARREST

On 05/28/08, the victim identified as Frances Rose DOB 04/08/1964 contacted the LVMPD to identify herself as a person who had been victimized by the suspect Farmer. An interview with Rose was scheduled and completed to gather the information as described by Rose on 05/31/08.

During the interview said the following. That in December 2007, while she was a patient at Neal-Rawson Mental Health Facility she met the suspect Farmer who was employee of the facility. Sometime between the dates of December 25<sup>th</sup> and 27<sup>th</sup>, 2007, she had formed a friendship with him and that they would talk at night. One evening while talking, she reached to take a cup of coffee from Farmer. Farmer then grabbed her hand instead and placed it directly on top of his penis on the outside of his clothing. According to Rose, Farmer stated to her, "this is what you do to me", as he let go of her hand. Rose immediately pulled away and quickly left the area upset by what had just occurred. Rose stated that she could feel that Farmer had an erect penis under his clothing when he used her hand to touch himself. (Open & Gross Lewdness 1 Count) Rose stated that she did not report it because she felt that no one would believe her as she was in a mental health facility. Rose also said that she believed and feared that Farmer would deny the incident and try to get her in trouble or even extend how long she would have to stay, as she was due to be released within a few days. Rose then saw the news that Farmer had been arrested for other sexual related crimes. It was then she decided to contact the LVMPD.

Rose also stated that what she believed Farmer meant by his comment "this is what you do to me" was that he was inferring that she turns him on in a sexual way. She also said that the way Farmer touched her and made her touch him caused her to feel dirty and scared.

Due to the facts and circumstance, Farmer was then re-booked in to the Clark County Detention Center for 1 count of Open And Gross Lewdness on Rose.

|                      |      |                  |                                         |
|----------------------|------|------------------|-----------------------------------------|
| ARRESTING OFFICER(S) | P#   | APPROVED BY      | CONNECTING RPTS. (Type or Event Number) |
| M. Saunders          | 6076 | M. Pence P# 4950 |                                         |

LVMPD 602 (REV. 12-00) - AUTOMATED MWP12

LVMPD0069

## ARREST REPORT

CONFIDENTIAL

☐ City☒ County☒ Adult☐ Juvenile

Sector/Beat X5

|                                                                               |                                                               |                       |                       |                                                                          |
|-------------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------|-----------------------|--------------------------------------------------------------------------|
| ID/EVENT#<br>2679879                                                          | ARRESTEE'S NAME<br>(Last, First, Middle)<br>Farmer, Steven D. |                       | S.S.#                 |                                                                          |
| ARRESTEE'S ADDRESS<br>(Number, Street, City, State, Zip Code)<br>1841 Leonard |                                                               |                       |                       |                                                                          |
| CHARGES:<br>Open & Gross Lewdness / Indecent or Obscene Exposure              |                                                               |                       |                       |                                                                          |
| OCURRED:                                                                      | DATE<br>04/27/08                                              | DAY OF WEEK<br>Sunday | TIME<br>1900          | LOCATION OF ARREST (Number, Street, City, State, Zip Code)<br>Re-Booking |
| RACE<br>W                                                                     | SEX<br>M                                                      | D.O.B.<br>03/16/52    | HT<br>5'10            | WT<br>200                                                                |
| HAIR<br>White                                                                 |                                                               | EYES<br>Blue          | PLACE OF BIRTH<br>Mo. |                                                                          |

## CIRCUMSTANCES OF ARREST

That this detective was contacted by the victim identified as Ledahlia Spurlock DOB 01/04/73 who stated that she believes that she had been victimized by the suspect identified as Steven D. Farmer. On 05/31/08, a taped interview was conducted with Spurlock who stated the following.

Spurlock stated that on 04/27/08 she was a patient in the Emergency Room at Centennial Hills Hospital. While she was waiting to be transferred to another facility, she had two of her aunts with her in the room identified as Ernestine Smith DOB 03/25/36 and Ada Dotson DOB 07/23/37. At that time, a male nurse came who verbally identified himself as to them Steven Farmer. Spurlock went on to describe the suspect as a white male, 40's to 50's, white hair, and a neatly trimmed white beard and mustache. As Farmer entered, he approached the bottom edge of the bed as both Smith and Dotson were already standing on either side of Spurlock's bed. According to Spurlock, Farmer grabbed her feet as he stood there talking and began to pull them towards him, specifically his groin area. As she attempted to pull her feet away, Farmer held on tighter and continued to push his groin against the bottom of her feet as her pulled her feet towards him. Spurlock stated that this went on for several moments and that it made her very uncomfortable and scared. Spurlock attempted to pull her feet away from Farmer several times, but he continued to hold on to and pull her feet back to him and continued to push/pull her feet against his groin / penis. (Open & Gross Lewdness) She said that his behavior and actions was also witnessed by both of her aunts. After Farmer stopped and left they all three began to talk about what had just occurred. Spurlock then asked both Smith and Dotson to stay with her until she was transferred to the other facility as she was scared of what Farmer may do to her if she was left alone. She was now very concerned as Farmer was her nurse the previous evening when she was admitted. Spurlock said that she was on medications that made her sleep, and was now fearful that he may have done something else to her that she was unaware of. Spurlock said that she was unsure whether or not Farmer had an erection while he rubbed her feet against his penis/ groin area, but she felt his actions were sexual in nature for his gratification.

On 06/05/08, I contacted and conducted a taped interview Ernestine Smith at her residence. Ernestine said that on the evening of 04/27/08 while she was at Centennial Hills Hospital with her sister Dotson visiting her niece Spurlock who was in the E.R. waiting to be transferred to another facility. While they were all talking a white, male adult nurse came in Spurlock's room and identified himself as Steven Farmer. She gave the same description of the suspect as Spurlock.

While Farmer began talking to them, he approached the bottom of Spurlock's bed, and grabbed a hold of her feet and began pulling them towards him. This was immediately noticeable to Smith who continued to watch Farmer's actions with her niece Spurlock. Smith stated that as she watched, she could see Spurlock was visibly upset and trying to pull her feet away from Farmer and it appeared that he was rubbing her feet against his groin / penis area. Smith said that she could see that Farmer would physically pull Spurlock's feet back to

|                      |      |                  |                                         |
|----------------------|------|------------------|-----------------------------------------|
| ARRESTING OFFICER(S) | P#   | APPROVED BY      | CONNECTING RPTS. (Type or Event Number) |
| M. Saunders          | 6076 | M. Pence P# 4950 |                                         |

LVMPD 602 (REV. 12-90) - AUTOMATED/MF12

LVMPD0070

PA3065

## CONTINUATION REPORT

CONFIDENTIAL

ID/Event Number: 2679879

Page 2 of 2

him when she was able to briefly pull them away from Farmer. After several minutes, Farmer let go of Spurlock's feet and left the room. Smith stated that she believes Farmer didn't think that she, Dotson, or even Spurlock realized what he was doing, but that they all did see and observe the same actions of Farmer. Smith said that she was disgusted by Farmer's actions. After Farmer left, Spurlock asked both Smith and Dotson to stay with her because she was scared of Farmer and what he may do if he came back to her room.

On 06/05/08, I also contacted and conducted a taped interview with Ada Dotson at her residence. Dotson provided the same date, times and location as Smith did. Dotson also gave a very similar description of the incident as described by both Spurlock and Smith. Dotson stated it was very obvious to her of what Farmer was doing and that she could clearly see Farmer rubbing Spurlock's feet against his groin / penis area. (See transcripts for further)

Due to the facts and circumstances, Farmer was then re-booked into CCDC for another count of Open & Gross Lewdness for the rubbing of Spurlock's feet against his groin / penis for his sexual gratification as described by the victim Spurlock and both witnesses Smith and Dotson.

LVMPD0071

PA3066

**CONFIDENTIAL****ARREST REPORT**☐ City☒ County☒ Adult☐ JuvenileSector/Beat X5

|                                                                               |                                                               |                         |                       |                                                                          |
|-------------------------------------------------------------------------------|---------------------------------------------------------------|-------------------------|-----------------------|--------------------------------------------------------------------------|
| ID/EVENT#<br>2679878                                                          | ARRESTEE'S NAME<br>(Last, First, Middle)<br>Farmer, Steven D. |                         | S.S.#                 |                                                                          |
| ARRESTEE'S ADDRESS<br>(Number, Street, City, State, Zip Code)<br>1841 Leonard |                                                               |                         |                       |                                                                          |
| CHARGES:<br>Open & Gross Lewdness / Indecent or Obscene Exposure              |                                                               |                         |                       |                                                                          |
| OCURRED:                                                                      | DATE<br>05/15/08                                              | DAY OF WEEK<br>Thursday | TIME<br>1900          | LOCATION OF ARREST (Number, Street, City, State, Zip Code)<br>Re-Booking |
| RACE<br>W                                                                     | SEX<br>M                                                      | D.O.B.<br>03/16/52      | HT<br>5'10            | WT<br>200                                                                |
| HAIR<br>White                                                                 |                                                               | EYES<br>Blue            | PLACE OF BIRTH<br>Mo. |                                                                          |

**CIRCUMSTANCES OF ARREST**

Detectives were contacted by the PR Lehan who stated that he believed that his girlfriend Shank was also victimized by Farmer while she was a patient at Centennial Hills Hospital back on or about 05/16/08. Both Lehan and Shank gave taped statements providing the following information.

Shank stated that Farmer was transporting her on a gurney from the ER to her assigned room during the evening hours of 05/15/08. While in the elevator alone with Farmer, he made the comment that we should remove the electrodes because they will hurt more later if you wait to remove them. Without Shank consenting, Farmer open the front of her gown all the way down to her waistline exposing her bare breasts and immediately began to remove 2 electrodes, one at the top of each breast. After Farmer removed the first two electrodes, Shank realized that Farmer was now only staring at her exposed breasts and covered herself back up preventing Farmer from touching her further. Shank stated that she has had electrodes placed on and removed on her before at this same hospital and has never had a male nurse or any nurse attempt to remove the electrodes without another nurse or person present. She stated that in the past she herself removed the electrodes after being told to do so by her assigned nurse. Farmers actions made Shank very uncomfortable and she believes that Farmer exposed and touched her more for his personal pleasure than of any medical necessity. (Open & Gross 1 count)

Lehan stated that earlier in the evening on or about 05/15/08, he escorted Shank back to her bed in the ER. As she laid down, she immediately went back to sleep due to the medication that she was given. After assisting Shank on to the bed, Farmer entered the room and said that he would re-adjust the leads from the EKG machine because they were tangled in the sheets and Shanks' gown. Lehan who is familiar with EKG machines and patient medical practices, watched as Farmer opened Shanks gown exposing her bare breasts and body down to her waistline. Farmer then began to disconnect the leads attached to the electrodes and not from the machine. Lehan believing that this was improper for a male nurse to do, told Farmer to stop and Lehan covered up Shank with her gown. Lehan then re-attached the leads to the machine and not from the electrode pads as Farmer was trying to do. Lehan stated that he is a Radiological Technologist, and it is very common practice where a female patient is concerned to keep them covered as much as possible and untangle the leads from the machine itself, not from the electrodes that will expose the patient. When Lehan told Farmer that he will do it and covered up Shank, Farmer immediately left and did not returned to the room while Lehan was still there. Lehan believes that Farmer exposed Shank on purpose in order to see Shanks breasts. (Indecent /Obscene Exposure)

Photo line-ups were conducted separately with both Shank and Lehan. Both immediately and positively identified Steven Farmer as the suspect who committed these crimes against Shank.

|                      |      |                  |                                         |
|----------------------|------|------------------|-----------------------------------------|
| ARRESTING OFFICER(S) | P#   | APPROVED BY      | CONNECTING RPTS. (Type or Event Number) |
| M. Saunders          | 6076 | M. Pence P# 4950 |                                         |

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
CONTINUATION REPORT

**CONFIDENTIAL**

ID/Event Number: 2679879

Page 2 of 2

Farmer is the subject of several ongoing investigations. The facts involved as described by both Shank and Lehan were not known to the public, and are very similar to Farmers method of operandi involved in other crimes now being investigated.

Due to the facts and circumstances, Farmer was re-booked in to the CCDC for one count of Open & Gross lewdness for the exposure and touching of Shank's breasts while in the elevator alone with her, and one count of Indecent/Obscene exposure for purposefully exposing Shank's breasts as she lay sleeping while in the presence of Lehan.

LVMPD0073

PA3068

DATE: 5/17/2008  
TIME: 0018

**CONFIDENTIAL**

LVMPD DETENTION SERVICES DIVISION  
BOOKING VOUCHER

ID# 2679879  
\*\*\*\*\*

NAME: FARMER, STEVEN DALE

DOB: 03/16/1952

SEX: M RACE: W AGE: 56 HGT: 5'10" WGT: 200 HAIR: GRY EYES: BLU

POB: MO

AKA: FARMER, STEVEN D

RES ADDR: 1841 LEONARD LV, NV 89108  
\*\*\*\*\*

ARREST: 05/16/2008 2215 OFFICER: JEX, CRAIG C. P#: 5597  
BOOKING: 05/17/2008 0012 AGENCY: LAS VEGAS METRO POLICE

CHG CHARGE LITERAL

ENTERED  
SCOPE  
W9727L

COURT: JUSTICE COURT LV CASE#:

- 1 C05023 SEXUAL ASSAULT NRS: 200.366  
PCN#: 25053152 PCN SEQ: 001  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 10000.00 CIT/WARR:
- 2 C05023 SEXUAL ASSAULT NRS: 200.366  
PCN#: 25053152 PCN SEQ: 002  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 10000.00 CIT/WARR:
- 3 C05023 SEXUAL ASSAULT NRS: 200.366  
PCN#: 25053152 PCN SEQ: 003  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 10000.00 CIT/WARR:
- 4 C05108 OPEN AND GROSS LEWDNESS NRS: 201.2101A  
PCN#: 25053152 PCN SEQ: 004  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 5 C05108 OPEN AND GROSS LEWDNESS NRS: 201.2101A  
PCN#: 25053152 PCN SEQ: 005  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 6 C05108 OPEN AND GROSS LEWDNESS NRS: 201.2101A  
PCN#: 25053152 PCN SEQ: 006  
TYPE: PROBABLE CAUSE BAIL STAT: STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:

D13104S

LVMPD0074

PA3069

DATE: 7/12/2008  
TIME: 0833

CONFIDENTIAL

LVMPD DETENTION SERVICES DIVISION  
BOOKING VOUCHER

ID# 2679879

NAME: FARMER, STEVEN DALE

DOB: 03/16/1952

SEX: M RACE: W AGE: 56 HGT: 5'10" WGT: 200 HAIR: WHI EYES: BLU

POB: MO

AKA: FARMER, STEVEN D

RES ADDR: 1841 LEONARD LV, NV 89108

ARREST: 07/12/2008 0720 OFFICER: SAUNDERS, MICHAEL R P#: 6076  
BOOKING: 07/12/2008 0805 AGENCY: LAS VEGAS METRO POLICE

CHG CHARGE LITERAL

COURT: JUSTICE COURT LV CASE#: 08F13671X

- 1 C05023 SEXUAL ASSAULT NRS: 200.366  
PCN#: 27179313 PCN SEQ: 001  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 10000.00 CIT/WARR:  
*080615-71655*
- 2 C09810 OPEN AND GROSS LEWDNESS NRS: 201.2101B  
PCN#: 27179313 PCN SEQ: 005  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 3 C09810 OPEN AND GROSS LEWDNESS NRS: 201.2101B  
PCN#: 27179313 PCN SEQ: 004  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 4 C09810 OPEN AND GROSS LEWDNESS NRS: 201.2101B  
PCN#: 27179313 PCN SEQ: 002  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 5 C09810 OPEN AND GROSS LEWDNESS NRS: 201.2101B  
PCN#: 27179313 PCN SEQ: 003  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 6 C09810 OPEN AND GROSS LEWDNESS NRS: 201.2101B  
PCN#: 27179313 PCN SEQ: 008  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:
- 7 C05109 INDECENT OR OBSCENE EXPOSURE NRS: 201.2201A  
PCN#: 27179313 PCN SEQ: 007  
TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL  
EVENT: 0805161021 AMT: 1000.00 CIT/WARR:

REG NCIC



LVMPD0075

PA3070

**CONFIDENTIAL**

8 C05109 INDECENT OR OBSCENE EXPOSURE

NRS: 201.2201A

PCN#: 27179313 PCN SEQ: 006

TYPE: ARREST WARRANT BAIL STAT: NON-STANDARD BAIL

EVENT: 0805161021 AMT: 1000.00 CIT/WARR:

C8965R



LVMPD0076

PA3071



CONFIDENTIAL

DUPLICATE ORIGINAL SEARCH WARRANT

NRS 179.045

Copy

STATE OF NEVADA )  
 )  
 )

The State of Nevada, to any Peace Officer in the County of Clark. Proof having been made before me by  
Det. COOY By oral statement given under oath, incorporated herein by reference, that there  
is probable cause to believe that certain evidence, to wit:

1. BUCIAL SWAM
2. FINGER SWAM
3. FINGER SWAM

is presently located at: STEVE FARMER A. WHITE MALE ADULT DOB 3/14/50  
PRESENTLY LOCATED AT TSD 4750 W. OAKLEY

and as I am satisfied that there is probable cause to believe that said evidence is located as set forth above and based  
upon the statement of Det. COOY 7294 there are sufficient grounds for the issuance of the Search  
Warrant.

You are hereby commanded to search said premises/vehicle for said property, serving this warrant (At any  
hour of the day or night) (Between 7 am and 7 pm) and if the property is there to seize it and leave a written  
inventory and make a return before me within 10 (ten) days.

Dated this 16 day of MAY, 200 at 1030 o'clock P m.

(Print Judge's Name) WILLIAM V. JY

Signed by Detective COOY 7294 acting upon oral authorization of Judge V. JY

Witnessed by CHRYSTOPHER SEAT

ENDORSED this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

JUDGE

**RETURN****CONFIDENTIAL**

(Must be made within 10 days of issuance of Warrant)

The Search and Seizure Warrant authorizing a search and seizure at the following described location(s):

STEVEN FARMER D.O.B 3/16/52was executed on 5/16/08  
(month, day, year)A copy of this inventory was left with STEVEN FARMER D.O.B 3/16/52

(name of person or "at the place of search")

The following is an inventory of property taken pursuant to the warrant:

1. Buccal swabs
2. FINGER SWABS
3. FINGERPRINT CLIPPINGS

This inventory was made by: [Signature] 7224

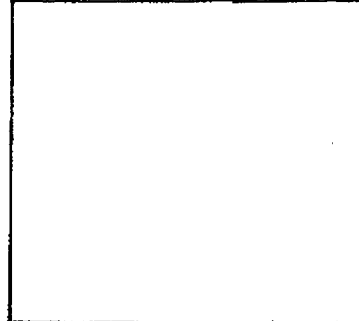
(at least two officers including affiant if present. If person from whom property is taken is present include that person.)

CONFIDENTIAL

Las Vegas Metro Prosecutor's Report Offense A of C

|                                                                                                                                                                                                                                                           |                                                                                          |                                                                                            |                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Citation #                                                                                                                                                                                                                                                |                                                                                          | E07277144605448A                                                                           |                                                                                            |
| Court Case #                                                                                                                                                                                                                                              | CLARK COUNTY REGIONAL MISDEMEANOR CITATION/COMPLAINT                                     | COURT                                                                                      |                                                                                            |
| STATE OF NEVADA                                                                                                                                                                                                                                           | Complainant/Accident                                                                     | <input checked="" type="checkbox"/> Adult                                                  | Event #                                                                                    |
|                                                                                                                                                                                                                                                           |                                                                                          | <input type="checkbox"/> Juvenile                                                          |                                                                                            |
| Las Vegas Municipal Court                                                                                                                                                                                                                                 |                                                                                          | ID #                                                                                       |                                                                                            |
| Traffic                                                                                                                                                                                                                                                   | Com Veh                                                                                  | Non-Traffic                                                                                | Accident Radar School 2 Const 2                                                            |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                       | <input type="checkbox"/>                                                                 | <input type="checkbox"/>                                                                   | <input type="checkbox"/>                                                                   |
| THE UNDERSIGNED CERTIFIES AND SAYS THAT IN THE STATE OF NEVADA                                                                                                                                                                                            |                                                                                          | Injured                                                                                    | Officer's Report                                                                           |
|                                                                                                                                                                                                                                                           |                                                                                          | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N                           | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N                           |
| Name (Last, First, Initial)                                                                                                                                                                                                                               |                                                                                          |                                                                                            |                                                                                            |
| FARMER, STEVEN                                                                                                                                                                                                                                            |                                                                                          |                                                                                            |                                                                                            |
| Res. Address                                                                                                                                                                                                                                              |                                                                                          | City                                                                                       | State Zip                                                                                  |
| 1831 LEONARD                                                                                                                                                                                                                                              |                                                                                          | Las Vegas                                                                                  | NV 89108                                                                                   |
| DOB                                                                                                                                                                                                                                                       | Height                                                                                   | Weight                                                                                     | Hair                                                                                       |
| 03/18/1952                                                                                                                                                                                                                                                | 5' 10"                                                                                   | 200                                                                                        | Grey                                                                                       |
| Driver License No.                                                                                                                                                                                                                                        | State                                                                                    | Class                                                                                      | Exp. Date                                                                                  |
| E0046991                                                                                                                                                                                                                                                  | CA                                                                                       | C                                                                                          | 03/18/09                                                                                   |
| VIOLATION DATE Month Day Year                                                                                                                                                                                                                             |                                                                                          | Time                                                                                       | DATE OF ISSUANCE Month Day Year                                                            |
| 10/04/2007                                                                                                                                                                                                                                                |                                                                                          | 14:48                                                                                      | 10/04/2007                                                                                 |
| At Location:                                                                                                                                                                                                                                              |                                                                                          | Name of Business (if Applicable)                                                           |                                                                                            |
| charleston West of arville                                                                                                                                                                                                                                |                                                                                          |                                                                                            |                                                                                            |
| DID OPERATE THE FOLLOWING VEHICLE/MOTOR VEHICLE ON A PUBLIC HIGHWAY AND                                                                                                                                                                                   |                                                                                          |                                                                                            |                                                                                            |
| Vehicle No.                                                                                                                                                                                                                                               | Year                                                                                     | Month                                                                                      | State                                                                                      |
| SPOC506                                                                                                                                                                                                                                                   | 06                                                                                       | 06                                                                                         | CA                                                                                         |
| Reg. Owner's Name                                                                                                                                                                                                                                         | Address                                                                                  |                                                                                            |                                                                                            |
| FARMER, STEVEN                                                                                                                                                                                                                                            | 1831 LEONARD                                                                             |                                                                                            |                                                                                            |
| DID THEN AND THERE COMMIT EACH OF THE FOLLOWING OFFENSES/INFRACTIONS                                                                                                                                                                                      |                                                                                          |                                                                                            |                                                                                            |
| Violation                                                                                                                                                                                                                                                 | State NRS                                                                                | City Ord                                                                                   | County Code                                                                                |
| 00103                                                                                                                                                                                                                                                     | NRS-482.545(1)                                                                           | LVO-10.02.010                                                                              | CCO-1.08.010                                                                               |
| Title Expired license plates                                                                                                                                                                                                                              |                                                                                          |                                                                                            |                                                                                            |
| To Wh exp 6/06                                                                                                                                                                                                                                            |                                                                                          |                                                                                            |                                                                                            |
|                                                                                                                                                                                                                                                           |                                                                                          |                                                                                            | Bail Amount                                                                                |
| I certify (or declare) under penalty of perjury under the laws of the state of Nevada that I have reasonable grounds/probable cause to believe and do believe the above named person committed the above infraction(s) and/or offense(s) contrary to law. |                                                                                          |                                                                                            |                                                                                            |
| Officer/Complainant's PRINTED Name                                                                                                                                                                                                                        | Officer/Complainant's Signature                                                          | P No                                                                                       | Bureau                                                                                     |
| Laythorpe, Michael                                                                                                                                                                                                                                        |                                                                                          | 5448                                                                                       | LVMPD                                                                                      |
| Las Vegas Justice Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89155-6711<br>3444 877-6711<br>3183                                                                                                                                                          | Henderson Municipal Court<br>243 Water St<br>Henderson, NV<br>89015-267<br>3300          | Family Youth Services<br>Building 5, 601<br>N Pease Rd.<br>Las Vegas, NV<br>89101-455-5200 | Las Vegas Municipal Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89101-382-6878 800-654-6856 |
| NLV Township Justice Court 2428 Martin Luther King Blvd, North                                                                                                                                                                                            | N Las Vegas Municipal Court<br>2240 Civic Center Dr N,<br>Las Vegas NV<br>89030-633-1130 | Laughlin Justice Court<br>101 Civic Way<br>Suite 2,<br>Laughlin, NV<br>89029-258-4622      |                                                                                            |
| Jurisdiction Las Vegas Municipal Court                                                                                                                                                                                                                    |                                                                                          |                                                                                            |                                                                                            |
| You are hereby ordered to appear on the 1 day of November year 2007 at OR <input checked="" type="checkbox"/> Regular Business Hours                                                                                                                      |                                                                                          |                                                                                            |                                                                                            |
| Without admitting having committed each of the above infractions/offenses, I hereby promise to respond as described on this notice and waive my right to be taken immediately before a magistrate                                                         |                                                                                          |                                                                                            |                                                                                            |
| Defendant's Signature                                                                                                                                                                                                                                     |                                                                                          | <input type="checkbox"/> Interpreter Needed                                                | LANGUAGE                                                                                   |
| FRP, §-01 1v1000 Failure to comply with this complaint or future dates relating to this complaint will constitute a separate offense.                                                                                                                     |                                                                                          |                                                                                            |                                                                                            |

Scene Diagram



NOTICE: Any charges listed on this citation prosecuted in Las Vegas Municipal Court will be severed into separate individual cases before filing with the Court

Reason for Stop:  
Traffic Stop

Officer Signature



LVMPD0079

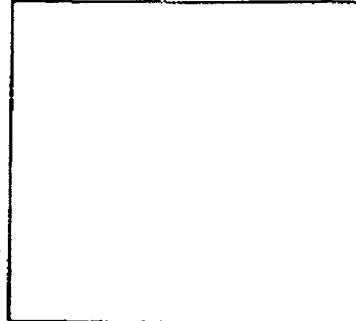
PA3074

CONFIDENTIAL

Las Vegas Metro Prosecutor's Report Offense B of C

|                                                                                                                                                                                                                                                           |                                                                                          |                                                                                            |                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Citation #                                                                                                                                                                                                                                                |                                                                                          | E07277144605448B                                                                           |                                                                                            |
| Court Case #                                                                                                                                                                                                                                              | CLARK COUNTY REGIONAL MISDEMEANOR CITATION/COMPLAINT                                     |                                                                                            | COURT                                                                                      |
| STATE OF NEVADA                                                                                                                                                                                                                                           | Complaint/Accident                                                                       | <input checked="" type="checkbox"/> Adult<br><input type="checkbox"/> Juvenile             | Event #                                                                                    |
| Las Vegas Municipal Court                                                                                                                                                                                                                                 |                                                                                          | ID #                                                                                       |                                                                                            |
| Traffic                                                                                                                                                                                                                                                   | Com Veh                                                                                  | Non-Traffic                                                                                | Accident Report                                                                            |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                       | <input type="checkbox"/>                                                                 | <input type="checkbox"/>                                                                   | <input type="checkbox"/>                                                                   |
| THE UNDERSIGNED CERTIFIES AND SAYS THAT IN THE STATE OF NEVADA                                                                                                                                                                                            |                                                                                          | Injuries                                                                                   |                                                                                            |
|                                                                                                                                                                                                                                                           |                                                                                          | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N                           |                                                                                            |
| Name (Last, First, Initial)                                                                                                                                                                                                                               |                                                                                          | Officer's Report                                                                           |                                                                                            |
| FARMER, STEVEN                                                                                                                                                                                                                                            |                                                                                          | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N                           |                                                                                            |
| Res. Address                                                                                                                                                                                                                                              |                                                                                          | Crime Report                                                                               |                                                                                            |
| 1831 LEONARD                                                                                                                                                                                                                                              |                                                                                          | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N                           |                                                                                            |
| DOB                                                                                                                                                                                                                                                       | City                                                                                     | State                                                                                      | Zip                                                                                        |
| 03/16/1952                                                                                                                                                                                                                                                | Las Vegas                                                                                | NV                                                                                         | 89108                                                                                      |
| Driver License No                                                                                                                                                                                                                                         | Class                                                                                    | Exp. Date                                                                                  | Restrictions                                                                               |
| E0046991                                                                                                                                                                                                                                                  | C                                                                                        | 03/16/09                                                                                   |                                                                                            |
| VIOLATION DATE                                                                                                                                                                                                                                            | Month                                                                                    | Day                                                                                        | Year                                                                                       |
| 10/04/2007                                                                                                                                                                                                                                                |                                                                                          |                                                                                            |                                                                                            |
| Time                                                                                                                                                                                                                                                      | DATE OF ISSUANCE                                                                         |                                                                                            |                                                                                            |
| 14:48                                                                                                                                                                                                                                                     | 10/04/2007                                                                               |                                                                                            |                                                                                            |
| At Location                                                                                                                                                                                                                                               | Name of Business (If Applicable)                                                         |                                                                                            |                                                                                            |
| Charleston West of Arville                                                                                                                                                                                                                                |                                                                                          |                                                                                            |                                                                                            |
| DID OPERATE THE FOLLOWING VEHICLE/MOTOR VEHICLE ON A PUBLIC HIGHWAY AND                                                                                                                                                                                   |                                                                                          |                                                                                            |                                                                                            |
| Vehicle No.                                                                                                                                                                                                                                               | Year                                                                                     | Month                                                                                      | State                                                                                      |
| 5PQC506                                                                                                                                                                                                                                                   | 06                                                                                       | 06                                                                                         | CA                                                                                         |
| Reg. Owner's Name                                                                                                                                                                                                                                         | Veh. Yr.                                                                                 | Make                                                                                       | Body Type                                                                                  |
| FARMER, STEVEN                                                                                                                                                                                                                                            | 1999                                                                                     | Pontiac                                                                                    | 2D                                                                                         |
| Address                                                                                                                                                                                                                                                   | Color(s)                                                                                 |                                                                                            |                                                                                            |
| 1831 LEONARD                                                                                                                                                                                                                                              | Blue                                                                                     |                                                                                            |                                                                                            |
| DID THEN AND THERE COMMIT EACH OF THE FOLLOWING OFFENSES/INFRACTIONS                                                                                                                                                                                      |                                                                                          |                                                                                            |                                                                                            |
| Violation                                                                                                                                                                                                                                                 | State NRS                                                                                | City Ord                                                                                   | County Code                                                                                |
| 00111                                                                                                                                                                                                                                                     | NRS-485.187                                                                              | LVO-10.02.010                                                                              | CCO-1.08.010                                                                               |
| Title                                                                                                                                                                                                                                                     | No proof of insurance in vehicle                                                         |                                                                                            |                                                                                            |
| To Wh                                                                                                                                                                                                                                                     |                                                                                          |                                                                                            |                                                                                            |
| Bel Amount                                                                                                                                                                                                                                                |                                                                                          |                                                                                            |                                                                                            |
| I certify (or declare) under penalty of perjury under the laws of the state of Nevada that I have reasonable grounds/probable cause to believe and do believe the above named person committed the above infraction(s) and/or offense(s) contrary to law. |                                                                                          |                                                                                            |                                                                                            |
| Officer/Complainant's PRINTED Name                                                                                                                                                                                                                        | Officer/Complainant's Signature                                                          | P No                                                                                       | Bureau                                                                                     |
| Laythorpe, Michael                                                                                                                                                                                                                                        |                                                                                          | 5448                                                                                       | LVMPD                                                                                      |
| Las Vegas Justice Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89155-6711<br>3444 877-671-3183                                                                                                                                                              | Henderson Municipal Court<br>243 Water St<br>Henderson, NV<br>89015 267 3300             | Family Youth Services<br>Building 5, 601<br>N Paces Rd.<br>Las Vegas, NV<br>89181 455-5200 | Las Vegas Municipal Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89101 382-8878 800-654-6856 |
| Las Vegas Township Justice Court<br>2428 Martin Luther King Blvd, North                                                                                                                                                                                   | N Las Vegas Municipal Court<br>2240 Civic Center Dr N.<br>Las Vegas NV<br>89030 633-1139 | Laughlin Justice Court<br>101 Civic Way<br>Suite 2,<br>Laughlin, NV<br>89020 298-4822      |                                                                                            |
| Jurisdiction Las Vegas Municipal Court                                                                                                                                                                                                                    |                                                                                          |                                                                                            |                                                                                            |
| You are hereby ordered to appear on the 1 day of November year 2007 at                                                                                                                                                                                    |                                                                                          |                                                                                            |                                                                                            |
| to answer the above charges                                                                                                                                                                                                                               |                                                                                          |                                                                                            |                                                                                            |
| Without admitting having committed each of the above infractions/offenses, I hereby promise to respond as described on this notice and waive my right to be taken immediately before a magistrate                                                         |                                                                                          |                                                                                            |                                                                                            |
| Total Bel Amount                                                                                                                                                                                                                                          |                                                                                          |                                                                                            |                                                                                            |
| Defendant's Signature                                                                                                                                                                                                                                     |                                                                                          |                                                                                            |                                                                                            |
| <input type="checkbox"/> Interpreter Needed LANGUAGE                                                                                                                                                                                                      |                                                                                          |                                                                                            |                                                                                            |
| FRP. 5-01 1v1000 Failure to comply with this complaint or future dates relating to this complaint will constitute a separate offense.                                                                                                                     |                                                                                          |                                                                                            |                                                                                            |

Scene Diagram



NOTICE: Any charges listed on this citation prosecuted in Las Vegas Municipal Court will be severed into separate individual cases before filing with the Court

Reason for Stop:  
Traffic Stop

Officer Signature



LVMPD0080

PA3075

**CONFIDENTIAL**

**Las Vegas Metro Prosecutor's Report** Offense C of C

|                                                                                                                                                                                                                                                           |                                                                                            |                                                                                           |                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Citation #                                                                                                                                                                                                                                                |                                                                                            | E07277144605448C                                                                          |                                                                                            |
| Court Case #                                                                                                                                                                                                                                              | CLARK COUNTY REGIONAL MISDEMEANOR CITATION/COMPLAINT                                       |                                                                                           | COURT                                                                                      |
| STATE OF NEVADA                                                                                                                                                                                                                                           | Complaint/Accident                                                                         | <input checked="" type="checkbox"/> Adult<br><input type="checkbox"/> Juvenile            | Event #                                                                                    |
| Las Vegas Municipal Court                                                                                                                                                                                                                                 |                                                                                            | IO #                                                                                      |                                                                                            |
| Traffic                                                                                                                                                                                                                                                   | Com/Veh                                                                                    | Non-Traffic                                                                               | Accident/Radar School 2 Const 2                                                            |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                       | <input type="checkbox"/>                                                                   | <input type="checkbox"/>                                                                  | <input type="checkbox"/>                                                                   |
| THE UNDERSIGNED CERTIFIES AND SAYS THAT IN THE STATE OF NEVADA                                                                                                                                                                                            |                                                                                            |                                                                                           |                                                                                            |
| Name (Last, First, Initial)<br>FARMER, STEVEN                                                                                                                                                                                                             |                                                                                            |                                                                                           |                                                                                            |
| Res. Address<br>1831 LEONARD                                                                                                                                                                                                                              |                                                                                            | City<br>Las Vegas                                                                         | State<br>NV Zip<br>89108                                                                   |
| DOB<br>03/16/1952                                                                                                                                                                                                                                         | Orig<br>W                                                                                  | Sex<br>M                                                                                  | Ht<br>5' 10"                                                                               |
| Wt<br>200                                                                                                                                                                                                                                                 | Hair<br>Grey                                                                               | Eyes<br>BLU                                                                               | S.S. No                                                                                    |
| Driver's License No<br>E0046991                                                                                                                                                                                                                           | State<br>CA                                                                                | Class<br>C                                                                                | Exp. Date<br>03/16/09                                                                      |
| VIOLATION DATE Month Day Year<br>10/04/2007                                                                                                                                                                                                               | Time<br>14:48                                                                              | DATE OF ASSUANCE Month Day Year<br>10/04/2007                                             | Restrictions                                                                               |
| At Location<br>charleston West of arville                                                                                                                                                                                                                 |                                                                                            |                                                                                           |                                                                                            |
| Name of Business (If Applicable)                                                                                                                                                                                                                          |                                                                                            |                                                                                           |                                                                                            |
| DO OPERATE THE FOLLOWING VEHICLE/MOTOR VEHICLE ON A PUBLIC HIGHWAY AND                                                                                                                                                                                    |                                                                                            |                                                                                           |                                                                                            |
| Vehicle No.<br>5PQC506                                                                                                                                                                                                                                    | Year<br>06                                                                                 | Month<br>06                                                                               | State<br>CA                                                                                |
| Veh. Yr.<br>1999                                                                                                                                                                                                                                          | Make<br>Pontiac                                                                            | Body Type<br>2D                                                                           | Color(s)<br>Blue                                                                           |
| Reg. Owner's Name<br>FARMER, STEVEN                                                                                                                                                                                                                       |                                                                                            | Address<br>1831 LEONARD                                                                   |                                                                                            |
| DO THEN AND THERE COMMIT EACH OF THE FOLLOWING OFFENSES/INFRACTIONS                                                                                                                                                                                       |                                                                                            |                                                                                           |                                                                                            |
| Violation<br>00200                                                                                                                                                                                                                                        | State NRS<br>NRS-483.550(1)                                                                | City Ord<br>LVO-10.02.010                                                                 | County Code<br>CCO-1.08.010                                                                |
| Title<br>No Drivers License - Every person in control must be licensed.                                                                                                                                                                                   |                                                                                            |                                                                                           |                                                                                            |
| To Wh<br>no record ca/nv                                                                                                                                                                                                                                  |                                                                                            |                                                                                           |                                                                                            |
| I certify (or declare) under penalty of perjury under the laws of the state of Nevada that I have reasonable grounds/probable cause to believe and do believe the above named person committed the above infraction(s) and/or offense(s) contrary to law. |                                                                                            |                                                                                           |                                                                                            |
| Officer/Complainant's PRINTED Name<br>Laythorpe, Michael                                                                                                                                                                                                  |                                                                                            | Officer/Complainant's Signature                                                           |                                                                                            |
| P No<br>5448                                                                                                                                                                                                                                              |                                                                                            | Bureau<br>LVMPD                                                                           |                                                                                            |
| Las Vegas Justice Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89155-4711-3444 877-571-3183                                                                                                                                                                 | Henderson Municipal Court<br>243 Water St<br>Henderson, NV<br>89015-2673300                | Family Youth Services<br>Building S, 601<br>N Pecos Rd.<br>Las Vegas, NV<br>89101-4555200 | Las Vegas Municipal Court<br>200 Lewis Ave<br>Las Vegas, NV<br>89101-382-6878 800-634-6866 |
| MLV Township Justice Court<br>2428 Martin Luther King Blvd, North<br>1130                                                                                                                                                                                 | MLV Las Vegas Municipal Court<br>2240 Civic Center Dr N.<br>Las Vegas NV<br>89030-633-1130 | Laughlin Justice Court<br>101 Civic Way<br>Suite 2,<br>Laughlin, NV<br>89028-298-4622     |                                                                                            |
| Jurisdiction Las Vegas Municipal Court                                                                                                                                                                                                                    |                                                                                            |                                                                                           |                                                                                            |
| You are hereby ordered to appear on the 1 day of November year 2007 at OR <input checked="" type="checkbox"/> Regular Business Hours                                                                                                                      |                                                                                            |                                                                                           |                                                                                            |
| Without admitting having committed each of the above infractions/offenses, I hereby promise to respond as described on this notice and waive my right to be taken immediately before a magistrate                                                         |                                                                                            |                                                                                           |                                                                                            |
| Total Bail Amount                                                                                                                                                                                                                                         |                                                                                            |                                                                                           |                                                                                            |
| Defendant's Signature                                                                                                                                                                                                                                     |                                                                                            | <input type="checkbox"/> Interpreter Needed LANGUAGE                                      |                                                                                            |
| FRP, 5-01 1v1000 Failure to comply with this complaint or future dates relating to this complaint will constitute a separate offense.                                                                                                                     |                                                                                            |                                                                                           |                                                                                            |

**Scene Diagram**

NOTICE: Any charges listed on this citation prosecuted in Las Vegas Municipal Court will be severed into separate individual cases before filing with the Court

Reason for Stop:  
Traffic Stop

**Officer Signature**

LVMPD0081

PA3076

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
DECLARATION OF ARREST

**CONFIDENTIAL**

ID#: \_\_\_\_\_

EVENT: 080516-1021

|                                         |                                   |                                |
|-----------------------------------------|-----------------------------------|--------------------------------|
| TRUE NAME:<br><b>STEVEN DALE FARMER</b> | DATE OF ARREST:<br><b>5/16/08</b> | TIME OF ARREST:<br><b>2215</b> |
|-----------------------------------------|-----------------------------------|--------------------------------|

|                                              |
|----------------------------------------------|
| OTHER CHARGES RECOMMENDED FOR CONSIDERATION: |
|----------------------------------------------|

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of 13 years.

That I learned the following facts and circumstances which lead me to believe that STEVEN DALE FARMER committed (or was committing) the offense of Sexual Assault (3 cts) and Open & Gross Lewdness (3 cts) at the location of 6900 N. Durango #725, Las Vegas, NV. 89149.

That the offense occurred at approximately 0445 hours on the 16th day of May, 2008.

On May 16<sup>th</sup>, 2008, Detective M. Saunders P# 6076 and I, Sergeant M. Pence P# 4950 were contacted by patrol officers reference LVMPD Event # 080516-1021. According to details provided, a patient at Centennial Hills Hospital was reporting that she had been sexually assaulted by a male nurse who moved her from the Emergency Room to her assigned room at the hospital. Details also stated that the assault occurred in room 725. Detectives were advised that the LVMPD was contacted by the victim's husband identified as Scott Cagnina DOB 07/03/1968 who was still with the victim at the hospital.

Upon arrival, the victim was identified as Roxanne Cagnina DOB 07/06/1973. A taped interview was conducted with R. Cagnina. The following is a summary of that interview and is not verbatim. Cagnina stated she had been transported to the Emergency Room at Centennial Hills Hospital due to a seizure. While in the Emergency Room, Cagnina was given Phenyl barbitol and Ativan. Sometime around what Cagnina believed was 0300 hours, she was admitted to the hospital and was taken by Farmer (DOB: 3/16/52) up to her assigned room (#725) on the seventh floor. While in the elevator alone, Cagnina realized that Farmer put his hands under her blankets and was rubbing the top of her thigh and legs, moving his hands closer to her groin area. When Cagnina told Farmer to stop all he said was that he was just trying to relax her so she could go to sleep. Cagnina stated she then propped up her knees to get him to stop or to prevent him from touching her legs. When the elevator doors opened, Farmer stopped touching her and pushed her gurney in to room 725.

When they got in to the room, Farmer closed the door and moved Cagnina from the gurney to her bed. Cagnina said that Farmer began to rub her shoulders and when she told him "that's not necessary", Farmer said he was just trying to relax her and that she should be sleeping. Cagnina became fearful as Farmer again began to rub on her legs and thighs underneath her blanket, sheet and gown. Farmer told Cagnina that everything was okay, and that what he was doing to relax her was considered "procedure". Farmer began to rub her on her face and told her how beautiful she was. Farmer then put his hands underneath Cagnina's gown and began touching/fondling both of

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
DECLARATION OF ARREST CONTINUATION  
Page 2

**CONFIDENTIAL**

ID#: \_\_\_\_\_

EVENT: 080516-1021

her breasts with his hands (Open & Gross Lewdness 1 count). Cagnina again told him to stop but Farmer continued to touch and feel on her breasts. Farmer then slid his hands under her gown and used his fingers to penetrate her vagina. (Sexual Assault 1 Count) Cagnina immediately told him to "stop", "Please stop", but Farmer told her to "just relax" and "this will help you go to sleep". Cagnina stated she then froze and did not know what to do. She stated Farmer was using both hands while penetrating her vagina multiple times (Sexual Assault 1 Count). Farmer told her to put her arms over her head and Cagnina complied because she was so afraid and scared. Farmer then went back to feeling and touching her breasts with his hands (Open & Gross Lewdness 1 count). Farmer again began to penetrate her vagina with his fingers (Sexual Assault 1 Count). Cagnina stated that she had her cellular phone under her pillow and while Farmer was touching her she attempted to use the camera to take pictures of what Farmer was doing. When she could hear the camera making noises, she stopped after a few attempts fearing that Farmer would hear the camera clicking. Farmer then moved the blankets aside and began to perform oral sex on Cagnina. Cagnina stated that Farmer used his mouth and tongue on her vagina and she could feel his tongue inside of her (Sexual Assault 1 Count). During the entire assault, Farmer kept telling her that he was doing this to help her to relax. Farmer told Cagnina that he "had thick fingers" and that he wanted to make her "cum", because it would make her relax and go to sleep. Before leaving, Farmer told Cagnina that he would come back to check on her around 0700 to make sure she was okay. Cagnina stated that she fell asleep because of the medication she was on and woke up at approximately 0630, called her husband Scott Cagnina, vaguely told him what occurred and asked him to come to the hospital. Scott Cagnina told her to contact the Head Nurse and report the incident.

According to Cagnina, sometime around 0700, Farmer walked into her room while another nurse was there. When the other nurse asked Farmer why he was in the room, Farmer told the nurse that Cagnina was his patient in the Emergency Room and he was just checking on her. Before Farmer left, Cagnina stated that he gave her a threatening look and then walked out. She took his look as a threat to not say anything about what he had done to her. Cagnina then asked to talk to the Head Nurse to report what had happened. Cagnina also stated that she attempted to call 9-1-1, but hung up as the phone call connected because she was scared and didn't know what to say.

Cagnina gave permission for Detective Saunders to review her cell phone pictures and recent calls. Her cell phone showed two pictures being taken at approximately 0447 and 0450 hours on 05/16/07. Both pictures showed only a black screen. There was a 9-1-1 call showing at approximately 0754 hours on 05/16/08.

Detective Saunders made telephone contact with Nurse Goodall, who was working with Farmer in the Emergency Room and attending to Cagnina. Goodall said it seemed like Farmer was gone "quite a long time" when he transported Cagnina from the Emergency Room to room 725. Upon his return, Farmer told Goodall he had to help transfer Cagnina to her bed because of her condition and then he had to look for an IV stand.

A Sexual Assault examination was conducted by SANE Nurse L. Ebbert. According to Ebbert, Cagnina had three (3) crescent shape tears/lacerations between the 5-7 o'clock position of her vagina. These tears are consistent with the assault as described by Cagnina.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
DECLARATION OF ARREST CONTINUATION  
Page 3

**CONFIDENTIAL**

ID#: \_\_\_\_\_

EVENT: 080516-1021

A photo line up was conducted with Cagnina. During this photo line-up, Cagnina positively identified Farmer as the nurse who sexually assaulted her. This was witnessed by both myself and Detective Saunders.

Cagnina described that during the incident, Farmer penetrated her vagina at least twice with his fingers and and once with his mouth and tongue. Cagnina also described that Farmer touched and fondled her breasts at least twice and legs at least once during the 15 minutes that the assault lasted.

During the follow up investigation, detectives obtained Farmer's cell phone number. A Pen Register was obtained and signed by the Honorable Judge Alan Earl. The cell phone signal was located at 1841 Leonard. A knock and talk to conducted at that location and the homeowner, Raymond McCormick DOB: 6/08/37, answered the door. McCormick stated he rents a room to Farmer and allowed detectives inside his residence and directed them to Farmer's room. Contact was made with Farmer, who was sleeping in his bed. Farmer was arrested and transported to the detective bureau, located at 4750 W. Oakey. An interview was attempted with Farmer, who invoked his right to an attorney.

Due to the fact that Farmer did subject Cagnina to a sexual penetration with his hands, fingers, mouth and tongue, at least 3 times, against her will and without her consent, he was arrested for Sexual Assault (3 cts). Due to the fact Farmer rubbed and touched Cagnina's breasts and legs at least 3 times, against her will and without her consent, he was arrested for Open and Gross Lewdness (3 cts).

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Declarant

M. Pence 4950  
MISTY PENCE



CONFIDENTIAL

Operator this is Det. C. Jex, PH5597. I will be conducting one  
interview reference event # 080516-1021

The location of the interview is 4750 W. OAKEN

DLE

The person being interviewed is STEVEN FRANCE

DOB 3-16-52

Address 1841 LEONARD LUNN 89108

Phone # 702-332-5894

Also Present is Det. SGT. M. PENCE 4950

Today's Date 5-16-08 Start time 2205

End Time 2209

INVOKED MIRANDA

NO QUESTIONS

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
EVIDENCE IMPOUND REPORT

CONFIDENTIAL

EVIDENCE ☒FOUND PROPERTY ☐SAFEKEEPING ☐

EVENT #: 080516-1021

INCIDENT: SEXUAL ASSAULT

DATE: 5-16-08

LOCATION: 4750 W. OAKLEY BLVD.

Victim #1: ROXANNE CAGNINA (7-6-73)

Victim #2:

EVIDENCE

LOCATION RECOVERED

## PACKAGE 8177-1

ITEM #1 - Two (2) finger swabs - right hand.

From the right hand of Steven Farmer (DOB 3-16-52).

ITEM #2 - Two (2) finger swabs - left hand.

From the left hand of Steven Farmer (DOB 3-16-52).

ITEM #3 - Fingernail scrapings - right hand.

From the right hand of Steven Farmer (DOB 3-16-52).

ITEM #4 - Fingernail scrapings - left hand.

From the left hand of Steven Farmer (DOB 3-16-52).

## PACKAGE 8177-2

ITEM #5 - One (1) buccal swab kit.

From Steven Farmer (DOB 3-16-52).

MAY 19 8 17 AM '08

REVIEWED:

PR:

CRIME SCENE ANALYST:

PR:

MPO ISD 10 (REV. 12-00) - AUTOMATED

3731

J. Smith

8177

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT**  
**FORENSIC LABORATORY EXAMINATION REQUEST**  
**CHEMISTRY AND BIO/DNA ANALYSIS**

**CONFIDENTIAL**

Primary Event/Case # 080516-1021

Date 5/17/08

|                                         |                                          |                                                                                                                                  |                                                                                              |                                         |
|-----------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------|
| Requested by<br><b>M. Pence, P#4950</b> | Detail/Bureau<br><b>CAYF/Sex Assault</b> | Agency<br><b>LVMPD</b>                                                                                                           | Phone #<br><b>828-3421</b>                                                                   | Court Date (if Known)<br><b>Unknown</b> |
| Booked By<br><b>M. Saunders</b>         |                                          | Has there been a previous request submitted on this case?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |                                                                                              | Incident<br><b>S/A</b>                  |
| Suspect(s)<br><b>Farmer, Steven</b>     |                                          |                                                                                                                                  | Suspect(s) in Custody<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |                                         |
| Victim(s)<br><b>Cagnina, Roxanne</b>    |                                          |                                                                                                                                  |                                                                                              |                                         |

Was a VALID Evidential Breath Test Given? ☐ Yes. Result: ☐ No

☐ Blood Alcohol (Submit Blood Alcohol Kit. Blood in gray top tube.)

☐ Blood Drug Screen \_\_\_\_\_  
DRUG(S) SUSPECTED

☐ Urine Drug Screen \_\_\_\_\_  
DRUG(S) SUSPECTED

☐ Controlled Substances  
(non-biological materials)

List items that need to be analyzed below.  
Indicate the drug suspected in  
"Description of Evidence" below.

|                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Headlight Examination<br><br><input type="checkbox"/> Arson Analysis<br><br><input type="checkbox"/> Other _____ | <input type="checkbox"/> Fiber: <input type="checkbox"/> Identify <input type="checkbox"/> Comparison (Submit Known Standards)<br><small>(X type of fiber analysis)</small><br><input type="checkbox"/> Paint: <input type="checkbox"/> Victim Vehicle Impact Point <input type="checkbox"/> Victim Vehicle Known (near impact point)<br><small>(X submitted materials)</small> <input type="checkbox"/> Suspect Vehicle Impact Point <input type="checkbox"/> Suspect Vehicle Known (near impact point) |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**CHECK X TO REQUEST ANALYSIS**

Evidence/Standards Submitted:

☒ Buccal Swab(s) from (names): **Steven Farmer**

☒ Sexual Assault Kit(s) from (names): **Roxanne Cagnina**

☐ Medical Examiner Kit(s) from (names): \_\_\_\_\_

☒ Other (describe): **Linens**

| ITEM NO. | QUANTITY | ITEM DESCRIPTION | ANALYSIS REQUESTED                |
|----------|----------|------------------|-----------------------------------|
| 1        | 1-3      | M. Saunders      | Hospital Gown, sheet & blanket    |
|          |          |                  | Check for suspect or victim's DNA |
|          |          |                  |                                   |
|          |          |                  |                                   |
|          |          |                  |                                   |
|          |          |                  |                                   |

**DETAILS / PERTINENT INFORMATION**

We need the following: Victim & Suspect's DNA profile; Victim's S/A kit examined for suspect's DNA; Suspect's oral swabs, finger swabs & fingernail scrapings examined for the victim's DNA; Hospital gown, sheet & blanket checked for victim & suspect's DNA.

**\*\*The S/A consisted of the suspect digitally penetrating the victim & perform oral sex on the victim. No semen/sperm should be involved.\*\***

Any questions, please call.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**FORENSIC LABORATORY EXAMINATION REQUEST  
COMPARATIVE ANALYSIS**

**CONFIDENTIAL**  
Primary Event/Case # 080516-1021  
Date 5/17/08

|                                  |                                   |                                                                                                                                  |                     |                                  |
|----------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------|
| Requested by<br>M. Pence, P#4950 | Detail/Bureau<br>CAYF/Sex Assault | Agency<br>LVMPD                                                                                                                  | Phone #<br>828-3421 | Count Date (If Known)<br>Unknown |
| Took By<br>M Saunders            |                                   | Has there been a previous request submitted on this case?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |                     | Incident<br>S/A                  |
| Suspect(s)<br>Farmer, Steven     |                                   | Suspect(s) in Custody<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                                     |                     |                                  |
| Victim(s)<br>Cagnina, Roxanne    |                                   |                                                                                                                                  |                     |                                  |

☐ Latent Print Development

Please list evidence items under "Evidence To Be Examined".

☐ Latent Print Comparison

Please list names and IDs of persons to be compared.

☐ AFIS Entry

Search AFIS eligible prints through database(s).

☐ Shoe Print Comparison

☐ Tire Impression

(List items to be compared below or indicate photos on file.)

☐ Hand-writing / Hand-printing Comparison  
(Submit Exemplars)

☐ Altered Documents

☐ Other

(Describe below if necessary).

☐ NIBIN\* Entry

\*National Integrated Ballistics Information Network

☐ Toolmark Comparison (e.g., pry mark to chisel)

☐ Distance Determination

☐ Bullets / Cartridge Cases to Gun

☐ Firearm Function Test / Test Firing

☐ Gunshot Residue Analysis (SEM Data)

☐ Caliber/Gun Make Determination

☐ Serial Number Restoration

☐ Other

(Describe below if necessary).

**DETAILS - PERTINENT INFORMATION**

TO:Metro, SAU/AB/NEG COMPANY:LVMPD

PAGE 001/001 Fax Server

**CONFIDENTIAL**

Arrested: 5/16/08  
Submitted: 5/19/08

**NOTICE OF DENIAL OF REQUEST**  
**CLARK COUNTY DISTRICT ATTORNEY**

TO: METRO SAU  
JEX #5597

DATE: May 19, 2008

YOUR DR#: 0805161021

DA FILE #: 08F10344X/TK8

STATE vs.

FARMER, Steven Dale #2679879

CHARGE: SEE NOTES BELOW

**REASON FOR DENIAL**

CASE APPROVED AS: SEXUAL ASSAULT (3 CTS); O/G LEWDNESS (2 CTS).

ALL OTHER CHARGES DENIED.

DISTRICT ATTORNEY

BY: ALEXANDRA C. CHRYSANTHIS/cas  
Chief Deputy

DISTRIBUTION: Addressee D.A. SCOPE Metro Jail

LVMPD0089

PA3084

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
PHOTO LINE-UP WITNESS INSTRUCTIONS

CONFIDENTIAL

NAME: CAGNINA, ROXANNE  
ADDRESS: 3717 ~~ST~~ LOWER SAGUN  
PHONE NUMBER: 702 870-5435

ALV NV  
89085

EVENT#: 080516-1021  
INTERVIEWED BY: M. SAUNDERS  
LOCATION: 6900 N. DURANGO  
LVN 59149  
DATE & TIME: 5/14/08 / 1400

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

SIGNED:

DATE & TIME: 5/14/08 / 1400

STATEMENT:

IT IS EITHER 2 OR 3. DEFINATELY / 3 LOOKS MORE LIKE HIM.  
THE MUSTACHE IS THINNER

SIGNED:

DATE & TIME: 5/14/08 1403

OFFICER'S NAME & P#: M. SAUNDERS #6070

LVMPD 104 (REV 5-96) - AUTOMATED WMP12

LVMPD0090

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
PHOTO LINE-UP RECORD

CONFIDENTIAL

EVENT #: 080516-1021

SUSPECT NAME: Steven D. Farmer

DATE: 05/16/08 TIME: 1400

| Position # | Name              | I.D. #  | DATE PHOTO TAKEN |
|------------|-------------------|---------|------------------|
| 1.         | William Southwick | 2584931 | 12/15/06         |
| 2.         | Scott Darts       | 1244670 | 09/19/02         |
| 3.         | Steven D. Farmer  | 2679879 | 03/16/05         |
| 4.         | Daniel Drumm      | 1714630 | 09/17/07         |
| 5.         | Richard Morelli   | 190930  | 10/20/00         |
| 6.         | John Wynn         | 933195  | 12/26/03         |
| 7.         |                   |         |                  |
| 8.         |                   |         |                  |

OFFICER CONDUCTING LINE-UP: M. Saunders P# 6076

REMARKS:

R. Cagnina

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
PHOTO LINE-UP RECORD

CONFIDENTIAL

EVENT #: 080516-1021

SUSPECT NAME: Steven D. Farmer

DATE: 05/16/08 TIME: 1400

| Position # | Name              | I.D. #  | DATE PHOTO TAKEN |
|------------|-------------------|---------|------------------|
| 1.         | William Southwick | 2584931 | 12/15/06         |
| 2.         | Scott Darts       | 1244670 | 09/19/02         |
| 3.         | Steven D. Farmer  | 2679879 | 03/16/05         |
| 4.         | Daniel Drumm      | 1714630 | 09/17/07         |
| 5.         | Richard Morelli   | 190930  | 10/20/00         |
| 6.         | John Wynn         | 933195  | 12/26/03         |
| 7.         |                   |         |                  |
| 8.         |                   |         |                  |

OFFICER CONDUCTING LINE-UP: M. Saunders P# 6076

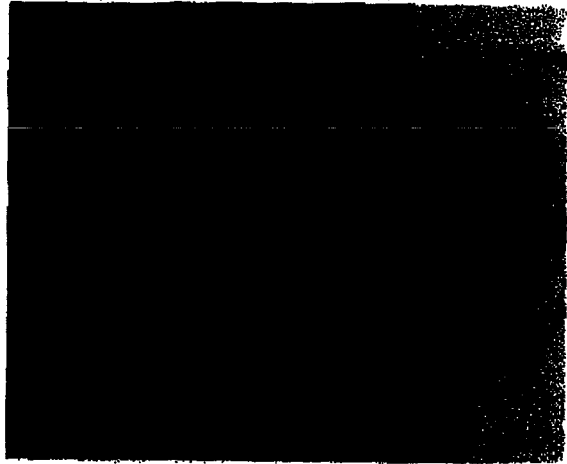
REMARKS:

R. Cagnina

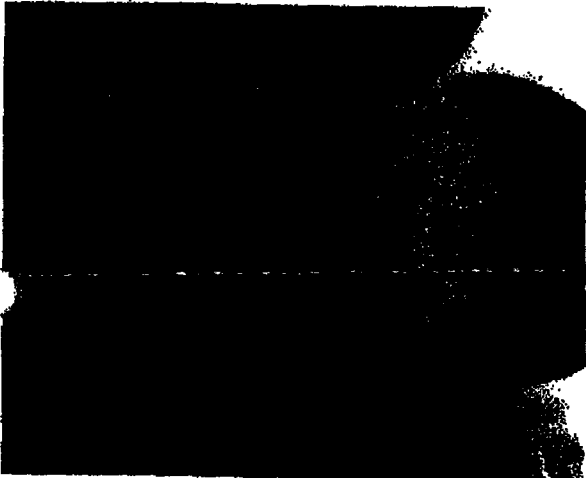




3



6



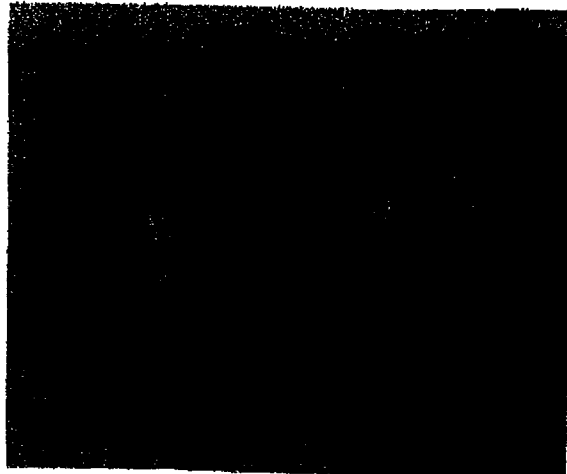
2



5



1



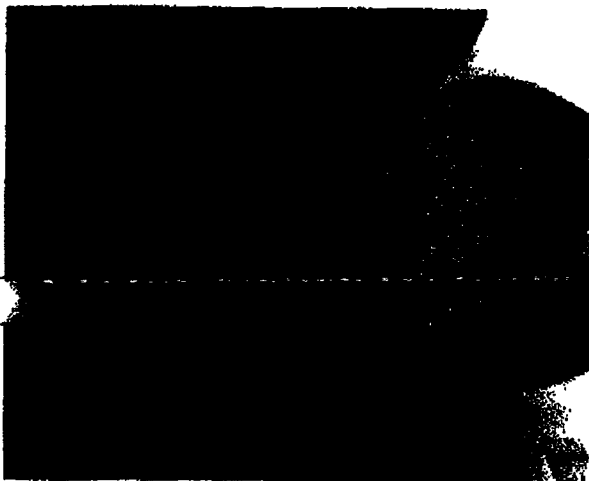
4



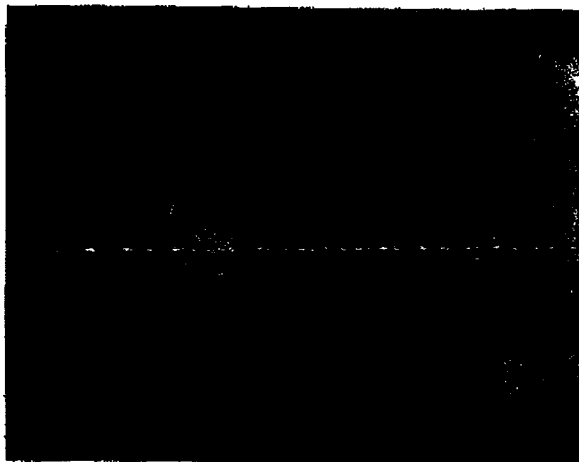
3



6



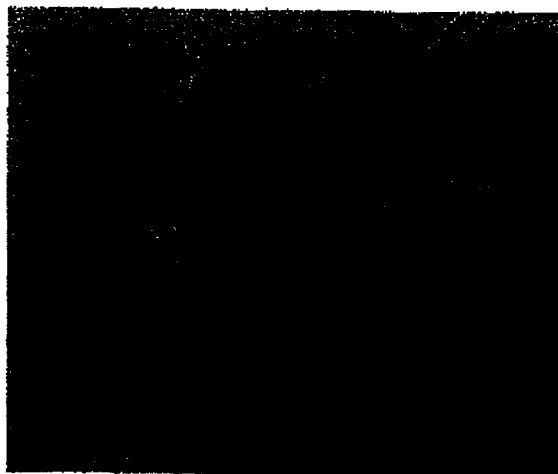
2



5



1



4

# Las Vegas Metro Police Department

**CONFIDENTIAL** 05-16-2008

Booking record for **SOUTHWICK, WILLIAM**

## Arrest Information

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



## Suspect Information

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

## Physical Description

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

**FOR LAW ENFORCEMENT USE ONLY**

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

# Las Vegas Metro Police Department

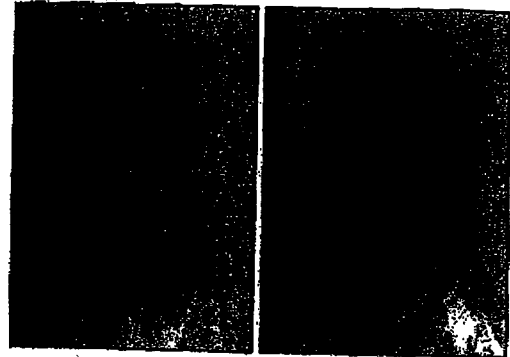
**CONFIDENTIAL**

05-16-2008

Booking record for **DRUMM, DANIEL**

## Arrest Information

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



## Suspect Information

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

## Physical Description

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

**FOR LAW ENFORCEMENT USE ONLY**

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

LVMPD0096

# Las Vegas Metro Police Department

**CONFIDENTIAL**

05-16-2008

Booking record for **MORELLI, RICHARD JOSEPH**

## Arrest Information

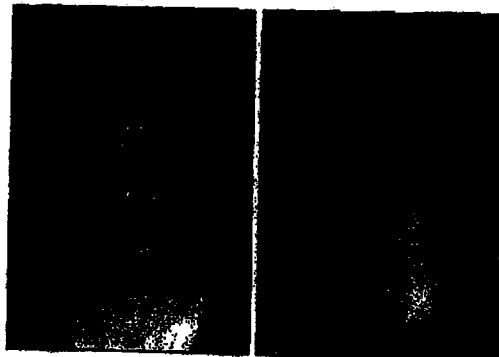
Transaction Number: 2022693 CS #: 0190930

FBI#: State ID:

Arrest Date: 10-20-2000 Arrest Time:

Arrest Officer : Arst Ofcr P#:

Charge:



## Suspect Information

Name: MORELLI, RICHARD JOSEPH

Address:

Birth Date: 09-26-1949

SSN #:

Drivers License #:

## Physical Description

Sex: Male Hair Color: Gray

Race: White Hair Length: Short

Eye Color: Brown Hair Style: Straight

Height: 5'10" Mustache: Mustache  
Beard: Beard  
Sideburns: Yes

Weight: 195 Complexion:

Glasses: No Build:

**FOR LAW ENFORCEMENT USE ONLY**

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

LVMPD0097

# Las Vegas Metro Police Department

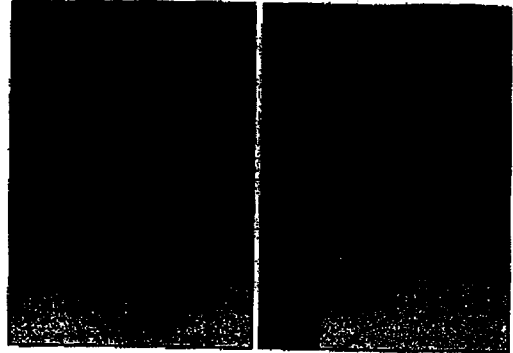
**CONFIDENTIAL**

05-16-2008

Booking record for **WYNN, JOHN**

## Arrest Information

|                     |                                                                                                   |               |        |
|---------------------|---------------------------------------------------------------------------------------------------|---------------|--------|
| Transaction Number: | 3102051                                                                                           | CS #:         | 933195 |
| FBI#:               |                                                                                                   | State ID:     |        |
| Arrest Date:        | 12-26-2003                                                                                        | Arrest Time:  | 22:37  |
| Arrest Officer :    | GUYER/LVMPD                                                                                       | Arst Ofcr P#: | 7430   |
| Charge:             | L5738-MISUSE OF BUS SHELTER BENCH - M-07756-<br>L5131-INDECENT/IMMODEST BEHAVIOR - M-07749-201.22 |               |        |



## Suspect Information

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

## Physical Description

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

**FOR LAW ENFORCEMENT USE ONLY**

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

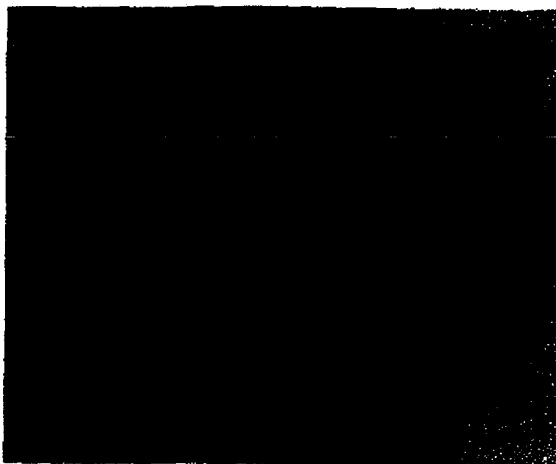
LVMPD0098

**CONFIDENTIAL**

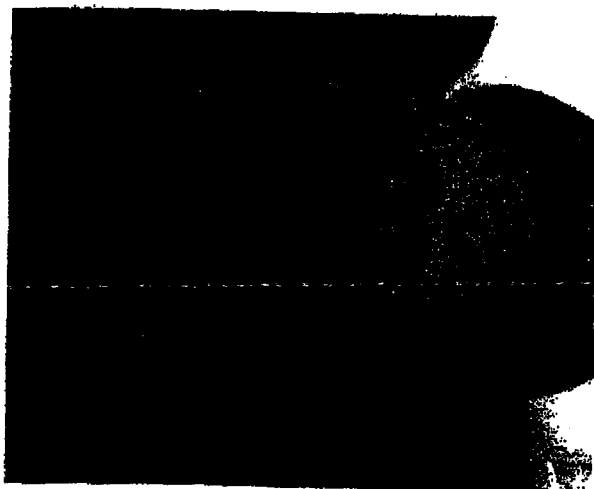
PA3094



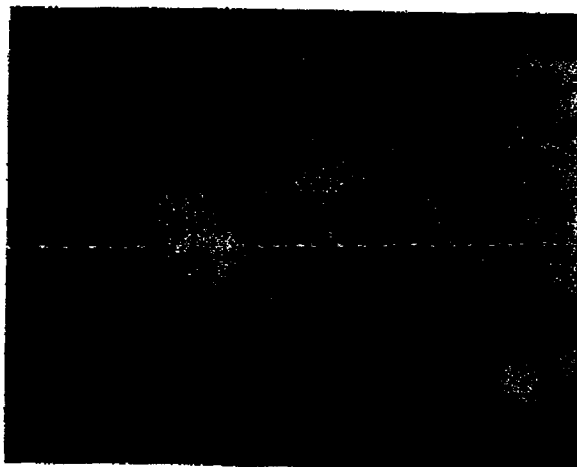
3



6



2



5



1





# ~~THE~~CALIFORNIA DEPARTMENT OF MOTOR VEHICLES

FOR USE ONLY AS AUTHORIZED BY DMV

**E0046991** DRIVERS LICENSE EXP DATE: 03/16/2009  
CLASS1: Non-Commercial C CLASS2:

**STEVEN DALE FARMER**

PO BOX 13  
ELDRIDGE CA 95431

DOB: 03/16/1952

SEX: M

HAIR: GRY

HEIGHT: 510

EYES: BLU

WEIGHT: 210

APP DATE:

09/08/2004

ISSUE DATE:

09/08/2004

PHOTO DATE:

09/08/2004

PHOTO SEQ #: 4224

APP OFFICE: 634

ISSUE OFFICE: 634

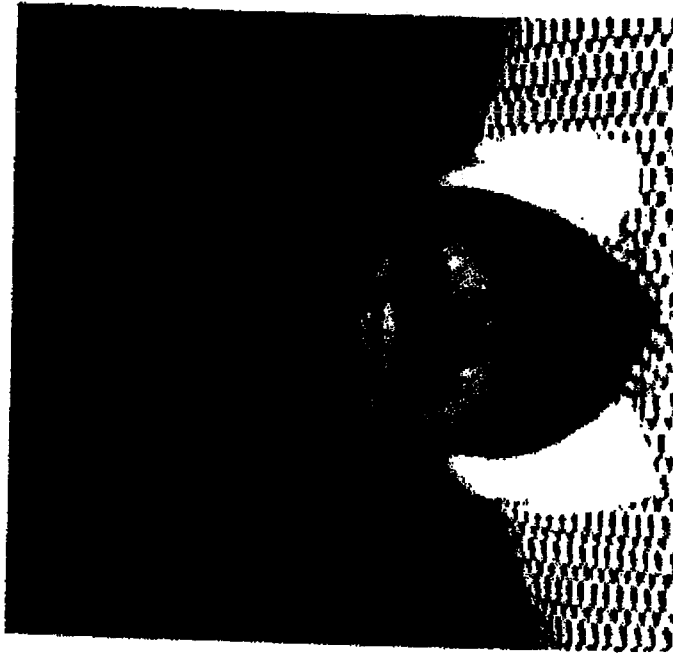
PHOTO OFFICE: 634

TECHNICIAN ID: B7

TYPE APP: D

RSTR:

ENDORS:



State of California  
DEPARTMENT OF MOTOR VEHICLES

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

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

Date \_\_\_\_\_

Signed \_\_\_\_\_

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

*Steven Dale Farmer*

CONFIDENTIAL

LVMPD0101

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

DRIVER LICENSE/IDENTIFICATION CARD  
LAW ENFORCEMENT INFORMATION REQUEST

615968

VERBAL INFORMATION

☐ Birthdate  
☐ Address  
☐ Status  
☐ DL/ID #  
☐ 77 Call  
☐ Other

**CONFIDENTIAL**

☒ **RUSH**

REASON

Number of Requests: 1

**INVESTIGATION**

☐ TRAK ID #

☐ Red ☐ Yellow

☐ FAX Only #

☐ FAX/Mail

Comments

REGISTRATION CODE/CDL OR

R9563

BADGE #

2804

☐ Pick Up

☒ Mail

☐ Express Mail

Courier Name

Account #:

Physical Address

City and State

☐ SSN VERIFIED

TELEPHONE NUMBER

(702) 828-5676

Zip

EXTENSION

AGENCY NAME

NV LAS VEGAS METRO PD/SEXUAL ASSAULT

GORSKI RUTH

ADDRESS

400 STEWART

CITY

LAS VEGAS

STATE

NV

ZIP

89101 -

RECEIVED

DATE

TIME

MVEXW2

5/16/2008

10:54 AM

LICENSE NUMBER

E0046991

BIRTHDATE

03/16/1952

☐ Certified

☐ TP

☐ P/O

☐ L1

☐ DL44

☐ SSN

☐ All Photos  
(attach M-8)

☐ M1 Attached

☐ Confidential Address

FARMER STEVEN DALE

ADDRESS

☒ Mug

☐ Sims

☐ Other

☐ Suspension

☐ Service

CITE DATE

COURT DATE

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
MEDIA RELEASE**

**DATE: May 16, 2008**

**EVENT #: 080516-1021**

**FOR IMMEDIATE RELEASE**

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

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

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

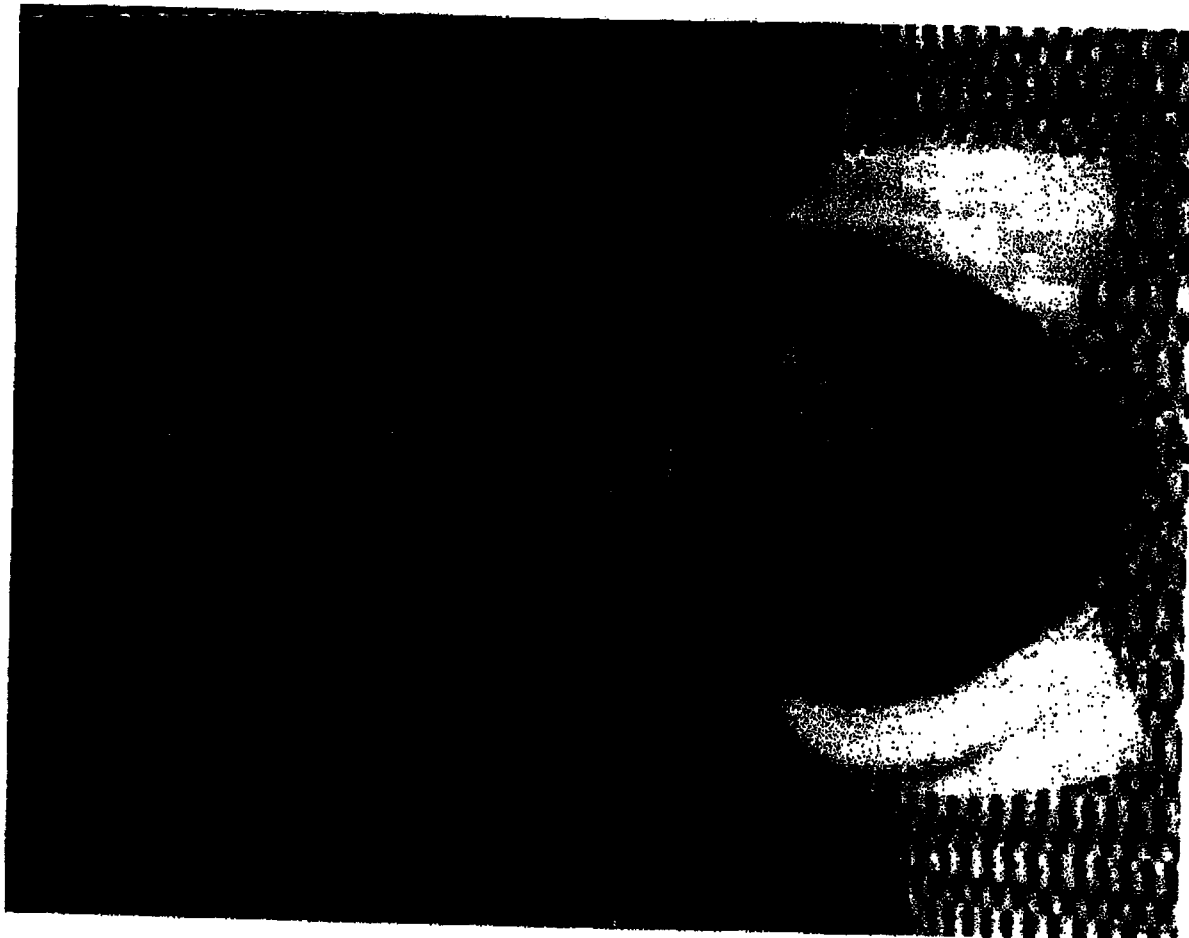
Farmer is a white male adult, 56 years of age, 5'10" tall, approximately 200 lbs. with grey hair and blue eyes. He was last seen wearing a mustache and a beard. Farmer also uses the last names of "Russnogle" and "Fournier". He was last know to be driving a 1989 Pontiac with California licences plates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

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

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

CONFIDENTIAL

STEVE  
FARMER



## NEVADA CRIME STOPPERS

4750 W. CAKEY, LAS VEGAS, NEVADA

PH: 702-828-3445 Fax: 702-828-3185

CONFIDENTIAL - DO NOT INCLUDE IN CASE FILE

TipSoft Generated Fact Sheet for Law Enforcement Use Only

CONFIDENTIAL

Report #: 194-6278

Caller #:

Client ID: 151

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

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

Call Taker: FT

|             |              |
|-------------|--------------|
| Perpetrator | Las Vegas NV |
|-------------|--------------|

**GENERAL**

Date Crime Occurred: Ongoing

Location of Crime: Unknown

Additional Information about the location of the crime: Unknown

Victim: Unknown

How is the caller aware of the crime: Caller saw the information on Channel 7 News report

Others with knowledge: Unknown

How caller heard about Crime Stoppers: Television, Newspaper

Danger to Tipster: Low

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

**SUSPECT**

No: 1 First: Steven Middle: Unknown Last: Farmer

Full Name: Steven Farmer

Alias or Nickname: Unknown

Race: White Gender: Male

Height: 5'10 Weight: 210Lbs

Age: 60 DOB: Unknown

Eyes: Unknown Hair: Unknown

SSN: Unknown SMT's: Unknown

Facial Hair: Unknown Clothing: Unknown

Address: Unknown City: Las Vegas

State/Prov: NV

Description of Residence: Unknown

Res Phone: Unknown Cell Phone: Unknown

Prior Criminal History: Unknown

Weapons: Unknown

Dogs/Animals: Unknown

Gang Activity: Unknown

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

**END OF REPORT**

The caller had no further information at this time.

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

\* The times have been adjusted to the recipients time zone.

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

**CONFIDENTIAL**

EVENT #080516-1021

**SPECIFIC CRIME: SEXUAL ASSAULT, OPEN AND GROSS LEWDNESS**

**DATE OCCURRED: May 16, 2008**

**TIME OCCURRED:**

**LOCATION OF OCCURRENCE: 6900 North Durango Drive**

**CITY OF LAS VEGAS**

**CLARK COUNTY**

**NAME OF PERSON GIVING STATEMENT: STEVEN FARMER**

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

**BEST PLACE TO CONTACT:**

**BEST TIME TO CONTACT:**

The following is the transcription of a tape-recorded interview conducted by DETECTIVE C. JEX, P#, LVMPD SEXUAL ASSAULT AND ABUSE SECTION, on May 16<sup>th</sup>, 2008, at 2205 hours.

Operator, this is Detective C. Jex, P Number 5597. I=I be conducting one interview reference Event Number 080516-1021. The, uh, location of the interview is 4750 West Oakey. Person being interviewed is Steven, S-t-e-v-e-n Farmer, F-a-r-m-e-r. Date of

LVMPD0106

PA3101

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 2

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

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

Q. All right. \_\_\_\_\_, just a couple things I wanna make sure that I=ve got.

Your date of birth of 3-16 of 1952?

A. Yes, sir.

Q. That=s correct?

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

Q. Okay. And it=s S-t-e-v-e-n, Farmer?

A. Yes, sir.

Q. Uh, do you have a middle name?

A. Dale.

Q. Dale. D B

A. a-l-e.

Q. Dale. And F-a-r-m-e-r?

A. Yes, sir.

Q. And the address, 80 B er 1841 Leonard?

A. Yes, sir.

Q. Okay. What B do you know what the ZIP code is there?

A. 89108.

LVMPD0107

PA3102

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 3

EVENT #080516-1021  
STATEMENT OF: STEVEN FARMER

Q. 9108. And your Social Security Number?

A.

Q.

A.

Q.

A.

Q.

A.

Q. And your cell, 707 332-5894?

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

Q. I= m sorry?

A. Yes.

Q. That=s correct?

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

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

Okay?

A. Okay.

LVMPD0108

PA3103



CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 4

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

- Q. You have the right to remain silent. Anything you say can be used against in a court of law. You have the right to the presence of an attorney. If you cannot afford a per B attorney, one will be appointed before questioning. Do you understand these rights?
- A. Yeah.
- Q. Okay. All right. What I B what B what I need from you, Steve, is B is there=s B there=s been an allegation made B
- A. \_\_\_\_\_
- Q. Um, that=s come from where you work.
- A. Um-hum.
- Q. And, uh Buh, some B an incident that took place, uh, earlier this morning, late last night B I=m not exactly sure when B while you were at work. Okay. You know anything about that? You been notified of anything like that?
- A. What do I have to do to get an attorney?
- (BY SERGEANT PENCE:)
- Q. What B I=m sorry. What was the question?
- A. I want to get an attorney.
- (BY DETECTIVE JEX:)
- Q. \_\_\_\_\_. So, you don=t wanna talk to me B

LVMPD0109

PA3104

**CONFIDENTIAL**

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

EVENT #080516-1021

STATEMENT OF: STEVEN FARMER

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

Q. Okay. All right.

Operator, end of interview. Time is 2209.

LVMPD0110

PA3105

**CONFIDENTIAL**

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

EVENT #080516-1021

~~STATEMENT OF STEVEN FARMER~~

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

CJ:tp

LVMPD0111

PA3106

**CONFIDENTIAL**

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

EVENT #080516-1021

**SPECIFIC CRIME:** Sexual Assault, Open and Gross Lewdness

**DATE OCCURRED:** May 16, 2008

**TIME OCCURRED:**

**LOCATION OF OCCURRENCE:** 6900 North Durango Drive

**CITY OF LAS VEGAS**

**CLARK COUNTY**

**NAME OF PERSON GIVING STATEMENT:** ROXANNE CAGNINA

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

**BEST PLACE TO CONTACT:**

**BEST TIME TO CONTACT:**

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

Hello, Operator, this is Detective M. Saunders, S-a-u-n-d-e-r-s, conducting one taped interview reference Event Number 080516-1021. Uh, this interview=s taking place at 6900 North Durango, Las Vegas, Nevada, uh, at the Centennial Hills Hospital, Room 725. Present for this interview, also, is going to be Sergeant M. Pence, P-e-n-c-e, P Number

LVMPD0112

PA3107

**CONFIDENTIAL**

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

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

4950. Interview=s taking place on the 16<sup>th</sup> of May, 2008, at approximately 1045 hours.

Um, person being interviewed, last name is Cagnina, C-a-g-n-i-na, first name of Roxanne. Date a birth of, uh, 7-6 of >73, Social Uh, address of seven B I=m sorry, 3717 Lower Saxon Avenue, North Las Vegas, Nevada, 89085. Has a home number of 870-5435.

Q. Roxanne, is that information I just read to you correct?

A. Yes.

Q. Okay. Uh, Roxanne, we=re here to investigate eh B the allegations that were B were brought up about a B a nurse that was assisting you this morning. Um, from your best recollection, starting with what you remember first B uh, whether comin= out a the ER, whatever it may be, can you tell us the details of what had occurred?

A. He was transporting me to my room, and it was B I think it was around three o=clock.

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

Q. Okay. Explain B what do you mean he was just B uh, adjusting your blankets.

A. He just kept making sure I was covered and.

Q. Okay.

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

LVMPD0113

PA3108

**CONFIDENTIAL**

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

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0114

PA3109

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 4**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0115

PA3110

**CONFIDENTIAL**

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

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Not at that time.
- Q. Not at the time. Okay.
- A. So, we got in the room, um B um, no one was in here but him and I.
- Q. Okay.
- A. And B
- Q. Hold on real quick. When you were gettin= off the elevator, where=d the other nurse go?
- A. I think she went the opposite direction.
- Q. Okay. So, she probably went down towards the nurse=s station, and he was the only one that brought you in the room?
- A. \_\_\_\_\_.
- Q. Okay. Do you know what time it was you got to the room, by chance?
- A. I would guess that, like, it was around three o=clock.
- Q. It was three-ish. Okay.
- A. Yeah.
- Q. All right. Please continue.
- A. Um, so, um, (inaudible voice present in background) he got me in bed, and he started rubbin= me, started rubbin= my shoulders. And I go, that=s not necessary or somethin= like that. And he goes, oh, Al=m just tryin= to relax you.@ And he actually \_\_\_\_\_ B

LVMPD0116

PA3111



CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 6

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

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

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

Q. You kind a what? I=m sorry B

A. I B I was afraid of him.

Q. Okay.

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

Q. And B and he said it was procedure?

A. Yeah. He said, Alt=s procedure.@

Q. Okay.

LVMPD0117

PA3112

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 7**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0118

PA3113

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 8

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Um, I wanna say he used both. My legs B I wanna say he used both.
- Q. Okay.
- A. And then at one point, he told me, just go ahead and put your hands up like this or  
somethin= like that. \_\_\_\_\_ B
- Q. He wanted you to lif B put your arms buh B
- A. Yeah. He goes, put B
- Q. B you hand behind your neck?
- A. He goes, APull your hair behind your B your neck.@ He goes, AAnd just relax.@  
He said, AJust relax.@ He \_\_\_\_\_ B
- Q. So, in the position that your in right now, arms B
- A. Yeah B
- Q. Arms above your head and hair B
- A. Um-hum B
- Q. B pulled up. Okay. Did you do that?
- A. I did that.
- Q. M=kay.
- A. I \_\_\_\_\_ B I, like, it \_\_\_\_\_ I very afraid.
- Q. Um-hum.

LVMPD0119

PA3114

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 9

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0120

PA3115

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 10

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. Unless he was touchin= my face.
- Q. M=kay. And then wuh B was B was his B were B were his hands also underneath your robe, touching your breasts?
- A. Yeah. He was \_\_\_\_\_ B
- Q. So, it was skin-to-skin contact B
- A. Hmm B
- Q. B is what I=m asking?
- A. He was penetratin= me.
- Q. Okay.
- A. He B
- Q. All right B
- A. He \_\_\_\_\_ B penetrate me \_\_\_\_\_. At that point, I just B I just, like, totally grabbed my camera, and I kept tryin= to take pictures. I just, you know, snap, snap, snap, snap.
- Q. You were tryin= to take pictures of him?
- A. Yeah, I was tryin= to take pictures of him.
- Q. Do you still have that phone?
- A. I do.
- Q. Did any a the pictures come out?

LVMPD0121

PA3116

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 11

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. No, they didn't come out.
- Q. Okay.
- A. I had no flash.
- Q. Okay. But it'll show a time and date, right?
- A. Um-hum.
- Q. Okay. Um, so, when um B uh, I wanna verify something really quick. Um, so, he first started rubbing your thigh, then he started rubbing your face. And the he said he needed to move the robe, it would be more comfortable for you. Is that correct?
- A. \_\_\_\_\_. He said that to me, AHere, \_\_\_\_\_ so you'll be more comfortable when you're sleepin.®
- Q. Okay. I know it's hard. And I'm B and I'm sorry to ask, but I just to make sure. Okay. Um, at that point, he started rubbing your thigh. And is that the first time he used his fingers to penetrate your vagina? Did he penetrate your vagina first, or did he rub your breasts first?
- A. He B he rubbed my breasts first.
- Q. Okay. So, he rubbed your breasts, then he went down and B and penetrated your vagina with B you said, both hands, usin=?
- A. Both hands and \_\_\_\_\_ both fingers.

LVMPD0122

PA3117

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 12**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0123

PA3118

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 13

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Okay. Well, after this, uh B after he used his hand the second time, did he go back up to your breasts first and then?
- A. I don=t think so.
- Q. You don=t B oh, okay.
- A. \_\_\_\_\_
- Q. So, then you said he went down there, and he B he actually used his B he put his face B
- A. Yeah. He \_\_\_\_\_ B
- Q. And B and his tongue on your vagina?
- A. He kept lickin= me all \_\_\_\_\_
- Q. Okay. Was the door open or closed when this was happening?
- A. It was closed.
- Q. Okay. And did he B was he B what is saying to you why he has his face down there?
- A. Nothing. He \_\_\_\_\_ B
- Q. Is there B in B do you remember?
- A. He just kept tellin= me, ARelax. It=s gonna help you sleep. It=s gonna help you sleep.@
- Q. M=kay.

LVMPD0124

PA3119



**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 14

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. He was just \_\_\_\_\_ you need to go to sleep. You need get to get some rest.
- Q. Did he B uh, was he aware a what medication that you were on?
- A. Yes, he was. He \_\_\_\_\_ B he was B he \_\_\_\_\_, um, all the medication you have in your system.
- Q. Um-hum.
- A. He said, AYou should be asleep by now.@
- Q. Okay. Did B was he the assisting nurse in anything done in the ER Room
- A. \_\_\_\_\_
- Q. Okay. Um, did you ever tell him no or stop?
- A. Yes, I did.
- Q. At which point?
- A. The first time he touched me.
- Q. The first time he touched you.
- A. \_\_\_\_\_ B
- Q. Is this before the penetration B
- A. I was \_\_\_\_\_ B
- Q. Is this before the pene B

LVMPD0125

PA3120

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 15

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

LVMPD0126

PA3121

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 16

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

seven o'clock in the morning to make sure that you=re okay.@ And I B I found  
that kind a odd. So, I B I \_\_\_\_\_. I woke up B I don=t think I slept at all.

Q. M=kay. At what B

A. I B

Q. Okay B

A. And, like, \_\_\_\_\_ B

Q. Do you know what B

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

Q. B time it was that he left? The room?

A. It was \_\_\_\_\_ 15 minutes.

Q. It was about 15 B so, he was in the room with you about 15 B all this occurred over  
a period of about 15 minutes?

A. Hmm.

Q. Okay. Eh B okay. So, what B what happened after he left?

A. Well, after he left, um, nothing. I B I kept trying B I B I B I kept try B I tried to call  
home.

Q. On your cell phone?

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

LVMPD0127

PA3122

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 17

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum. Did you finally fall B
- A. That B
- Q. B asleep?
- A. I fall B
- Q. \_\_\_\_\_ B
- A. I think I fell asleep and then B
- Q. Did you actually B were you able to actually call out on the room phone?
- A. \_\_\_\_\_.
- Q. No? Okay.
- A. No. But first thing in the morning, I called my husband B
- Q. \_\_\_\_\_ B
- A. B I think. It must a been six thirty, and I told him. I said, ACan you get here before seven?@ And I don=t know if I went through to detail with him.
- Q. Okay.
- A. At seven B I said, At need you here at seven.@ I believe I B I told him what was goin= on,
- Um, and then as soon as the nurse came in, my nurse B
- Q. \_\_\_\_\_ B
- A. I asked for the nurse that was in charge.

LVMPD0128

PA3123

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 18

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Um-hum.
- A. I said, ACan I please speak to the nurse in charge?@
- Q. Um-hum.
- A. The main nurse. And she=s, like, \_\_\_\_\_ B
- Q. And what time was that at when this other nurse came in?
- A. Um B
- Q. Had you called your husband B
- A. B they both met here at the same time. It was seven o=clock.
- Q. It was a B roughly, seven o=clock?
- A. Um-hum B
- Q. Okay.
- A. >Cause B well, at seven, seven-twenty. >Cause I was surprised to see him back here.
- Q. I=m sorry.
- A. And then I called 9-1-1. And I didn=t know what to tell >em, so hung B
- Q. Um-hum B
- A. B up.
- Q. Okay. Then B and then you called 9-1-1?
- A. \_\_\_\_\_.

LVMPD0129

PA3124

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 19

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Eh B
- A. I called 9-1-1 B
- Q. Um-hum. On your cell or from your room phone?
- A. On my cell.
- Q. Okay. Um, when he came back to the room, did he say anything?
- A. Him and the nurse B he walked in, and then the nurse walked in after him. And the nurse was being kind a suspicious. And she goes, are you B
- Q. Is it the nurse that=s working right now?
- A. Uh-huh. She goes, AAre you her husband?@ And he goes, ANo, I was her@ B her B her Anurse downstairs.@
- Q. Um-hum.
- A. He goes, AI was just comin= up here to check on her.@ And she kind a had this look. And I kind a looked at her, kind a like B
- Q. Did you say anything to her at that time?
- A. He looked at me, and I B and I don=t remember if I said anything. He just kept glarin= at me. And B
- Q. Explain glaring. What do you mean by he was glaring at you?
- A. Glarin= in a way that I B that I=d be afraid.
- Q. Okay. Making, uh B a threatening manner?

LVMPD0130

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 20

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

Q. Okay. Like, what do you B what do you think he was implying by glaring at you?

A. Just, like, shut your mouth or something like that.

Q. Okay. Did you tell this nurse that showed up in your room what happened, or did she get the head nurse like you asked?

A. No. I asked her to get the head nurse.

Q. Okay. And then the head nurse came in?

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

Q. Was that, uh, Vickie? (phonetic)

A. I believe so.

Q. M=kay. And then you told her what had occurred?

A. Hmm.

Q. Okay. Um, at what time did your husband get here?

A. Um, shortly after he \_\_\_\_\_. He had to drop the kids off. He B he had

\_\_\_\_\_ B I don=t \_\_\_\_\_ comes on. Um, \_\_\_\_\_.

Q. Okay.

A. And I said, ABut he=s working downstairs,@ and he just, AWell, if he shows up,@ then B

Q. Um-hum B

A. AThen push the button.@

LVMPD0131

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 21

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. M=kay.

A. But I didn't have B reach \_\_\_\_\_ B

Q. \_\_\_\_\_ B

A. So.

Q. I understand. How many individual times B that B would he start and stop B how many times did he touch your breasts?

A. \_\_\_\_\_ last time?

Q. Uh B okay. I mean, like B

A. He B maybe, like, ten or fifteen.

Q. Okay. What B what I mean by that is if he B if he went underneath your top B or even on the outside a your top, if he started feeling your breasts, if he stopped and then went B started rubbing your hair, and then went back to rubbing your breasts and then tried to touch you between your legs, and he went back to rubbing your breast. How many times do you think that he actually, individually B

A. You mean, like here B

Q. How B

A. B and then B

Q. B separate times B

LVMPD0132

PA3127



LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 22

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- A. B here B
- Q. Yes. If he B if he went B
- A. Here and B
- Q. B from your breasts to your B yeah, whatever it was?
- A. Probably about thirty times.
- Q. About 30. M=kay. And how many times did he use his hands to start and stop penetrating that you think?
- A. When he=s \_\_\_\_\_ hands. He kept tellin= me that he had big fingers. It was B AWhat I wanna do is make you come.@
- Q. Did he say this while he was usin= his fingers, or while he put his face down there?
- A. While he was usin= his fingers.
- Q. Do you recall B do you remem B do you feel like he was using both hands, or could you only feel one hand?
- A. No. I feel it was with one hand.
- Q. You only feel one hand. Okay. And, um, how many times would you say B
- A. This was \_\_\_\_\_.
- Q. Um-hum. (Inaudible voice present in background)
- A. Like, about nine times.

LVMPD0133

PA3128

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 23

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. About nine times. Okay. What about with his face? How long B how long was he B
- did B do you think performed orally on you for?
- A. About five.
- Q. For about five minutes, you think?
- A. Um, no, about five different times.
- Q. Oh, he went down B Okay, about five times. Okay. So, what did he B would he go down and then stop and come up, and then go back down, and then stop and come up, and then go back B or was it just, he would stop briefly and then go back?
- A. He was B after he was all finished here B
- Q. Um-hum B
- A. B \_\_\_\_\_ that=s when he went down there.
- Q. And he just stayed down there?
- A. Um-hum.
- Q. Okay. Um, okay. Did he make any other B any B it B now, you B there was information, something about a phone number. What B what, uh B what occurred with a phone number?
- A. Well, downstairs, they were B they were wonderful to me.
- Q. Um-hum.

LVMPD0134

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 24

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. And then the female nurse B um, you can ask them. I said, can you please give me a phone number B and your B I need B I don=t even think I asked, uh, for a phone numbers. I said, ACan you give me your information? I=d like to@ ruh B write a ruh B

Awrite a letter@ and Ato the corporation@ um, Ato let them know@ that Ahow great you guys have been.@ >Cause down there, he was very professional.

Q. Um-hum.

A. You know, but then I was in a surrounding.

Q. Right. So, did he give you his phone number?

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

Q. Okay. Did you get the phone number from the other nurse?

A. Um, I believe so.

Q. Okay. Don=t B don=t worry about it right B we B we can B we can verify that later.

I=ve some B \_\_\_\_\_ B

A. Um, I believe so.

Q. Okay.

A. Um, yeah.

Q. Okay. Have you ever met him before?

A. No.

Q. Never seen him before? Okay.

LVMPD0135

PA3130

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 25

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. Um-um.

Q. And, uh, when was the last time you and your husband were sexually active? Has it been in the last 72 hours?

A. Um, yes.

Q. Okay. About how long ago was that?

A. Hmm, probably a week ago.

Q. A week ago. Okay. So, it was longer than 72 hours, longer than three days ago?

A. Yeah.

Q. Okay. Um, would we have any occasion to find any other male DNA or anything on you other than your husband=s? Or maybe this guy B

A. \_\_\_\_\_ find saliva.

Q. You=ll think B suhl B okay. And, wuh B will you allow us to have a B a SANE exam done on you? Have a certified nurse come and try to collect evidence?

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

Q. At any time did he put his penis in you?

A. No.

Q. Anything like that? Okay. Did he ever rub his penis anywhere on your body?

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

Q. No. Did he lay on top of you or kiss you?

A. No. No. He was really \_\_\_\_\_ about the other nurse comin= in.

LVMPD0136

PA3131

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 26

**CONFIDENTIAL**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

- Q. Okay. And while he was doin= B what side of the bed was he standing on?
- A. This side.
- Q. He was standin= right there?
- A. \_\_\_\_\_.
- Q. Okay.
- A. Hmm.
- Q. And the whole time, his hands were underneath the blankets, hmm, and everything?
- A. \_\_\_\_\_.
- Q. Okay. Are these the same blankets?
- A. Um-hum.
- Q. These are the same blankets?
- A. Hmm.
- Q. Okay.
- A. They haven=t B
- Q. An B
- A. B changed,
- Q. And yours B did B do you remember him B did he ever wipe his hands on anything, any blankets, your B your robe or anything?
- A. Um B

LVMPD0137

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 27

CONFIDENTIAL

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. Did he was his hands in the sink, did he do anything like that?

A. I don=t \_\_\_\_\_.

Q. Okay. And the last time you saw him was seven o'clock this morning, and then  
he B after he said he was just comin= to check on you, he up and left and B

A. That=s \_\_\_\_\_ he seen the nurse, he was just, like, \_\_\_\_\_ B

Q. All right. Okay.

Sgt. Pence, do you have any questions?

MP: Uh, I have just a couple a questions.

(BY SERGEANT PENCE:)

Q. Just for clarification purposes, um B I know Detective Saunders asked you, but I  
want to be positive on your answer. Did he touch your breasts over or under your  
clothes?

A. Underneath.

Q. Okay. And what position was your bed in this whole time?

A. Um, I think that it was, probably the way it is now.

Q. So, your head was inclined a little bit?

A. Hmm B maybe, a little bit down, >cause I was tryin= to go to sleep.

(BY DETECTIVE SAUNDERS:)

Q. You had a slight incline?

A. Yeah. It=s, like, a little bit more down.

LVMPD0138

PA3133

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 28**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

(BY SERGEANT PENCE:)

Q. Okay. And, um, he didn't kiss anywhere else on your body?

A. No.

Q. Okay. Did he penetrate anywhere else on your body other than your vagina?

A. No.

Q. No. Okay. Um, how did he B how did give you his phone number?

A. Downstairs, the nurse B there was a female nurse B

Q. Um-hum.

A. B and there was him. And I kept tellin= her over an over B >cause I think she was my head nurse. And I kept tellin= her B her and him. I said, AYou guys are great. I hate to bother you guys, but I=m gonna write a letter of recommendation.@

Q. \_\_\_\_\_ B

A. You know, tellin= how great you guys are. So, if you guys can give me your information, I=d love to do that for you.

Q. Okay.

A. I said, A I really do appreciate how well you guys are taking care of me.@

Q. Okay.

A. So, that=s how \_\_\_\_\_ B

(BY DETECTIVE SAUNDERS:)

LVMPD0139

PA3134

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 29**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. Now, was she the one B

MP: How B

MS: I= m sorry, Sergeant Pence B

(BY SERGEANT PENCE:)

Q. How did he give it to you, though. I mean you=re B I know you=re B you told him and the other nurse you wanted their information. Did he tell it to you verbally, and you wrote it down? Did he write it down? How did B how did you get his information?

A. Um, I had my purse here at the here at the B at the whole time.

Q. Uh-huh.

A. And that=s B I pulled out somethin=, and I handed it to him.

Q. Do you know what it was you pulled out?

A. Yeah.

Q. What was it?

A. I pulled out my check book.

Q. Okay. And you asked him to put his information in the checkbook?

A. Yeah. But I noticed, after looking at it, he didn=t put his name on it.

Q. Okay. Did you tell him what information you wanted?

LVMPD0140

PA3135



**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 30

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. I just said, well, I=d like your B you B you nuh B down \_\_\_\_\_. I=d like your

name , information, stuff, so I can write a letter of recommendation, which I would assume, name, number, nurse. Not even number, really, I would just assume.

\_\_\_\_\_ B

Q. Then you also told this to the other female nurse?

A. Several times, I \_\_\_\_\_ her.

Q. Did you ever get her information?

A. Um, I believe so.

Q. Do you know where you got B where her information is?

A. Um, if I look through my purse, I can probably \_\_\_\_\_ B

Q. That=s okay.

MS: \_\_\_\_\_ B

(BY SERGEANT PENCE:)

Q. We=ll do that later. I just didn=t know if you knew off hand.

MS: Wuh B was this B

(BY SERGEANT PENCE:)

Q. Just hold off on that. We=ll B we=ll get it later.

A. Um, if you find the nurse he was working with and ask her B

LVMPD0141

PA3136

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 31

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. Um-hum.

A. Um, she remember, >cause I kept askin= her several, several times.

Q. Okay. Did you B eh, did you ever hand her the same thing you handed him to get her information?

A. No.

Q. Okay.

A. I think, um B if I=m not mistaken, she wrote it on a separate piece of paper.

Q. And it B the nurse that was working with him downstairs, is that the same nurse that helped transport you up here to this room?

A. No.

Q. A different one?

A. Yeah. She was my B I believe she was my head nurse, and he was a back nurse.

Q. She, being the one you asked for the information?

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

Q. Okay.

A. And she was B she was the back-up B he was the back-up nurse, and she was the nurse that was assigned to me.

(BY DETECTIVE SAUNDERS:)

Q. \_\_\_\_\_. Who was the nurse that went upstairs with you and B

A. He was.

LVMPD0142

PA3137

CONFIDENTIAL

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 32

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. And then who B who was the other nurse that was B

A. I don=t know B

Q. She was just B

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

Q. B another nurse in the ER B

A. B she was a nurse.

Q. Okay. All right.

(BY SERGEANT PENCE:)

Q. Now, do you know his name?

A. Um, if I=m not mistaken, it=s John. (phonetic)

Q. And why do you think it=s John?

A. Um, because I asked. I asked down there. I go, what B wuh B what B AWhat was your name?@ Like that. And >cause I kept callin= him \_\_\_\_\_

Q. Okay.

A. And he goes, AWhy are you callin= me \_\_\_\_\_.@ And \_\_\_\_\_ I don=t know, you look like a B you like a Scott. Maybe it=s >cause I used to call my husband \_\_\_\_\_. >Cause he goes, no, it=s John, and he said it laughing. I go, John, it=s not funny. >Cause I was bein= very friendly down there.

Q. Um-hum.

LVMPD0143

PA3138

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 33**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

A. You know. I go talk friendly >cause you probably don=t even know my name.

And he didn=t know my name.

Q. Was he wearin= a name tag?

A. Um, no.

Q. Can you describe him for me?

A. All I know is he had white hair. White hair, white beard.

Q. We=re talkin= white-white, like the blankets, or just blonde?

A. White.

(BY DETECTIVE SAUNDERS:)

Q. And how old is he, do you think?

A. I have to say suh B suh B sixty.

(BY SERGEANT PENCE:)

Q. Sixty. And he B about tall?

A. Hmm, probably about five-seven.

Q. Approximate weight? You know?

A. Hmm, probably, like, 230.

Q. So, he=s a big man?

(BY DETECTIVE SAUNDERS:)

Q. So, he=s B

A. He=s \_\_\_\_\_ B

LVMPD0144

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 34

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

Q. B he=s heavy. He=s heavy but not too tall?

A. Yeah. He=s got, like, a potbelly, but, like B like, B he=s a tall man.

(BY SERGEANT PENCE:)

Q. Facial hair?

A. Um-hum, all white beard.

Q. He have a mustache as well?

A. Um-hum.

MS: Neatly B

(BY SERGEANT PENCE:)

Q. Long beard? short beard?

A. Uh, I think it was short.

(BY DETECTIVE SAUNDERS:)

Q. Trimmed?

A. Um-hum.

(BY SERGEANT PENCE:)

Q. Anything unique about his teeth?

A. I didn=t see that much of \_\_\_\_\_.

MS: Hmm.

(BY SERGEANT PENCE:)

Q. Did you see any tattoos?

LVMPD0145

PA3140

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 35**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

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

Q. And was he wearing glasses?

A. No. Not that I knew. That I that I know.

(BY DETECTIVE SAUNDERS:)

Q. Okay.

A. I just know that without a doubt, he was my nurse downstairs.

Q. Okay.

A. He was the one who transferred me B

Q. Did B

A. B to my bed. And he was, like, I=m gonna take \_\_\_\_\_, you know, so.

Q. Did he ever say, you know, he wants to call you later, or he wants to meet with you later or anything along those lines? Other than coming back at seven o=clock in the morning to see you?

A. No. He just said, um, when I get off of work, I might stop up here and check in on you at seven, or somethin= like that.

Q. Okay.

(BY SERGEANT PENCE:)

Q. He=s the same one who did \_\_\_\_\_?

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

Q. Okay.

LVMPD0146

PA3141

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 36**

EVENT #080516-1021

STATEMENT OF: ROXANNE CAGNINA

I don=t have anything else.

(BY DETECTIVE SAUNDERS:0

Q. Was B was that a yes, he=s the same one who did this to you?

A. Definitely, yeah.

Q. Okay. All right.

Operator B

A. My husband walked in shortly B and he just missed him, and he left.

\_\_\_\_\_  
Q. Okay.

Operator, this will end the interview. The time is 1114 hours on the 16<sup>th</sup> of May,

2008. Same people present. Same location.

Thank you.

LVMPD0147

PA3142

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 37**

EVENT #080516-1021

~~STATEMENT OF ROXANNE GAGNIN~~

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO  
DRIVE, ROOM 725, ON THE 16th DAY OF MAY, 2008, AT 1114 HOURS.**

**MS:tp**

LVMPD0148

PA3143



**CONFIDENTIAL**

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

EVENT #: 080516-1021

SPECIFIC CRIME: SEXUAL ASSAULT

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: LORRAINE WESCOTT

|                |                                               |                    |              |
|----------------|-----------------------------------------------|--------------------|--------------|
| DOB:           |                                               | SOCIAL SECURITY #: |              |
| RACE:          |                                               | SEX:               | FEMALE       |
| HEIGHT:        |                                               | WEIGHT:            |              |
| HAIR:          |                                               | EYES:              |              |
| WORK SCHEDULE: |                                               | DAYS OFF:          |              |
| HOME ADDRESS:  | 6900 NORTH DURANGO<br>LAS VEGAS, NEVADA 89149 | HOME PHONE:        | 702-629-1189 |
| WORK ADDRESS:  |                                               | WORK PHONE:        |              |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE M. SAUNDERS, P# 06076, LVMPD SEXUAL ASSAULT Detail, on MAY 29<sup>TH</sup>, 2008 at 1340 hours.

Q. Hello operator, this is Detective M. Saunders, S-A-U-N-D-E-R-S, P# 6076, conducting one followup taped interview reference event number 080516-1021.

This interview=s taking place at 6900 North Durango, Las Vegas, Nevada 89149

**CONFIDENTIAL**

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

**EVENT #: 080516-1021**

**STATEMENT OF: LORRAINE WESCOTT**

at the Centennial Hills Hospital. Uh, the time is uh, 1340 hours on the 29<sup>th</sup> of May, 2008. Present for this interview last name of Westcott, W-E-S-T-C-O-T-T, first name of Lorraine, L-O-R-R-A-I-N-E. Uh, she is the nursing supervisor here at Centennial Hills Hospital. Uh, work phone number here is 629-1189. Is that information I just read true and correct?

A. Um, except you spelled my name wrong.

Q. I=am sorry, how do you spell your name?

A. There=s no T in the middle.

Q. Oh, there=s no, there=s no, no T, it is just Wescott, WbW-E-S-C-O-T-T?

A. Mm-hmm.

Q. Okay. W-E-S-C-O-T-T. And I=am here to speak with you about the incident that occurred uh, back on the 16<sup>th</sup> of uh, May. Um, were you working on that day?

A. Yes I was.

Q. Okay. In, in what capacity?

A. I was in a suBsupervisor.

Q. Okay. And on that morning were you called up to room 725 in reference to talk to a patient by the name of Roxanne uh, Cagnina?

A. Yes I was.

Q. Okay. Can you tell me what that uh, that conversation consisted of?

LVMPD0150

PA3145

**CONFIDENTIAL**

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

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

A. Um, when I went to the room the um, patient was crying. She reported that she had gone to the emergency room and the nurses last that were just wonderful to her. She didn't have their phone numbers. On the elevator, on the way up she stated that the male nurse started adjusting her gown under the blanket. After she got into bed he said he'd be back, be back to check on her. She stated that he returned between 7:00 and 7:30 and started to touch her privates areas. She said that he told her how beautiful she was, touched her breasts. He said not to tell anyone, he'd lose his job. She then stated that he stroked her legs. She said he tried to penetrate her with his fingers, she told him no um, then another person came in and I guess he left. She said she called 9-1-1 but didn't know what to tell them. Um, I asked her to describe the person, she said that he was an older man, white hair and a beard. Um, he had written his number in her checkbook register so she gave me his number. Obviously I tried to comfort her, reassure her.

Q. Mm-hmm.

A. Um, her husband came in so I didn't have to have anybody sit with her >cause he stayed with her.

Q. Okay.

A. Um, I obviously notified my superiors.

LVMPD0151

PA3146

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 4

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

Q. Mm-hmm.

A. Um...and um, I also called the number that she gave me and Steve Farmer answered the phone.

Q. Okay. And, I=m sorry, Steve Farmer answered the phone?

A. \_\_\_\_\_ the phone.

Q. Okay. And is that who she alleged uh, did this to her or wasBwasB

A. Well I was just checkingB

Q. Bwas this the nurse?

A. Bon the white hair and the beard andB

Q. Uh-huh.

A. Bthe phone number >cause, you know obviously I needed to knowB

Q. Okay.

A. B\_\_\_\_\_ (Both Talking)

Q. WheBwhen Steve answered the phone what did he say?

A. Um, I identified myself and I saidB

Q. Mm-hmm.

A. Byou know um, is this Steve and he=s like yeah, it=s Steve, you know what do you need and I just told him that I was just checking up on him so.

Q. Okay, you just said you were checking up on him?

LVMPD0152

PA3147

**CONFIDENTIAL**

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

**EVENT #: 080516-1021**

**STATEMENT OF: LORRAINE WESCOTT**

A. Right.

Q. Okay. Not to alert any suspicion or anything like that?

A. No, I just needed to know and I was like B

Q. Right.

A. B \_\_\_\_\_ (Both Talking)

Q. Okay. And she said that that the phone number that you called for Steve, that was given to her by the same man who um, was touching her and B

A. Right.

Q. B \_\_\_\_\_ (Both Talking)

A. He had written his number in her um, check register.

Q. Okay. Do you remember what that phone number was that she gave you?

A. It was area code 707-332-5894.

Q. Okay. And did she \_\_\_\_ do you remember did she tell you that he actually penetrated her or that he was attempting to penetrate her? Or B

A. Um, my notes have that he tried.

Q. He tried. Okay. Do you, do you ever remember her saying that he=d actually did?

A. No, that=s the only thing. I wrote down B

Q. No. Okay. But B

LVMPD0153

PA3148

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 6

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

A. Bexactly what she told me.

Q. Bbut it is what she told you. Now did she say this occurred at what time, what time in the morning was it when it happened?

A. She said he came back between 7:00 and 7:30.

Q. Okay. And \_\_\_ she=s saying that=s when he started doing the touching?

A. No, she said it started on the elevator the night when he brought her up, around 3:00 in the morning.

Q. Okay. All right. And...did she um...didBdid she give you a specific time or doBdo you have um, do you know what time it was that she was brought up from the E.R. to her room, do you have, do you remember what time it was?

A. I never got to check but the patient told me it was around 3:00 a.m..

Q. It was about 3:00 a.m..

A. I never thought to check.

Q. Okay.

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

Q. Okay. And then after she told then you of course ran it up the, youByou went to your supervisor=s andBband your superiors and made sure that everyone was, was documented in knowing? Okay. Um, have you ever had a problemBhave you ever met uh, Steve Farmer?

LVMPD0154

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 7

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

A. Yes, I have.

Q. Okay. And you=ve worked with him in the past?

A. Um, he=s the night shift I=m the day shift so obviously \_\_\_\_\_ checked in the office,  
I=ve never worked with him.

Q. Okay, you=ve just seen him in passing basicallyB

A. \_\_\_\_\_ (Both Talking)

Q. Bbut you were aware of who he was?

A. Yes.

Q. \_\_\_\_\_ has there ever been any other complaints against him that you were aware of  
uh, prior to this incident?

A. No.

Q. No. Okay. Um, all the other nurses get along with him and no problems with  
him?

A. It seems um, that everyone really, you know enjoyed working with him.

Q. Okay. All right. Um, is there anything else that you can think of that can assist  
me in my investigation as I=m following up other leads on Mr. Farmer? Anything  
that I forgot to ask you that you think might be important?

A. (Pause) Nope, I don=t think so.

LVMPD0155

PA3150

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 8

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: LORRAINE WESCOTT

Q. No. Okay. All right. Operator, this will end the interview, the time is uh, 1345 hours on the 29<sup>th</sup> of May, 2008. Same people present. Same location.

---

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 NORTH DURANGO,  
LAS VEGAS, NEVADA 89149 ON THE 29<sup>TH</sup> DAY OF MAY, 2008 AT 1345 HOURS.**

MS:az

LVMPD0156

PA3151



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

**CONFIDENTIAL**

EVENT #: 080516-1021

**SPECIFIC CRIME:** SEXUAL ASSAULT/ OPEN AND GROSS LEWDNESS

**DATE OCCURRED:**

**TIME OCCURRED:**

**LOCATION OF OCCURRENCE:**

CITY OF LAS VEGAS

CLARK COUNTY

**NAME OF PERSON GIVING STATEMENT:** KAREN GOODHART

|                       |  |                           |  |
|-----------------------|--|---------------------------|--|
| <b>DOB:</b>           |  | <b>SOCIAL SECURITY #:</b> |  |
| <b>RACE:</b>          |  | <b>SEX:</b>               |  |
| <b>HEIGHT:</b>        |  | <b>WEIGHT:</b>            |  |
| <b>HAIR:</b>          |  | <b>EYES:</b>              |  |
| <b>WORK SCHEDULE:</b> |  | <b>DAYS OFF:</b>          |  |
| <b>HOME ADDRESS:</b>  |  | <b>HOME PHONE:</b>        |  |
| <b>WORK ADDRESS:</b>  |  | <b>WORK PHONE:</b>        |  |

**BEST PLACE TO CONTACT:**

**BEST TIME TO CONTACT:**

The following is the transcription of a tape-recorded interview conducted by DETECTIVE SAUNDERS, P# 6026, LVMPD SEXUAL ASSAULT Detail, on May 30, 2008 at 0651 hours.

Q. Hello operator, this is detective M. Saunders, S-A-U-N-D-E-R-S, uh conducting one taped interview reference event number 080516-1021. Um, this interview is taking place at Centennial Hills Hospital at 6900 North Durango, Las Vegas,

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

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Nevada 89149. The date is the 30<sup>th</sup> of May, 2008, at approximately 0651 hours.

Present for this interview last name of Goodhart, G-O-O-D-H-A-R-T, first name of Karen, KAREN. Her date of birth is 07-12 of 59. She has a work phone number of 629-1211. Is that information true and correct?

A. Correct.

Q. Okay. Is it alright if I call you Karen?

A. Yes.

Q. Okay. Um Karen, I wanted uh direct your attention back to an incident that occurred on the 16<sup>th</sup> of May. Um, involving another nurse that you were on shift with by the name, or is he the CNA?

A. CNA, yes.

Q. CNA. Yes, by the name of Steven Farmer. Do you know who I'm referring to?

A. Correct, yes.

Q. Okay. Um, on the morning in question uh, you're aware that uh Steven had been arrested for um, for uh sexual assaulting a patient. And that patient uh, her name was Roxanne Cagnina.

A. Right.

Q. Is that correct?

A. Yes.

LVMPD0158

PA3153

**CONFIDENTIAL**

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

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Q. Okay. Did you have um, were you working with Steven on that morning and also helping give care to Roxanne?

A. I was taking care of Roxanne. Steven came in to transport the patient. He checked in on the patient every now and then. But basically I did the major portion of her care.

Q. Okay. And she came in for B

A. Seizures.

Q. Seizures. Okay. And she was, I take it she was given more medication while she was here and everything else was \_\_\_\_?

A. Correct.

Q. Okay. When, do you remember what time it was when Steven actually removed or took her from the ER area up to the seventh floor?

A. No, I would have to look at the chart to refer back to the time that I wrote for the transfer.

Q. Okay.

A. I know that it was before seven A.M.

Q. It was before seven A.M. huh? Okay.

A. I can tell you that much.

Q. Okay. If we needed to look at those charts, are they still available?

A. I believe they would be in Medical Records.

LVMPD0159

PA3154

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 4

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

Q. They=d be at medicalB

A. Bas far as I=m, as far as I know, IB

Q. Okay. Um, when Mr. Farmer took her upstairs um, how long, how long is an average trip to take somebody from the ER to a room and to come back, on average?

A. I average probably ten to fifteen minutes.

Q. Okay. And on this particular morning, was, how long do you think Mr. Farmer was gone for?

A. It seemed like he was gone for a long period of time, thirty to forty minutes, maybe. Maybe even longer. This is, uh, I, he did not come back down until close to seven o'clock.

Q. You think it was close to se, okayB

A. Because I had, I know I had set it up somewhere between five-thirty and six-thirty and I sent her up. Like I said for the exact time, I really don=t know.

Q. Okay. And, it just seemed to be quite a while?

A. It, it just seemed to be quite a long time.

Q. Okay.

A. I saidB

Q. Is that unusual?

LVMPD0160

PA3155

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

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

A. It can be. For the most part, if the patient=s awake and alert and they=re able to move themselves and get to whoever upstairs and into the room , as far as I know from other transports that I have been on here in this facility since, and I=ve been watching Peter move these patients up and he=s back down in a flash. It=s like I haven=t seen any issues.

Q. How is Mrs. Cagnina=s um, did she have any motor skills that would be able to assist him in helping herself moved from a Gurney to a bed?

A. She would have been very sleepy but her motor skills should have been fine. She did have pain medication prior to going up that would have made her very drowsy.

Q. Okay. Have you ever heard of any allegations or have you ever seen anything that has caused you concern or maybe cause concerning working with Mr. Farmer in the past?

A. No because I=ve only been, I=m very new at this facility, so basically that was my first day, first time ever you know, being in his presence.

Q. Okay.

A. I don=t, would not have known him.

Q. Got ya. Um, how=s Mr. Farmer=s um, what was his personality, I mean was he gruff, was he polite, was heB

LVMPD0161

**CONFIDENTIAL**

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

**EVENT #: 080516-1021**

**STATEMENT OF: KAREN GOODHART**

- A. Very polite, very nice gentleman. From what everybody else told me he was very gentle and caring and that=s what I was told. It=s like and very, wanted to make sure he was in there doing his job and let him know if we needed anything.
- Q. Okay. So he took her, you think it was some time five-thirty, six-ish (both talking) you think. I know it=s been several weeks (both talking).
- A. Yeah, really oh I couldn=t even told you that morning what time I sent her up.
- Q. Okay. You just remember sending her up and that he was gone and it seemed to be an extended period of time?
- A. Correct.
- Q. Um, when he came back down, did he say anything?
- A. Just that um, she was sleeping, he had to wake her up and it took him a while he needed to find an IV pole and trying to get the nurse into the room.
- Q. Okay. And did he say which nurse he was trying to get in to the room?
- A. No. Just the, it would have been the primary care nurse for that floor, that shift.  
>Cause it still would have been night shift nurses up on the ninth floor, \_\_\_\_ floor \_\_\_\_.
- Q. Okay. Is that, okay, so nurses are already up there on the floor. Is it, is it uncommon for the nurses for him to have to actually go locate a nurse to let them know that he needed, he needs them in the room?

LVMPD0162

PA3157

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 7

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

A. No that would not be uncommon. Most the time you would have to, you=d put the call light on wait.

Q. Mm-hmm.

A. Sometimes if they see you come up, they will be there or whatever but most the time you=d have to get their attention.

Q. Okay.

A. Go find them. And they, you know, they could be in the room. I=am not sure what their nurse to patient ratios are upstairs and how many nurses they have, soB

Q. Okay, um, so when you came back downstairs everything just seemed fine, other than the fact that he was gone, it seemed to be for an extended period?

A. Yeah, right.

Q. Okay. Make any comments to anything?

A. That just, that he had to wake her up and stuff.

Q. Okay.

A. >Cause she was quite comfortable when she went upstairs.

Q. Did um, when did you first hear about the allegations?

A. At, whatever time in the morning you guys called me.

Q. Well, when I first called you and left a message?

A. Yes. Yes.

LVMPD0163

PA3158

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 8

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- Q. Okay. So it was ten-thirty, eleven in the morning I think, somewhere in thereB
- A. Yeah. That=s B
- Q. I left a message. Okay.
- A. No actually I had talked to you >cause the phone was at the head of the bed. So, but it was, so somebody called and the phone rang. No I guess it, >cause my husband did, I think there was a second call or something.
- Q. I think I called your CB, uh I had two different phone numbers for you, I called one (both talking)B
- A. One on the cellB
- A. Okay. The first, the home phone when you called, that=s when.
- Q. Okay.
- A. Yeah, the cell phone I leave out of the room.
- Q. Okay. Did um, have you ever heard or did anybody ever tell you about any other um, inappropriate things that Mr. Farmer=s ever done?
- A. No sir.
- Q. Ever had any other complaints?
- A. No.
- Q. Okay. Is there anything else you can think of that might be beneficial to me with my investigation as far as uhB

LVMPD0164

PA3159



LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 9

CONFIDENTIAL

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

A. No because it=s like I didn=t even let him, like when I had her use the bed side commode and the bedpan, I took care of that because I=m not gonna let a male when I got time to do it.

Q. I understand.

A. So, you know, he wasn=t going in the room except for um, I took her off the monitor and he said that was his job to take her off the monitor. But you know, I, as like well I already got it. Like, that=s what I do.

Q. Right. >Cause you=re the primary nurse and he=s more the assistant.

A. Just \_\_\_\_ for the most-part, they do. They take them off the monitor=s themselves and roll them upstairs.

Q. Did he seem upset by that?

A. Yes, maybe it was a little \_\_\_\_ that was his job to do that. You know he was, to take care of everything and it=s like, I=m

Q. Okay.

A. I=m a primary care nurse. I don=t, I=m not used to anybody doing something else.

Q. Working your patient?

A. Right.

Q. You take care of your

LVMPD0165

PA3160

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 10

**CONFIDENTIAL**

EVENT #: 080516-1021

STATEMENT OF: KAREN GOODHART

- A. I take care of my patient.
- Q. Got ya. Okay, um, so you found that a little odd that he would be so direct about the IV thing?
- A. Maybe a little bit but you know, nothing that I would B
- Q. Nothing that, hind sight is twenty-twenty of course, but at the time?
- A. At the time, no.
- Q. Okay, alright. Um, anything else you can think of?
- A. No.
- Q. Okay. Operator, this will end the interview. The time is approximately seven o'clock on the 30<sup>th</sup> of May. Same people present. Same location. Thank you.

---

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE 30<sup>TH</sup> DAY OF MAY, 2008 AT 0700 HOURS.

MS:lc

LVMPD0166

PA3161

**CONFIDENTIAL**

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

EVENT #:080516-1021

**SPECIFIC CRIME: SEXUAL ASSAULT; OPEN AND GROSS LEWDNESS**

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: MURRAY, CHRISTINE

|                |                                               |                    |              |
|----------------|-----------------------------------------------|--------------------|--------------|
| DOB:           |                                               | SOCIAL SECURITY #: |              |
| RACE:          |                                               | SEX:               | Female       |
| HEIGHT:        |                                               | WEIGHT:            |              |
| HAIR:          |                                               | EYES:              |              |
| WORK SCHEDULE: |                                               | DAYS OFF:          |              |
| HOME ADDRESS:  | 3350 N. Durango #1120 Las Vegas, Nevada 89149 | HOME PHONE:        | 734-624-2755 |
| WORK ADDRESS:  |                                               | WORK PHONE:        |              |

BEST PLACE TO CONTACT:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by Detective M. Saunders, P# 6076, LVMPD Sexual Assault Detail, on 06/13/2008 at 0635 hours.

Q. Good morning, Operator, this is Detective M. Saunders, S-A-U-N-D-E-R-S. A conducting one taped interview reference event number 080516-1021. This interviews taking place at 6900 North Durango Las Vegas, Nevada 89149.

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

**CONFIDENTIAL**

EVENT #:080516-1021

STATEMENT OF: **MURRAY, CHRISTINE**

Centennial Hills Hospital, sixth floor, um, nurse, nurses supervisors room. A it is approximately 0635 hours on the thirteenth of June, 2008. Present for this interview um, last name of Murray, M-U-R-R-A-Y, first name of Christine, C-H-R-I-S-T-I-N-E. Date of birth of 04-0 - or, 04/20/1950, a address of 3350 North Durango Drive #1, 120 Las Vegas, Nevada 89129. She has a contact phone number of 734- a 624-2755. Is that information true and correct?

A. Um-hum, yes it is.

Q. Okay. And is it alright if I call you Christine or -

A. Chris is fine.

Q. Chris is fine, okay.

A. Um-hum.

Q. Um, Chris, I=am here to speak to you about an ongoing investigation that I have um, a reference a CNA that a was arrested out of this hospital. Are, are you familiar with what I=am talking about?

A. Yes, I am.

Q. Okay. And do you know the name of that individual?

A. Yes.

Q. That CNA?

A. Steve Farmers.

LVMPD0168

PA3163

**CONFIDENTIAL**

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

**EVENT #:080516-1021**

**STATEMENT OF: MURRAY, CHRISTINE**

Q. Okay. And I wanna direct your attention back to the sixteenth of May, a 2008.

Were you working that night?

A. Yes, I was.

Q. In which capacity were you working?

A. Registered nurse.

Q. Okay.

A. On the seventh floor.

Q. On the seventh floor. And that, that particular morning did you have a patient brought up from the ER by the name of Roxanne Cagnina (phonetic)?

A. Yes, I did.

Q. Okay, and do you remember, by chance, what room number she went into?

A. I believe it was 727.

Q. 727, okay, it could of been 725?

A. Yes.

Q. Okay, 725, okay. Um, when she was brought up, um, can you, can you explain to me the, the details um, of the first time that you had contact with her. As, as best you remember.

A. With her?

Q. Well, yes, we=ll, we=ll get back to Mr. Farmer.

A. Okay.

LVMPD0169

PA3164

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 4**

**EVENT #:080516-1021**

**STATEMENT OF: MURRAY, CHRISTINE**

Q. But we just, like what time was she brought up to the floor, that you remember?

A. She came up to the floor about four-twenty. The first that I saw her was when myself and the CNA, Corrine, walked in. We had been told that she had, had seizures. So we wanted to pad the bed rails. We found um, Mr. Farmer, walking her into the bathroom. We said, we would take it from there and he left immediately. And we walked her back, back to the bedroom. Back a, to the bed, after.

Q. Okay. Did she say anything to you after Mr. Farmer left? Did she appear distraught, distressed, anything?

A. She seemed confused. A when somebody has a lot of a drugs in them -

Q. Um-hum.

A. -a like that. Um, she did say, when we were walking her back, from the bathroom to the bed, are, is it all girls here? And we said, yes. And she said, oh good, I wanna pull my gown this way so when I sit down, I don=t choke myself. Which a lot of people do.

Q. Okay.

A. And so we said, oh yes, it=s all girls here, you go right ahead. And she did and then she got into bed.

LVMPD0170

PA3165

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

**VOLUNTARY STATEMENT**

PAGE 5

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

Q. Okay. Um, when she was first brought, you say she got in, in about four-twenty. Was that the first time you physically saw her or did you see him like coming off the elevator with her at four-twenty?

A. No, that was the first time I saw her, in her room, was the first time I saw her.

Q. Okay. Saw her, okay. And how did you know that she was a put into her room? She was brought-

A. Because - well, I was standing in another patients room, speaking to the family members.

Q. Um-hum.

A. Mr. Farmer came into the other patients room and told me that the patient he had just brought up and put in a room twenty-five was um, on a lot of drugs, pain killers and such and that she was kinda loopy and that she wouldn't notice if I didn't come right over there to see her.

Q. Okay. And is that common? Has he, has he ever -

A. I -

Q. - done something like that before?

A. I had never had him do that before.

Q. Okay, and how long would you say, I know you didn't work directly with him, but how often, a how long have Mr. Farmer - had you seen Mr. Farmer at the hospital?

LVMPD0171

PA3166

**CONFIDENTIAL**

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

**VOLUNTARY STATEMENT**

PAGE 6

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

A. I=d say for at least two months on and off, you know, cause we work different days but I=d seen him around quite a bit.

Q. Right. Okay, so he=d been there awhile?

A. Yea.

Q. And that was the first time he ever made a comment to you like that about a -

A. Yes.

Q. -a patient.

A. Yes.

Q. Okay, did you find that odd?

A. I found that strange, first of all, cause their not supposed to just walk into another patients room. You=re not supposed to walk into a patients room unless you have business in there. And he didn=t have business in there, he could of told that to my charge nurse.

Q. Okay. Um, at um, okay and he told you \_\_\_\_\_ that, that she=s ready, ready to go be seen and then when you went in, um, in the room that=s when you found him about to take her to the bathroom and you guys -

A. He actually was walking her into the bathroom.

Q. Okay. Was she exposed in any way?

A. No.

LVMPD0172

PA3167



LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 7

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

- Q. Okay. Um, and that was at, you said about four-twenty.
- A. Um-hum.
- Q. Okay.
- A. Yes.
- Q. And what time, do you, do you recall what time that you annotated on your notes, for arrival?
- A. A around a quarter to five.
- Q. Okay. And is, would this um, I= gonna show you this paper right here and it=s a - it=s a, looks like nurses notes.
- A. Um-hum.
- Q. It=s um, given to me by Centennial Hills. It says, 0445 a, patient to floor on stretcher. A vi., \_\_\_\_\_
- A. Vital signs stable.
- Q. Okay. Heavily sedated, needed assistance to walk to bathroom, stated my headache is still not gone.
- A. Um-hum.
- Q. Okay. Alright. Now, did she disclose or she say anything to you at that time about anything that a, a might of happened to her or occurred?
- A. No.
- Q. And did she seem distressed or scared?

LVMPD0173

PA3168

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 8

**CONFIDENTIAL**

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

A. No, she seemed, the thing that she seemed the most was distress cause her headache. She had come in with a headache, she=d had it for a couple days. And that was the one thing, she said it doesn=t seem to matter what their, they=re giving me, it=s not getting rid of this headache.

Q. Okay. Alright. So, um, you had made a comment to me earlier that a - when you were \_\_\_\_\_ the gur..., the gurney was outside the door .

A. Um-hum.

Q. Can you explain that to me? What, what was the -

A. When he came to me and I finished talking to the patients.

Q. Um-hum.

A. The other patients and a it took me, I=d say, three to five minutes to finish up there and walk around where her room was.

Q. Um-hum.

A. It was on the other side. And I noticed his gurney was still there, which surprised me because our transport people usually bring the person up. Get them into the bed as quickly as possible, and then get back downstairs because we don=t have a lot of transporters and we, their usually called on their walkie talkies, like come on down. We=ve got somebody else to transport. So you usually don=t see a gurney and a trans..., and a transporter hanging around.

LVMPD0174

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 9

CONFIDENTIAL

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

Q. Okay.

A. So when we walked in and we saw him, and we said, we would take over from here - a Corrine and I, the CNA. He um, disappeared. He like grabbed the gurney and went.

Q. Okay. Cause normally he did, he wouldn't of even been there, he would of already -

A. Right, right, he would of gotten her into the bed, handed her the call light, and showed her how to use it, and been gone.

Q. Okay. And was that um, and that was at about, what time do you think, four-twenty?

A. Probably about, yea, around four-twenty.

Q. Okay. Um, lets see, \_\_\_\_\_. Um, as far as, well, \_\_\_\_\_ well, back to that. Did um, at about seven a.m, did you go and check on the patient again?

A. No, I had been in there around six-thirty. A I was trying to find out if she had had a seizure, I was trying to anticipate what her - um, her needs were for the next shift when they were coming on.

Q. Yea.

A. If she needed anymore medicine or if she could have anymore medicine. At about six-thirty, she seemed like she was kind of dozing off so, I didn't wanna interrupt

LVMPD0175

PA3170

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 10

**CONFIDENTIAL**

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

her. Cause sometimes sleep will get rid of the headache. So, I left her about six-thirty and I, I did not see - I was not looking toward her room.

Q. Okay.

A. The majority of my patients were on the other side.

Q. Okay.

A. So, I really didn't ch., I figured she had gone to sleep. We weren't gonna disturb her.

Q. Okay. Do you ever recall seeing Mr. Farmer back up on the floor, anytime between six-thirty, seven o'clock?

A. No, I do not.

Q. Okay.

A. But then I wasn't looking for him.

Q. Did, has any other nurses or anyone else said anything to you that they saw him at about seven o'clock, standing in her room?

A. No.

Q. Walked in on, \_\_\_\_\_.

A. Nobody mentioned that to me.

Q. Okay. Um, did - when did you first find out about the allegations of that, the patient Roxanne Cagnina, had against Mr. Farmer?

LVMPD0176

PA3171

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 11**

**EVENT #:080516-1021**

**STATEMENT OF: MURRAY, CHRISTINE**

A. When I woke up the next day and there were a couple messages from you, on my phone, and I called you because of course, the first thing I thought was my daughters, my granddaughter.

Q. Okay.

A. Those were the things I thought because nobody had the courtesy from here, to call and say that something had happened and they had given you my telephone number. Which I was really upset about.

Q. Okay. You=re -

A. Not that I gave you the number -

Q. Right.

A. -but that they didn=t call me and tell me so I -

Q. That they didn=t bother to no..., notify you on -

A. Yea.

Q. -on what was happening.

A. Yea.

Q. Did um, okay. On a - did Ms. um, Cagnina, at any time, make any disclosures to you about anything that Mr. Farmer had done to her?

A. No, she did not.

Q. Okay. Alright. And can, what are - well let me, let me back up. You had made a comment earlier um, that he seemed to be very um, attentive.

LVMPD0177

PA3172

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 12**

**EVENT #:080516-1021**

**STATEMENT OF: MURRAY, CHRISTINE**

A. Um-hum.

Q. Can you, can you go over those details with me. What, what was it that you o..., you observed about um, Mr. Farmer?

A. Well, when he brought a patient up, if they had to have a \_\_\_\_\_ on, he would offer to put the \_\_\_\_\_ on. Which means of course, you know, behind the chest and a they have to go on the rib cages. So of course, on women it=s usually, you have to move the breast to put the, underneath the breast and stuff. He would always say, oh I=ll do that for you, you know, and you do what you have to do. He was always very complementary to everybody. He was always willing to do something extra if you wanted to. Very um, you know, just very helpful. He just wouldn=t -

Q. Did it seem to be more for female patients or any patient?

A. Actually, I think it was more for female patients.

Q. Okay, and when you say he had to put on the to..., \_\_\_\_\_ -

A. Um-hum.

Q. -how many, how many points of um, these, these leads?

A. There=s five leads.

Q. There=s five leads.

A. On our portable monitors, \_\_\_\_\_.

LVMPD0178

PA3173

**CONFIDENTIAL**

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 13**

**EVENT #:080516-1021**

**STATEMENT OF: MURRAY, CHRISTINE**

Q. And there=s, so one on basically on top of a, a below the clavicle -

A. Right here.

Q. -above, above the breast.

A. Yea, by the belly area here.

Q. And then two, one under each side of the breast -

A. Right.

Q. -and then one in between the breast.

A. Right.

Q. Okay. And he always seemed more than willing to -

A. Oh, I=ll put that on for you, yup.

Q. Did um, as far as his job, um, a is - where a CNA is concerned, does that normally does, when somebody puts on the \_\_\_\_\_, is that usually conduc..., um, completed by a nurse?

A. No, we do have the CNA=s do that.

Q. \_\_\_\_\_ (inaudible, both talking).

A. So, see that=s not really out of the realm of his responsibilities.

Q. Um-hum.

A. So, nobody thought anything of it.

LVMPD0179

PA3174

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 14

**CONFIDENTIAL**

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

Q. Okay. Would, does CNA duties change from floor to floor? Like if somebody, like would ER have their own set of, of things that CNA=s can do and things that they can=t as compared to a CNA that was assigned to a, a floor for recovery?

A. I think they would, yes.

Q. Okay.

A. I=m not positive.

Q. Um-hum.

A. Because I=ve never worked ER. Um, but I would think they would because that=s the first assessment is to \_\_\_\_\_ first everything that their coming in and their usually pretty serious down there.

Q. Oh, okay. Um, can you think of anything else that I didn=t ask you or I might not be aware of that you feels important, that might assist me in my investigation or something that I need to be made aware of?

A. The only thing I can think of like I said, is the older lady that he did the one to one sittings with.

Q. Um-hum.

A. Which means that the doctor ordered for somebody to be in the room with her at all times. He was in there, on the evening shift, it was dark because he has the lights out. The door was closed. Which usually for a one to one, I, if I had been the

LVMPD0180

PA3175



LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT  
PAGE 15

CONFIDENTIAL

EVENT #.080516-1021

STATEMENT OF: MURRAY, CHRISTINE

nurse, which I wasn't. I would want the door open. I wanna see what's going on. But we did hear her yelling. I don't want you by me, get outta here. And we thought, she's a little crazy.

Q. Um-hum.

A. She's a little crazy, old lady, that's why she has the sitter.

Q. Um-hum.

A. So we didn't put any credence into what she was saying.

Q. Okay. Do you remember when that occurred?

A. I don't.

Q. Okay. Before or after this incident, that we're talking about?

A. Before. Before.

Q. Okay. A couple of weeks, couple of days?

A. A it had to be more toward the beginning of when we opened up because it was on the sixth floor here and we didn't open the seventh floor until about two in a half, three months after we opened. So, obviously, it have to be probably in February or March, something like that.

Q. Okay. Do you remember what she was um, in for, what that victim -

A. I don't know.

Q. -or \_\_\_\_\_ the patient, \_\_\_\_\_.

LVMPD0181

PA3176

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**VOLUNTARY STATEMENT**  
PAGE 16

**CONFIDENTIAL**

EVENT #:080516-1021

STATEMENT OF: MURRAY, CHRISTINE

A. Cause I, you know what, I never had her as a patient.

Q. Okay.

A. So.

Q. Um, ever observe or see anything else that just didn=t seem right with you? A  
anything that Mr. Farmer ever did that was, a out of the scope or realm of his duties  
or anything else that just appeared - professional. From, from your professional  
opinion and, and your knowledge of the, the nursing field. Of something that he  
wasn=t doing that was correct with patients?

A. No. But you know what, I didn=t pay much attention to him.

Q. Okay. Alright. Is there anything else?

A. No.

Q. Okay. Operator, this will end the interview. The time is approximately 0649  
hours, on the 13<sup>th</sup> of June, 2008. Same people present, same location. Thank  
you.

---

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT 6900 N. DURANGO ON THE  
13<sup>th</sup> DAY OF JUNE, 2008 AT 0649 HOURS.**

MS:sl

LVMPD0182

PA3177

OCT 16 2012

**Forensic Case Report**

TO: Las Vegas Metropolitan Police Department  
Forensic Laboratory  
Attn: Ms. Kimberly Murga  
5605 W. Badura Ave, #120B  
Las Vegas, NV 89118

Offense: Sexual Assault

## Case Names:

Steven Dale Farmer - [Suspect]  
Roxanne Cagnina - [Victim]

**Evidence Received:**

| Sorenson Item # | Agency Item #   | Description                         |
|-----------------|-----------------|-------------------------------------|
| 1               | ACE#08031650-1D | Vaginal swabs                       |
| 2               | ACE#08031650-1F | Labial swabs                        |
| 3               | ACE#08031650-1E | Face swabs                          |
| 4               | ACE#08031650-1G | Reference - Roxanne Cagnina         |
| 5               | ACE#08031650-1A | Extract from breast swabs           |
| 6               | ACE#08031650-1B | Extract from thigh swabs            |
| 7               | ACE#08031650-1C | Extract from reagent blank          |
| 8               | 8177-1/1        | Right hand finger swabs from Farmer |
| 9               | 8177-1/2        | Left hand finger swabs from Farmer  |
| 10              | 8177-2/5        | Reference - Steven Farmer           |

**Results Conclusions and Opinions:****Item 1 (Vaginal swabs):**

No Y-STR DNA profile was obtained from this item.

**Item 2 (Labial swabs):**

A partial Y-STR DNA profile that is not suitable for comparison was obtained from this item.

**Item 3 (Face swabs):**

A complete mixture of Y-STR DNA profiles from two contributors was obtained from this item. The major Y-STR DNA profile obtained matches the Y-STR DNA profile obtained from Steven Farmer. Steven Farmer and his paternal relatives cannot be excluded as a source of the male DNA identified on this item. The major Y-STR DNA profile obtained was observed 4 times in a population of 13248 individuals. Applying the 95% upper confidence interval results in a frequency of 0.00068, which is equivalent to approximately 1 in every 1471 individuals. The minor Y-STR DNA profile is attributable to an unknown male and is suitable for comparison.

**Item 4 (Reference - Roxanne Cagnina):**

A complete DNA profile that genetically types as female was obtained from this item.

**Date: October 9, 2012**

**CONFIDENTIAL**

**Item 5 (Extract from breast swabs):**

A partial Y-STR DNA profile that is not suitable for comparison was obtained from this item.

**Item 6 (Extract from thigh swabs):**

A partial mixture of Y-STR DNA profiles from two contributors was obtained from this item. Due to the inability to provide statistical calculations no comparison can be made at this time.

**Item 7 (Extract from reagent blank):**

No Y-STR DNA profile was obtained from this item.

**Item 8 (Right hand finger swabs from Farmer):**

A complete DNA profile that matches the DNA profile obtained from Steven Farmer was obtained from this item.

**Item 9 (Left hand finger swabs from Farmer):**

A complete DNA profile that matches the DNA profile obtained from Steven Farmer was obtained from this item. Analysis for the presence of additional contributors was inconclusive.

**Item 10 (Reference - Steven Farmer):**

A complete DNA profile that genetically types as male was obtained from this item. A complete Y-STR DNA profile was also obtained from this item.

**Notes:**

Las Vegas Metropolitan Police Department Forensic Laboratory requirements were used in the interpretation of the results, per client request.

All submitted items, slides and DNA extracts generated during the course of examination will be returned to the submitting agency.

Should a suspect (and/or elimination standards) become available, known reference standards (oral/buccal swabs) should be obtained and submitted to Sorenson Forensics for further comparison.

Inconclusive DNA results indicate that possible allelic activity was observed below the laboratory's analytical threshold or that portions of the DNA profile appear at such low levels that no conclusions can be drawn as to the source.

The DNA extracted from the items listed above was amplified using the Polymerase Chain Reaction (PCR) and typed at the loci D8S1179, D21S11, D7S820, CSF1PO, D3S1358, TH01, D13S317, D16S539, D2S1338, D19S433, vWA, TPOX, D18S51, Amelogenin, D5S818, and FGA using the Identifiler® Plus PCR Amplification and STR Typing Kit.

The DNA extracted from the items listed above was amplified using the Polymerase Chain Reaction (PCR) and typed at the loci DYS456, DYS389(I), DYS390, DYS389(II), DYS458, DYS19, DYS385, DYS393, DYS391, DYS439, DYS635, DYS392, GATA H4, DYS437, DYS438, and DYS448 using the Y-filer® PCR Amplification and Y-STR Typing Kit.

The haplotype profile frequencies are calculated using the counting method. The US Y-STR Database located at <http://www.usystrdatabase.org/> was utilized to determine the profile frequency. The following ethnic classifications were included in this population database: African American, Asian, Caucasian, Hispanic and Native American.

Date: October 9, 2012

Sorenson Case#: SF004140

Client Case #: C245739 080516-1021

**CONFIDENTIAL**

Y-STR profiles within a paternal lineage are typically identical. Thus, any Y-STR DNA profile developed in this case would likely include paternal relatives.

Respectfully submitted,



Emily Jeskie

Forensic DNA Analyst II

LAS VEGAS METROPOLITAN POLICE

## PROPERTY WITHDRAWAL RECEIPT

PAGE 1

DATE 06-13-2012









TIME 01:34:04 PM

PROPERTY BUREAU

## ITEM INFORMATION

## DESCRIPTION

CONFIDENTIAL  
\$0.00

|                                       |                                           |                                                                                                                                                           |        |
|---------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1A<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT JM-111 FROM BREAST<br>SWAB IN S/AKIT OF ROXANNE CAGNINA | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1B<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT JM-112 FROM THIGH<br>SWAB IN S/AKIT OF ROXANNE CAGNINA  | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1C<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT<br>RBQ - 120511-JM2                                     | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1D<br>Qty 1<br>Type UNCLASS<br>Flags | <br>VAGINAL SWABS FROM S/A KIT MARKED<br>KP1B1                          | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1E<br>Qty 1<br>Type UNCLASS<br>Flags | <br>FACE SWABS FROM S/A KIT MARKED<br>KP1C1                             | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1F<br>Qty 1<br>Type UNCLASS<br>Flags | <br>LABIAL SWABS FROM S/A KIT MARKED<br>KP1G                          | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1G<br>Qty 1<br>Type UNCLASS<br>Flags | <br>BUCCAL SWAB FOR CAGNINA FROM S/A<br>KIT MARKED KP1A               | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021 | Item 1H<br>Qty 1<br>Type UNCLASS<br>Flags | <br>COPIES OF PAPERWORK FROM S/A KIT<br>FOR CAGNINA                   | \$0.00 |

RECEIVED FROM EVIDENCE CUSTODIAN  
REASON PROPERTY IS BEING REMOVED:EVID ANGELO MOORE, FOR (064028)  
Lab RequestTURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:

  
SORENSEN FORENSICS  
2495 SOUTH WEST TEMPLE • SALT LAKE CITY, UT 84115RANK:  
PR:  
AGENCY:

## INSTRUCTIONS:

Person removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the item(s) within 5 days.

sXOOTRcp

LVMPD0186

PA3181

LAS VEGAS METROPOLITAN POLICE




## PROPERTY WITHDRAWAL RECEIPT

PAGE 2

DATE 06-13-2012

TIME 01:34:04 PM

## PROPERTY BUREAU

| ITEM INFORMATION                        |                                          | DESCRIPTION                                                                                                                                                    | \$     |
|-----------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 1<br>Qty 2<br>Type UNCLASS<br>Flags | <br>RT HAND FINGER SWABS - STEVEN<br>FARMER<br>Pkg/Itm: 1/1<br>Sec Bg: 1/1   | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 2<br>Qty 2<br>Type UNCLASS<br>Flags | <br>LEFT HAND FINGER SWABS - STEVEN<br>FARMER<br>Pkg/Itm: 1/2<br>Sec Bg: 1/2 | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 5<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA BUCCAL SWAB KIT - STEVEN<br>FARMER<br>Pkg/Itm: 2/5<br>Sec Bg: 2/5    | \$0.00 |
| MONEY TOTAL                             |                                          |                                                                                                                                                                | \$0.00 |

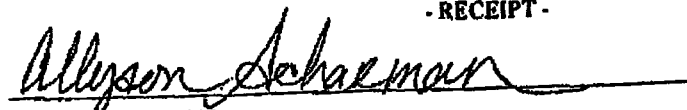
CONFIDENTIAL

RECEIVED FROM EVIDENCE CUSTODIAN EVID ANGELA MOORE, FOR (004028)  
REASON PROPERTY IS BEING REMOVED: Lab Request



TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:



SORENSEN FORENSICS  
2495 SOUTH WEST TEMPLE • SALT LAKE CITY, UT 84115



RANK:  
PW:  
AGENCY:

## INSTRUCTIONS:

Person removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the item(s) within 5 days.

eXOOTRep

LVMPD0187

PA3182





## PROPERTY WITHDRAWAL RECEIPT

PAGE 1

DATE 06-13-2012

TIME 01:09:13 PM

## PROPERTY BUREAU

| ITEM INFORMATION                        |                                          | DESCRIPTION                                                                                                                                                             | \$     |
|-----------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 1<br>Qty 2<br>Type UNCLASS<br>Flags | <br>RT HAND FINGER SWABS - STEVEN<br>FARMER<br>Pkg/itm: 1/1<br>Sec Bg: 1/1            | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 2<br>Qty 2<br>Type UNCLASS<br>Flags | <br>LEFT HAND FINGER SWABS - STEVEN<br>FARMER<br>Pkg/itm: 1/2<br>Sec Bg: 1/2          | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 3<br>Qty 1<br>Type UNCLASS<br>Flags | <br>RIGHT HAND FINGERNAIL SCRAPINGS -<br>STEVEN FARMER<br>Pkg/itm: 1/3<br>Sec Bg: 1/3 | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 4<br>Qty 1<br>Type UNCLASS<br>Flags | <br>LEFT HAND FINGERNAIL SCRAPINGS -<br>STEVEN FARMER<br>Pkg/itm: 1/4<br>Sec Bg: 1/4  | \$0.00 |
| MONEY TOTAL                             |                                          |                                                                                                                                                                         | \$0.00 |

CONFIDENTIAL

RECEIVED FROM EVIDENCE CUSTODIAN: EVID ANGELA MOORE, FOR [004028]

REASON PROPERTY IS BEING REMOVED: Furtherance of investigation

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

EVID ANGELA MOORE, FOR [004028]

TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RANK: \_\_\_\_\_ P#: \_\_\_\_\_ AGENCY: \_\_\_\_\_

STREET: \_\_\_\_\_ CITY: \_\_\_\_\_ ST: \_\_\_\_\_ ZIP: \_\_\_\_\_

## INSTRUCTIONS:

Persons removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the item(s) within 5 days.

LVMPD0188

rXOPORcp

PA3183









**PROPERTY WITHDRAWAL RECEIPT**

PAGE 1

DATE 06-12-2012

TIME 08:38:51 AM

**PROPERTY BUREAU**

| ITEM INFORMATION                        |                                           | DESCRIPTION                                                                                                                                                                                    | \$     |
|-----------------------------------------|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1<br>Qty 1<br>Type UNCLASS<br>Flags  | <br>SEXUAL ASSAULT KIT CAGNINA,<br>ROXANNE                                                                   | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1A<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT JM-III FROM BREAST<br>SWAB IN S/AKIT OF ROXANNE CAGNINA                                      | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1B<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT JM-III FROM THIGH<br>SWAB IN S/AKIT OF ROXANNE CAGNINA                                       | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1C<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT<br>RBQ - 120511-JM2                                                                          | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 5A<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT JM-2 FROM BUCCAL<br>SWAB KIT OF STEVEN FARMER<br>Pkg/itm: 2/5<br>Sec Bg: 2/5                 | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 5B<br>Qty 1<br>Type UNCLASS<br>Flags | <br>DNA EXTRACT OF RBK - 120711-JM FROM<br>BUCCAL SWAB KIT OF STEVEN FARMER<br>Pkg/itm: 2/5<br>Sec Bg: 2/5 | \$0.00 |

MONEY TOTAL \$0.00

RECEIVED FROM EVIDENCE CUSTODIAN: EVID ANGELA MOORE, FOR [004028]

REASON PROPERTY IS BEING REMOVED: Furtherance of investigation

OFFICER RECEIVING ITEMS

SIGNATURE:

EVID ANGELA MOORE, FOR [004028]

PHOTO: No

TURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RANK: \_\_\_\_\_ P#: \_\_\_\_\_ AGENCY: \_\_\_\_\_

STREET: \_\_\_\_\_ CITY: \_\_\_\_\_ ST: \_\_\_\_\_ ZIP: \_\_\_\_\_

**INSTRUCTIONS:**







Person removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the item(s) within 5 days.

LVMPD0189

XOPORep

PA3184

## PROPERTY BUREAU

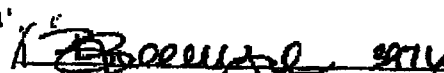
| ITEM INFORMATION                        |                                                 | DESCRIPTION                                                                                                                                                                                     | \$     |
|-----------------------------------------|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1<br>Qty 1<br>Type Miscellaneous<br>Flags  | <br>SEXUAL ASSAULT KIT CAGNINA,<br>ROXANNE                                                                    | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1A<br>Qty 1<br>Type Miscellaneous<br>Flags | <br>DNA EXTRACT JM-III FROM BREAST<br>SWAB IN S/AKIT OF ROXANNE CAGNINA                                       | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1B<br>Qty 1<br>Type Miscellaneous<br>Flags | <br>DNA EXTRACT JM -II2 FROM THIGH<br>SWAB IN S/AKIT OF ROXANNE CAGNINA                                       | \$0.00 |
| AC# 08031650<br>CS#<br>EV# 0805161021   | Item 1C<br>Qty 1<br>Type Miscellaneous<br>Flags | <br>DNA EXTRACT<br>RBQ - I20511-JM2                                                                           | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 5A<br>Qty 1<br>Type Miscellaneous<br>Flags | <br>DNA EXTRACT JM -2 FROM BUCCAL<br>SWAB KIT OF STEVEN FARMER<br>Pkg/Item: 2/5<br>Sec Bg: 2/5                | \$0.00 |
| AC# 08031765<br>CS# F<br>EV# 0805161021 | Item 5B<br>Qty 1<br>Type Miscellaneous<br>Flags | <br>DNA EXTRACT OF RBK - I20711-JM FROM<br>BUCCAL SWAB KIT OF STEVEN FARMER<br>Pkg/Item: 2/5<br>Sec Bg: 2/5 | \$0.00 |

MONEY TOTAL

\$0.00

RECEIVED FROM EVIDENCE CUSTODIAN  
REASON PROPERTY IS BEING REMOVED:EVID HARRARA LAMOUREUX, FOR J003108]  
Lab RequestTURNED OVER TO COURT, CITIZEN, DISTRICT  
- RECEIPT -

SIGNATURE:

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

## INSTRUCTIONS:

Person removing item(s) will either return the item(s) or return an executed copy of the receipt bearing the signature and identification of the individual receiving the item(s) within 5 days.

LVMPD0190  
XOOTRep

**CASE NO.**

---

**IN THE  
SUPREME COURT OF NEVADA**

---

Electronically Filed  
Aug 17 2016 08:58 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 XV of XVII**

---

---

DENNIS L. KENNEDY,

NEV. BAR NO. 1462

JOSEPH A. LIEBMAN,

NEV. BAR NO. 10125

JOSHUA P. GILMORE,

NEV. BAR. NO. 11576

**BAILEY ♦ KENNEDY**

8984 SPANISH RIDGE AVENUE

LAS VEGAS, NEVADA 89148

TELEPHONE: (702) 562-8820

FACSIMILE: (702) 562-8821

DKENNEDY@BAILEYKENNEDY.COM

JLIEBMAN@BAILEYKENNEDY.COM

JGILMORE@BAILEYKENNEDY.COM

MICHAEL E. PRANGLE,

NEV. BAR NO. 8619

KENNETH M. WEBSTER,

NEV. BAR NO. 7205

JOHN F. BEMIS,

NEV. BAR NO. 9509

**HALL PRANGLE & SCHOONVELD,  
LLC**

1160 N. TOWN CENTER DRIVE, STE. 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702.889.6400

FACSIMILE: 702.384.6025

MPRANGLE@HPSLAW.COM

KWEBSTER@HPSLAW.COM

JBEMIS@HPSLAW.COM

*Attorneys for Petitioners*

**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

**VOLUME XV of XVII**

**TABLE OF CONTENTS**

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

## **APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**

### **ALPHABETICAL INDEX**

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                      | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Amended Complaint filed August 21, 2009                                                                                                                                                                                                                                                            | I                         | 2                      | PA0007-PA0012            |
| Complaint filed July 23, 2009                                                                                                                                                                                                                                                                      | I                         | 1                      | PA0001-PA0006            |
| Defendant American Nursing Services, Inc.'s Joinder to Plaintiff's Opposition to Defendants Valley Health System LLC d/b/a Centennial Hills Hospital Medical Center and Universal Health Services, Inc.'s Motion for Reconsideration of this Court's November 4, 2015 Order filed December 4, 2015 | X                         | 27                     | PA1822-PA1824            |
| Defendant Steven Dale Farmer's Limited Opposition to Plaintiff's Motion for Summary Judgment Re: Liability filed October 13, 2014                                                                                                                                                                  | I                         | 5                      | PA0094-PA0098            |
| 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                      | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| 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            |



| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                                  | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                   | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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                   |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                               | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                                                                                                                                                     | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's Exhibit 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            |

| <b><u>Document Title:</u></b>                                                                                                                                                                                                                | <b><u>Volume No.:</u></b> | <b><u>Tab No.:</u></b> | <b><u>Page Nos.:</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Plaintiff's 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 70



| Page 1 |                                                | Page 3 |                                   |
|--------|------------------------------------------------|--------|-----------------------------------|
| 1      | DISTRICT COURT                                 | 1      | APPEARANCES OF COUNSEL (Cont'd)   |
| 2      | CLARK COUNTY, NEVADA                           | 2      |                                   |
| 3      | JANE DOE,                                      | 3      | For Defendant Farmer:             |
| 4      | Plaintiff,                                     | 4      | CARROLL, KELLY, TROTTER, FRANZEN, |
| 5      | vs.                                            | 5      | McKENNA & PEABODY                 |
|        | CASE NO. 09-A-595780                           | 6      | HEATHER S. HALL, ESQ.             |
| 6      | VALLEY HEALTH SYSTEM LLC,                      | 7      | Suite 260                         |
| 7      | a Nevada limited                               | 8      | 8329 W. Sunset Road               |
| 8      | liability company, d/b/a                       | 9      | Las Vegas, Nevada 89113           |
| 9      | CENTENNIAL HILLS HOSPITAL                      | 10     | 702.792.5855                      |
| 10     | MEDICAL CENTER; UNIVERSAL                      | 11     | 702.796.5855 Fax                  |
| 11     | HEALTH SERVICES, INC., a                       | 12     | hshall@cktfmlaw.com               |
| 12     | Delaware corporation;                          | 13     |                                   |
| 13     | AMERICAN NURSING                               | 14     |                                   |
| 14     | SERVICES, INC., a                              | 15     |                                   |
| 15     | Louisiana corporation;                         | 16     |                                   |
| 16     | STEVEN DALE FARMER, an                         | 17     |                                   |
| 17     | individual; DOES I                             | 18     |                                   |
| 18     | through X, inclusive; and                      | 19     |                                   |
| 19     | ROE CORPORATIONS I                             | 20     |                                   |
| 20     | through X, inclusive,                          | 21     |                                   |
| 21     | Defendants.                                    | 22     |                                   |
| 22     | ~~~~~                                          | 23     |                                   |
| 23     | DEPOSITION OF                                  | 24     |                                   |
| 24     | CHRISTINE MURRAY, RN                           | 25     |                                   |
| 25     | Thursday, January 8, 2015                      |        |                                   |
|        | 1:30 p.m.                                      |        |                                   |
|        | 521 S. Third Street                            |        |                                   |
|        | Las Vegas, Nevada                              |        |                                   |
|        | Carol O'Malley, CCR 178, RMR                   |        |                                   |
| Page 2 |                                                | Page 4 |                                   |
| 1      | APPEARANCES OF COUNSEL                         | 1      | INDEX OF EXAMINATION              |
| 2      |                                                | 2      |                                   |
| 3      | For Plaintiff:                                 | 3      | WITNESS: Christine Murray, RN     |
| 4      | KEACH MURDOCK                                  | 4      |                                   |
| 5      | ROBERT E. MURDOCK, ESQ.                        | 5      |                                   |
| 6      | 521 S. Third Street                            | 6      |                                   |
| 7      | Las Vegas, Nevada 89101                        | 7      |                                   |
| 8      | 702.685.6111                                   | 8      | EXAMINATION                       |
| 9      | 702.384.4570 Fax                               | 9      | PAGE                              |
| 10     | lasvegasjustice@aol.com                        | 10     | By Mr. Murdock                    |
| 11     | For Defendant Valley Health System LLC, d/b/a  | 11     | By Mr. Silvestri                  |
| 12     | Centennial Hills Hospital Medical Center:      | 12     | By Ms. Hall                       |
| 13     | HALL PRANGLE & SCHOONVELD, LLC                 | 13     |                                   |
| 14     | JOHN F. BEMIS, ESQ.                            | 14     |                                   |
| 15     | Suite 200                                      | 15     |                                   |
| 16     | 1160 N. Town Center Drive                      | 16     | INDEX TO EXHIBITS                 |
| 17     | Las Vegas, Nevada 89144                        | 17     |                                   |
| 18     | 702.889.6400                                   | 18     | EXHIBITS                          |
| 19     | 702.384.6025 Fax                               | 19     | MARKED                            |
| 20     | depo@hpslaw.com                                | 20     | 1 Diagram by deponent             |
| 21     | For Defendant American Nursing Services, Inc.: | 21     | 2 Voluntary Statement             |
| 22     | LEWIS BRISBOIS BISGAARD & SMITH LLP            | 22     |                                   |
| 23     | AMANDA J. BROOKHYSER, ESQ.                     | 23     |                                   |
| 24     | 6385 S. Rainbow Boulevard                      | 24     |                                   |
| 25     | Suite 600                                      | 25     |                                   |
|        | Las Vegas, Nevada 89118                        |        |                                   |
|        | 702.693.4320                                   |        |                                   |
|        | 702.893.3383                                   |        |                                   |
|        | 702.893.3789 Fax                               |        |                                   |
|        | amanda.brookhyser@lewisbrisbois.com            |        |                                   |
|        | PYATT & SILVESTRI                              |        |                                   |
|        | JAMES P.C. SILVESTRI, ESQ.                     |        |                                   |
|        | 701 Bridger Avenue                             |        |                                   |
|        | Las Vegas, Nevada 89101                        |        |                                   |
|        | 702.383.6000                                   |        |                                   |
|        | 702.477.0088                                   |        |                                   |
|        | jsilvestri@psh-law.com                         |        |                                   |



800.211.DEPO (3376)  
EsquireSolutions.com

Page 5

1 January 8, 2015  
2 (Prior to the commencement of the deposition,  
3 all of the parties present agreed to waive  
4 statements by the court reporter, pursuant to  
5 Rule 30(b)(4) of NRCP.)  
6  
7 CHRISTINE MURRAY, RN,  
8 having been first duly sworn, testified as follows:  
9  
10 EXAMINATION  
11 BY MR. MURDOCK:  
12 Q. Would you please state your name for the  
13 record?  
14 A. Christine Murray.  
15 Q. Ms. Murray, have you ever had your  
16 deposition taken before?  
17 A. Yes.  
18 Q. On how many occasions?  
19 A. Once.  
20 Q. My understanding is that was in the Cagnina  
21 matter?  
22 A. Yes.  
23 Q. I'm sure you were told in that deposition  
24 about the rules, but let me just go through them very  
25 briefly.

Page 6

1 You understand that the law of  
2 perjury applies here as it does in a court of law?  
3 A. Yes.  
4 Q. You understand that even though this is a  
5 very relaxed proceeding, you still have a duty to  
6 tell the truth?  
7 A. Yes.  
8 Q. You understand that I'm here to ask you  
9 questions; you're here to answer them. Do you  
10 understand that?  
11 A. Absolutely.  
12 Q. If you don't understand a question of mine  
13 today, please let me know. If you go ahead and  
14 answer the question, I'm going to assume that you  
15 understood it. Is that fair?  
16 A. Absolutely.  
17 Q. Is there any reason this deposition can't  
18 go forward today?  
19 A. Not to my knowledge.  
20 Q. In other words, have you taken any  
21 medication that may affect your memory or anything  
22 like that?  
23 A. No.  
24 Q. Ms. Murray, my understanding is that you  
25 are a nurse, is that correct?

Page 7

1 A. Yes.  
2 Q. Are you licensed in the State of Nevada?  
3 A. Yes, I am.  
4 Q. Are you employed?  
5 A. Yes.  
6 Q. Where are you employed?  
7 A. Harmon Hospital.  
8 Q. Is that a rehab center?  
9 A. It has just converted to a hospital.  
10 Q. Okay. How long have you worked there?  
11 A. Two years.  
12 Q. And what do you do there?  
13 A. I'm a staff nurse.  
14 Q. Do you have any particular specialization  
15 at Harmon?  
16 A. No.  
17 Q. In other words, are you an orthopedic  
18 nurse --  
19 A. No.  
20 Q. -- or anything like that?  
21 A. No.  
22 Q. And you said you've been working there  
23 about two years?  
24 A. Uh-huh.  
25 Q. Where did you work before then?

Page 8

1 A. I worked at Montevista.  
2 Q. And that's a psychiatric hospital?  
3 A. Yes.  
4 Q. And what did you do there?  
5 A. I was a charge nurse.  
6 Q. Do you have any background in nursing,  
7 outside of working for Montevista?  
8 A. Un-uhn.  
9 Q. Is that a no?  
10 A. No.  
11 Q. You have to answer verbally to my  
12 questions. You can't say "uh-huh" or "un-uhn" or  
13 shake your head, because the court reporter can't  
14 take that down. So at some point in the deposition  
15 myself or counsel may say to you, "Is that a yes,"  
16 or, "Is that a no?" We're not trying to yell at you.  
17 We're just trying to make sure the record is clear.  
18 Okay?  
19 A. Okay.  
20 Q. So you were a charge nurse at Montevista.  
21 For how long?  
22 A. A year and a half.  
23 Q. And why did you leave Montevista?  
24 A. I didn't care for it anymore.  
25 Q. Did you leave on your own?

Page 9

1 A. Yes.  
2 Q. Where did you work before Montevista?  
3 A. I worked at Kindred.  
4 Q. Is that a rehab place?  
5 A. That's rehabilitation and long-term care.  
6 Q. Which Kindred did you work at?  
7 A. It's been sold now, but it was on Maryland  
8 Parkway right off of Karen.  
9 Q. And what did you do there?  
10 A. I was a charge nurse.  
11 Q. And how long did you work there?  
12 A. I believe about almost two years.  
13 Q. And where did you work before Kindred?  
14 A. I was in North Carolina.  
15 Q. What did you do in North Carolina?  
16 A. I was a wound care nurse at a  
17 rehabilitation center.  
18 Q. Why did you leave Kindred?  
19 A. Kindred? It was too far to drive.  
20 Q. Okay. You left on your own?  
21 A. Uh-huh.  
22 Q. Is that a yes?  
23 A. Yes.  
24 Q. How long were you living in North Carolina?  
25 A. About a year and a half.

Page 10

1 Q. Did you work at the same place?  
2 A. Yes.  
3 Q. That entire time?  
4 A. Uh-huh.  
5 Q. Is that a yes?  
6 A. Yes.  
7 Q. And what was the name of the place?  
8 A. I can't remember. I really can't.  
9 Q. Okay. And why did you leave North  
10 Carolina?  
11 A. Well, I went to North Carolina because my  
12 sister lives there, and she was going through a  
13 divorce. Her children were in college, she was by  
14 herself on this farm, and she wanted somebody there.  
15 So when she got things straightened around I decided  
16 to come back because my children live here.  
17 Q. Where did you work before North Carolina?  
18 A. North Vista Hospital.  
19 Q. And what did you do there?  
20 A. I was a staff nurse.  
21 Q. How long did you work at North Vista?  
22 A. A year and a half.  
23 Q. And why did you leave North Vista?  
24 A. Actually I had a confrontation with a  
25 family, and so I thought it was better to leave and

Page 11

1 go to North Carolina.  
2 Q. Were you asked to leave North Vista?  
3 A. It was kind of like they wanted me to, so I  
4 gave them a letter of resignation.  
5 Q. Were you asked to resign, as opposed to  
6 being fired?  
7 A. Yes.  
8 Q. Was it one of those kinds of situations?  
9 A. Uh-huh.  
10 Q. Is that a yes?  
11 A. Yes.  
12 Q. What was the confrontation about, in  
13 general?  
14 A. It's kind of detailed. My patient had a  
15 sister who he claimed was a nurse. I was trying to  
16 explain something to him. I asked the sister to  
17 explain it to him, and he told me I was being rude to  
18 his sister.  
19 Q. Then I guess it kind of escalated, would be  
20 my guess?  
21 A. No, he just got really mad. Well, he was  
22 coming out of an alcoholic situation, and some other  
23 stuff, and just, you know --  
24 Q. Okay.  
25 A. I really shouldn't discuss that. I mean --

Page 12

1 Q. Well, I'm not asking for names.  
2 A. Okay. Well, all right. So the family  
3 didn't like it, so they said something about it, so  
4 then I got called into the office.  
5 Q. Who was your supervisor at the time? Do  
6 you remember?  
7 A. Sue. I don't remember her last name.  
8 Q. Is that the person whose office you went  
9 to?  
10 A. Yes.  
11 Q. And that's when it was kind of decided that  
12 you would resign, as opposed to being fired?  
13 A. Uh-huh.  
14 Q. Is that a yes?  
15 A. Yes.  
16 Q. Prior to North Vista where were you at?  
17 A. I was at Centennial Hills.  
18 Q. When did you start working at Centennial  
19 Hills?  
20 A. When it opened. I believe it was January  
21 of 2007 or 2008.  
22 Q. You're not sure which?  
23 A. I'm not sure which.  
24 Q. But nevertheless, when it opened, right?  
25 A. Yes.

Page 13

1 Q. I guess the people who start working there  
2 first say "they opened it." Were you one of those  
3 people that opened the hospital?  
4 A. Yes, I was.  
5 Q. Okay. And what did you do there at  
6 Centennial?  
7 A. I worked on the joint replacement as a  
8 staff nurse.  
9 Q. And what do you mean, you worked on the  
10 joint replacement?  
11 A. Joint replacement was for hips, knees,  
12 shoulders.  
13 Q. Was there a specific area of the hospital  
14 that was set aside for that?  
15 A. Yes. The 7th floor.  
16 Q. And were you only working with joint  
17 replacement patients?  
18 A. No. You never just work with one. I mean  
19 if there's an empty bed and they need a med-surg bed,  
20 they throw the med-surg patient in there. So you do  
21 both.  
22 Q. And do you recall how many beds the 7th  
23 floor was, approximately?  
24 A. 20, on the one-half. There was two halves.  
25 This was the only half that was open. This one was

Page 14

1 not.  
2 Q. Did they call it like north and south, or  
3 east and west, or something like that?  
4 A. Yes, they did. I think it was north and  
5 south.  
6 Q. So the north was open, the south was  
7 closed?  
8 A. Yes.  
9 Q. Okay. Was there a time that the south  
10 opened up while you were working there?  
11 A. Not while I was there, no.  
12 Q. And my understanding is you left the  
13 hospital after working there about six months, seven  
14 months, or something like that?  
15 A. No.  
16 Q. How long did you work there?  
17 A. I was there a little over a year.  
18 Q. Okay. So on the 7th floor there was about  
19 20 beds that were open, is that correct, while you  
20 were working there?  
21 A. Yes.  
22 Q. And do you recall how many nurses were  
23 working per shift, approximately?  
24 A. Four.  
25 Q. And when I say "nurses," I'm talking about

Page 15

1 RNs, for the most part.  
2 A. Yes.  
3 Q. You're an RN, right?  
4 A. Yes.  
5 Q. What were the duties of an RN at Centennial  
6 Hills back in -- well, when it opened?  
7 MR. SILVESTRI: Objection. Overbroad.  
8 MR. BEMIS: I object to form. She's  
9 not a 30(b)6 witness.  
10 To the extent that you do know,  
11 you can answer it.  
12 BY MR. MURDOCK:  
13 Q. Well, let me put it this way.  
14 What do you believe your duties  
15 were back in 2008, or when the hospital opened?  
16 A. You would assess your patient. You would  
17 give them their medications. You would do any wound  
18 care that was ordered by the doctor. And usually you  
19 would check on a patient between one and two hours,  
20 to check for pain medication, or to make sure that  
21 they were okay. Plus you do your charting. That's  
22 it.  
23 Q. When you say "give meds," would you also  
24 check IVs, things like that?  
25 A. Yes.

Page 16

1 Q. Were some of your patients hooked up to --  
2 is it called telemetry?  
3 A. Yes.  
4 Q. And is that like an EKG type thing?  
5 A. Yes.  
6 Q. And would you set the patient up for their  
7 telemetry or EKG stuff?  
8 MR. BEMIS: I object to form. It calls  
9 for speculation. Go ahead and answer, if you know.  
10 THE WITNESS: It would depend. They  
11 could come up from ER with it on. The doctor could  
12 order it after they had been there for awhile, and  
13 you would have to put it on. It would just depend.  
14 It was always different.  
15 BY MR. MURDOCK:  
16 Q. Sure. But if the doctor ordered it and you  
17 needed to put it on, is that something you, as an RN,  
18 would do?  
19 A. Yes.  
20 Q. Would anybody else be allowed to do that on  
21 the floor?  
22 A. They shouldn't.  
23 Q. Okay.  
24 A. That doesn't mean they didn't.  
25 Q. When you say "they" shouldn't, who are we

Page 17

1 talking about?  
2 A. Well, I mean --  
3 Q. In general.  
4 A. There are nursing students that might be on  
5 the floor, that could offer to do that.  
6 Q. What about CNAs?  
7 A. I would never let a CNA do that, no.  
8 Q. Why not?  
9 A. Because it's not within their scope of  
10 practice.  
11 Q. What does that mean?  
12 A. That means they're not trained to do it  
13 appropriately.  
14 Q. What does "scope of practice" mean?  
15 A. It means like I can't order a drug for a  
16 person, because it's not in my scope of practice.  
17 That's the doctors.  
18 Q. Sure. But you're certainly aware that  
19 CNAs -- or at least some CNAs did attach the  
20 telemetry leads at Centennial Hills?  
21 A. That would be if the nurse allowed it.  
22 Q. Sure. And I know you never did.  
23 A. No.  
24 Q. That's what you said. But were you aware  
25 that some did?

Page 18

1 A. Yes.  
2 Q. So what do you believe was within the scope  
3 of practice for CNAs?  
4 MR. BEMIS: I object to form. Outside  
5 the scope of her knowledge.  
6 MR. SILVESTRI: I'm just going to  
7 object to overbroad.  
8 MR. MURDOCK: Let me rephrase the  
9 question a little bit.  
10 BY MR. MURDOCK:  
11 Q. Would you ever order CNAs to do things, as  
12 part of your job?  
13 A. Yes.  
14 Q. What would you order them to do? What type  
15 of things would you order them to do?  
16 A. Help me turn a patient. Put a patient on  
17 or off a bedpan. Take patient water. Walk by a  
18 patient's room and see if they were okay. Give a  
19 patient a bath. Help take food trays to a patient,  
20 and feed a patient, if the patient needed assistance.  
21 Q. You said one thing that kind of piqued my  
22 curiosity a little bit.  
23 You said the CNA could walk by a  
24 patient's room to see if the patient was okay?  
25 A. Uh-huh.

Page 19

1 Q. Is that a yes?  
2 A. Yes.  
3 Q. What about entering the patient's room to  
4 see if the patient was okay?  
5 A. Well, most of the rooms that have a patient  
6 that is in danger of falling have a star on the side  
7 of the door. So you can stick your head in and make  
8 sure that they're still in their bed. That's all  
9 that you would ask a CNA to do.  
10 Q. But a CNA could also give the patient a  
11 bath?  
12 A. Yes.  
13 Q. The CNA could put a patient on and off a  
14 bedpan?  
15 A. Absolutely.  
16 Q. What does that mean?  
17 A. What do you mean?  
18 Q. I know it sounds like a stupid question,  
19 but what I'm asking is, how does one go about putting  
20 someone on and off a bedpan?  
21 A. You roll the patient over, you slide the  
22 bedpan under, you roll the patient back, you put the  
23 head up a little bit. Then you give them their call  
24 light, so when they're done you can come back and  
25 roll them back, take it off, clean them up, and then

Page 20

1 roll them back to their position.  
2 Q. What do you mean by "clean up?"  
3 A. Wash them.  
4 Q. Where?  
5 A. On their backside.  
6 Q. Anus?  
7 A. Yes.  
8 Q. Vagina?  
9 A. Yeah.  
10 Q. Or penis?  
11 A. Wherever is dirty.  
12 Q. So that's something the CNA was certainly  
13 allowed to do, right?  
14 A. Absolutely.  
15 Q. Now, prior to working at Centennial, where  
16 did you work?  
17 A. St. Rose.  
18 Q. How long did you work there?  
19 A. A year and a half.  
20 Q. Why did you leave St. Rose?  
21 A. Because when I signed up with St. Rose they  
22 were building the southwest campus, and they told me  
23 that I would be able to go there.  
24 I was living in Centennial Hills,  
25 I was driving all the way over to Henderson. I was

Page 21

1 there a year and a half, and every time I put in for  
2 a transfer they said they didn't have a spot. So  
3 when Centennial Hills was opening, I went there.  
4 Q. Sure. Now, how long have you been a nurse?  
5 A. Eleven years.  
6 Q. What did you do before you were a nurse?  
7 A. I owned a store.  
8 Q. What kind of store?  
9 A. A small grocery and party store.  
10 Q. Where?  
11 A. Detroit.  
12 Q. How long did you own the store?  
13 A. Six years.  
14 Q. I assume you went to school to be a nurse?  
15 A. Yes.  
16 Q. Where did you go to school?  
17 A. Henry Ford Community College.  
18 Q. And how long did that take?  
19 A. About three and a half years.  
20 Q. Did you do that while you were running your  
21 store?  
22 A. No. I did that while I was a CNA.  
23 Q. So you were a CNA before you were a nurse?  
24 A. Yes.  
25 Q. And where were you a CNA?

Page 22

1 A. A lot of different places.  
2 Q. Can you give me the city?  
3 A. Detroit.  
4 Q. Detroit?  
5 A. Uh-huh.  
6 Q. And did the job of a CNA in Detroit differ  
7 much from the job of a CNA here in Las Vegas?  
8 MR. BEMIS: I object to form.  
9 THE WITNESS: No.  
10 BY MR. MURDOCK:  
11 Q. The same things? Washing the patients  
12 after they go on and off the bedpan, things like  
13 that?  
14 A. Yes.  
15 Q. What did you do before you had the party  
16 store?  
17 A. I was a housewife.  
18 Q. For how long?  
19 A. I don't know. About 12 years.  
20 Q. Are you married?  
21 A. Not anymore.  
22 Q. Divorced?  
23 A. Yes.  
24 Q. For how long?  
25 A. 22 years.

Page 23

1 Q. You said you have children?  
2 A. Yes.  
3 Q. What do they do?  
4 A. I have a son in Florida who is a manager  
5 for Office Max.  
6 Q. Okay.  
7 A. I have a daughter who lives here.  
8 Q. What does she do?  
9 A. She's a sales event manager for Three  
10 Square. I have another daughter who is going to  
11 school for a human resources degree.  
12 Q. She's here in Nevada, too?  
13 A. Yes.  
14 Q. She goes to UNLV?  
15 A. Yes.  
16 Q. When you applied to Centennial Hills to  
17 work there, how did you do that?  
18 A. I went online and filled out the  
19 application, and I got a call to come in for an  
20 interview.  
21 Q. How did you know they were looking for  
22 people?  
23 A. It was in the newspaper.  
24 Q. And did it say go to a certain website  
25 online, or something like that?

Page 24

1 A. Well, I knew they were building the  
2 hospital. I wanted to see if they were still hiring  
3 people, because it was close.  
4 Q. Sure. So when you went online, were you  
5 applying to Centennial Hills specifically or --  
6 A. Yes.  
7 Q. Let me just finish my question.  
8 A. Oh, okay.  
9 Q. -- or was it through the Valley Health  
10 System? Do you remember?  
11 A. No. I believe it was Centennial Hills  
12 specifically.  
13 Q. Do you remember seeing the letters UHS on  
14 the application?  
15 A. No, I don't remember.  
16 Q. Would it surprise you to learn that it was?  
17 A. No.  
18 Q. So you applied at Centennial Hills, you  
19 went online, and I guess they ask you questions about  
20 your past, and names, and all that kind of stuff?  
21 A. Yes.  
22 Q. And did they then call you in for like an  
23 interview, or something like that?  
24 A. Yes, they did.  
25 Q. Do you remember who interviewed you?

Page 25

1 A. No, I do not.  
2 Q. And after the interview were you offered a  
3 job?  
4 A. Yes, I was.  
5 Q. Or during the interview?  
6 A. Yes.  
7 Q. Was it during?  
8 A. No, it was after. I got a call.  
9 Q. And did they offer you the job as a staff  
10 nurse, a charge nurse? What did they offer you the  
11 job as?  
12 A. Staff nurse.  
13 Q. And did they tell you where you would be  
14 working?  
15 A. On the 7th floor.  
16 Q. And is that where you wanted to work?  
17 A. Yes. That was what I was familiar with.  
18 Q. That kind of population?  
19 A. Yes.  
20 Q. And you certainly didn't mind working with  
21 med-surg patients either?  
22 A. No.  
23 Q. So you got this job. Did you go through an  
24 orientation?  
25 A. Yes, we did.

Page 26

1 Q. You said, "Yes, we did." Who is "we?"  
2 A. Well, all of us.  
3 Q. Was it an orientation for everybody?  
4 A. Yes.  
5 Q. How many people?  
6 A. Probably about 20 to 25.  
7 Q. All nurses?  
8 A. Yes. Because the hospital wasn't open yet.  
9 Q. Do you recall when this was? In other  
10 words, if you started working in the hospital  
11 sometime in February, would it have been like a month  
12 earlier, or something like that?  
13 A. Yes. It was in January of that year.  
14 Q. That's when the orientation was?  
15 A. Yes.  
16 Q. Whatever year it opened, right?  
17 A. Yes.  
18 Q. Okay. So at the orientation were you given  
19 like an orientation packet?  
20 A. Yes.  
21 Q. What was in that packet, if you remember?  
22 A. A description of the job, what you were  
23 expected to do, your benefits, what was available,  
24 how much they cost, your pay schedule. What the  
25 hospital stood for, what their -- what's that

Page 27

1 called -- creed, or whatever it was.  
2 Q. What was the creed?  
3 A. I don't remember.  
4 Q. Okay. So you got this packet of stuff.  
5 Do you remember who paid you, by  
6 the way?  
7 A. Who paid me?  
8 Q. Yeah. Was it Centennial Hills? Was it  
9 Valley Health System, UHS?  
10 A. I really don't remember. I had it direct  
11 deposited, got my stub, and I don't know.  
12 Q. Were you allowed to keep those materials?  
13 A. Yes.  
14 Q. At some point did you throw them out?  
15 A. I assume, yes.  
16 Q. And how long did the orientation last?  
17 A. It lasted about a week and a half.  
18 Q. After that week and a half did the hospital  
19 open?  
20 A. No. It didn't open for about another week.  
21 Q. So you kind of like had a week's vacation  
22 in between?  
23 A. Yes.  
24 Q. Okay. And then the hospital opened, right?  
25 A. Yes.

Page 28

1 Q. Now, the day the hospital opened, was there  
2 all of a sudden an influx of hundreds of patients?  
3 A. No.  
4 Q. How did that work?  
5 A. They came in through the ER -- some of  
6 them. Some of them were brought in by doctors, sent  
7 by doctors.  
8 Q. And let me kind of interrupt you just for a  
9 second, and I apologize.  
10 You said you were working on like  
11 the joint replacement floor, and were there certain  
12 doctors who would admit to that floor?  
13 A. Yes.  
14 Q. Who were they?  
15 A. There was a Dr. Swan, I believe. God, I  
16 can't even remember their names. I really don't  
17 remember their names.  
18 Q. Okay. And I guess over time you met not  
19 just the nurses who you were working with, but also  
20 CNAs, orderlies?  
21 A. Yes.  
22 Q. Food service workers, thing like that,  
23 right?  
24 A. Yes.  
25 Q. Was there ever a time when you first opened

Page 29

1 where they got everybody together -- the hospital got  
2 nurses, CNAs, everybody, like in one big room and had  
3 a talk, or anything like that?  
4 A. No.  
5 Q. So on your first day at Centennial, I  
6 assume you got to the hospital, you parked, right?  
7 A. Yes.  
8 Q. My assumption is -- and tell me if I'm  
9 wrong -- that they have a special parking area for  
10 employees?  
11 A. Yes.  
12 Q. And when you go to that area, how do you  
13 get into that parking area?  
14 A. It was open.  
15 Q. It was open. Okay. Did you have a sticker  
16 on your car?  
17 A. Yes.  
18 Q. What did that sticker say? Do you  
19 remember?  
20 A. It just was a number, and that I was a  
21 Centennial Hills employee.  
22 Q. Were you given a badge?  
23 A. Yes.  
24 Q. And what was on the badge? Do you  
25 remember?

Page 30

1 A. Your name, what your position was, and then  
2 there was an encoded strip on the back, and a  
3 picture.  
4 Q. Now, when you first started working there,  
5 did the hospital have people working there from  
6 agencies?  
7 A. Yes, they did.  
8 Q. And were those RNs as well?  
9 A. Yes.  
10 Q. And what else besides RNs? CNAs?  
11 A. CNAs, yes. That's all I would know. I  
12 wouldn't know about kitchen staff or whatever. All I  
13 know is the nurses and the CNAs.  
14 Q. Do you know where the CNAs would park, the  
15 agency CNAs?  
16 A. They all parked where we parked, was my  
17 assumption. I don't know.  
18 Q. Okay. Did you have a special area where  
19 you would walk into the hospital, as an employee?  
20 A. Yes.  
21 Q. Where would you walk in?  
22 A. In the back. There was a specific door.  
23 Q. What did it say on it? Do you remember?  
24 A. It didn't say anything. It was just -- you  
25 were told in orientation that was where you came in.

Page 31

1 Q. Was there a time clock there?  
2 A. No.  
3 Q. Did you have to clock in?  
4 A. Yes.  
5 Q. Where was the time clock?  
6 A. Up by the elevators on each floor.  
7 Q. So in other words, when you first started  
8 working at the hospital, you would walk in, you'd  
9 park in the employee parking, you'd walk through the  
10 special door, and then you would go upstairs I guess  
11 to the 7th floor, and that's where you would check  
12 in. Is that right?  
13 A. Yes.  
14 Q. And how would you clock in?  
15 A. You would swipe your badge.  
16 Q. What I'm getting at is, it wasn't one of  
17 those old-fashioned time clock cards where you have  
18 to pull out your name and then clock in?  
19 A. No.  
20 Q. It was all done with this badge, right?  
21 A. Yes.  
22 Q. So you'd just slide it through, right?  
23 A. Yes.  
24 Q. How would you know if an employee -- or if  
25 a CNA or an RN was an agency RN, or not?

Page 32

1 A. By their badge.  
2 Q. What would the badge say?  
3 A. Well, their badge would be the one provided  
4 them by their agency, so it would have the agency's  
5 name on it.  
6 Q. Wouldn't it also have the name of the  
7 hospital on it?  
8 A. No.  
9 Q. How would you know that they actually  
10 belonged at the facility?  
11 A. Who would come in and work there if they  
12 weren't getting paid to work there?  
13 Q. Okay. Now, did you ever meet a CNA by the  
14 name of Steven Farmer?  
15 A. No.  
16 Q. You never met him?  
17 A. No, I did not.  
18 Q. Did you ever hear about a CNA by the name  
19 of Steven Farmer?  
20 A. The only time I heard was when the  
21 allegations came up.  
22 Q. Okay. What is a "sitter?"  
23 A. If a doctor writes an order that a person  
24 needs to have someone sitting there to watch them,  
25 due to altered mental status or for some other



Page 33

1 problem, then you have a CNA or a nurse sitting in  
2 the room right by the bed watching the patient.  
3 Q. Is it kind of like a private CNA or a  
4 private nurse?  
5 A. It can be a regular CNA or a regular nurse.  
6 Whoever is available.  
7 Q. Okay. And were there occasions while you  
8 were working at Centennial Hills that there were  
9 sitters with patients?  
10 A. Yes.  
11 Q. And as a matter of fact, Steven Farmer was  
12 a sitter with a patient, is that correct?  
13 A. Yes.  
14 MR. SILVESTRI: I move to strike.  
15 Lacks foundation.  
16 BY MR. MURDOCK:  
17 Q. Are you aware that Steven Farmer was  
18 assigned to be a sitter with a patient?  
19 MR. SILVESTRI: Objection. Lacks  
20 foundation.  
21 MR. BEMIS: You can go ahead and  
22 answer.  
23 THE WITNESS: After the fact.  
24 BY MR. MURDOCK:  
25 Q. After what fact?

Page 34

1 A. That he sat.  
2 Q. Was that on the 7th floor?  
3 A. Yes.  
4 Q. And my understanding is that Mr. Farmer was  
5 sitting with a patient sometime around February or  
6 early March at Centennial Hills when you were on  
7 duty, is that correct?  
8 A. Yes.  
9 Q. And at some point while Mr. Farmer was  
10 sitting with the patient, you heard some screams  
11 coming from that room. Is that correct?  
12 MR. SILVESTRI: I'm going to object.  
13 Lacks foundation.  
14 MS. HALL: Join.  
15 THE WITNESS: It wasn't screams like  
16 terrorized, or anything like that.  
17 It was somebody who was irritated.  
18 Like when you're screaming and somebody wakes you up  
19 and you're like, "Leave me alone. Get out of here."  
20 That kind of thing.  
21 BY MR. MURDOCK:  
22 Q. Where was this room, as opposed to where  
23 you were when you heard this activity?  
24 A. Okay. You have the nurses' station, which  
25 is a square. The room was here. I was standing over

Page 35

1 there.  
2 Q. Okay. Unfortunately that's not helpful, so  
3 let's see if we can't kind of figure this out here.  
4 A. Okay.  
5 Q. Let's do it this way first.  
6 I'm going to turn you into an  
7 artist right now, so if you could draw the nurses'  
8 station and the room where the screaming was, that  
9 would be great.  
10 A. This would be the nurses' station. This  
11 would be the room over here. I was standing over  
12 here.  
13 Q. Okay. So let's mark a few things on there.  
14 A. Okay.  
15 Q. First of all, where you put the circle  
16 where you said you were standing, could you write in  
17 "standing here?"  
18 A. Okay.  
19 Q. And where you marked the room, could you  
20 put the room? Just put the word "room."  
21 A. (Complying.)  
22 Q. I assume you don't know the room number?  
23 A. No.  
24 Q. So basically it was on the other side of  
25 the nurses' station, is that correct?

Page 36

1 A. Yes.  
2 Q. So you were on the other side of the  
3 nurses' station when you heard this -- let's say  
4 "commotion." Would you agree with that?  
5 A. Yes.  
6 MR. MURDOCK: We'll mark this as  
7 Plaintiff's Exhibit 1.  
8 (Plaintiff's Exhibit 1 marked.)  
9 MR. BEMIS: I'm just going to place an  
10 objection that it's not to scale, obviously.  
11 MR. MURDOCK: Of course not. If it  
12 was, I'd be amazed.  
13 BY MR. MURDOCK:  
14 Q. Nevertheless, so you hear the commotion,  
15 and at that point do you see Mr. Farmer come out of  
16 the room?  
17 A. No.  
18 Q. Okay. What did you do when you heard the  
19 commotion?  
20 A. I looked up. I looked over there. The  
21 nurse for that room was approaching the room, so I  
22 didn't do anything.  
23 Q. Do you recall who the nurse was?  
24 A. No, I do not.  
25 Q. And after the nurse approached the room and

Page 37

1 you looked up, what occurred then?  
2 A. I saw her go into the room. I didn't hear  
3 any more commotion. I went back to my job.  
4 Q. Was the door closed to the room?  
5 A. The door was not closed tight, no.  
6 Q. I didn't ask you that. Was the door  
7 closed?  
8 MR. SILVESTRI: Objection. Vague.  
9 THE WITNESS: It was halfway open. I  
10 mean you could see into the room. That's how I knew  
11 he was sitting there.  
12 BY MR. MURDOCK:  
13 Q. Was it dark?  
14 A. The light over the bed was on.  
15 Q. Okay. Do you remember speaking to the  
16 police?  
17 A. Yes.  
18 MR. MURDOCK: Let's mark this as  
19 Plaintiff's 2.  
20 (Plaintiff's Exhibit 2 marked.)  
21 BY MR. MURDOCK:  
22 Q. Ma'am, I'm showing you what's been marked  
23 as Plaintiff's Exhibit 2. Have you ever seen this  
24 document before?  
25 A. Yes.

Page 38

1 Q. When did you last see this document?  
2 A. Actually I saw it this afternoon.  
3 Q. How did you see it this afternoon?  
4 A. I was reviewing it before I came here.  
5 Q. How did you get it?  
6 MR. BEMIS: Objection. That's all  
7 privileged.  
8 MR. MURDOCK: Do you represent her?  
9 MR. BEMIS: Yes, I do. I sent you the  
10 correspondence.  
11 MR. MURDOCK: Well, I know you sent me  
12 correspondence, but have you been retained as her  
13 counsel, or are you just representing her as an  
14 employee of the hospital?  
15 MR. BEMIS: As an employee of the  
16 hospital.  
17 MR. MURDOCK: So I'll ask my question  
18 again.  
19 BY MR. MURDOCK:  
20 Q. Did you have a conversation with Mr. Bemis  
21 about this document?  
22 A. Yes.  
23 Q. When?  
24 A. Before I came here.  
25 Q. Did Mr. Bemis give you this document?

Page 39

1 A. Yes.  
2 Q. Had you ever seen this document before Mr.  
3 Bemis showed it to you?  
4 A. Yes, I did.  
5 Q. When did you see this document.  
6 A. I saw it before I went into court on the  
7 case in the beginning of this. Cagnina, or whatever  
8 her name is.  
9 MR. BEMIS: Let's not say any patient  
10 names.  
11 THE WITNESS: Okay. The former  
12 patient.  
13 BY MR. MURDOCK:  
14 Q. Did you meet with the District Attorney's  
15 office in this matter?  
16 A. In the former one?  
17 Q. In the criminal case.  
18 A. Yes.  
19 Q. Was Mr. Bemis there as well?  
20 A. No.  
21 Q. Outside of the District Attorney's office,  
22 was anybody else there?  
23 A. No.  
24 Q. Have you ever retained Mr. Bemis in this  
25 matter?

Page 40

1 A. No.  
2 Q. You spoke with the police about the other  
3 matter, is that correct?  
4 A. Yes.  
5 Q. And you gave a recorded statement, is that  
6 correct?  
7 A. Yes.  
8 Q. Prior to giving the recorded statement, did  
9 you have a conversation with the police?  
10 A. No.  
11 Q. Did you ever tell them about any incidents  
12 with Mr. Farmer, before you gave the recorded  
13 statement?  
14 A. No.  
15 Q. Now, did you tell the police that  
16 Mr. Farmer seemed more attentive to female patients  
17 than male patients?  
18 A. I said that was the way I observed some of  
19 his behavior.  
20 Q. I understand that. Okay.  
21 And could you explain that for us?  
22 A. Just that, as I said in here, that he  
23 offered to do things for a female patient -- offered  
24 to the nurse.  
25 Q. Like what?

Page 41

1 A. Putting the telemetry things on.  
2 Q. Now, putting telemetry leads on. How do  
3 you do that?  
4 MR. BEMIS: I object to form. Go ahead  
5 and answer.  
6 BY MR. MURDOCK:  
7 Q. You've done it before, right?  
8 A. Yeah.  
9 Q. How do you put on telemetry leads?  
10 A. You have little metal wires that are  
11 covered in plastic with snaps on the end. You snap  
12 on -- we call them dots, but they have a sticky back  
13 side. Then you place one here, one here, one here,  
14 one here, and one in the middle.  
15 Q. I'm sorry, you said "one here, one here,  
16 one here." Could you describe that for the record,  
17 where you put them?  
18 A. One to the right upper chest, one to the  
19 left upper chest, one to the right by the bottom of  
20 the ribcage, to the left bottom on the ribcage, and  
21 one to the sternum.  
22 Q. Are there times when you have to lift a  
23 woman's breast in order to place that lead?  
24 A. Yes.  
25 Q. And Mr. Farmer was willing to do that?

Page 42

1 MR. SILVESTRI: Objection. Lacks  
2 foundation.  
3 MR. BEMIS: Form.  
4 MS. HALL: Form.  
5 THE WITNESS: I saw him do that on one  
6 occasion, yes.  
7 BY MR. MURDOCK:  
8 Q. Tell me about that. You saw him do that.  
9 What did you see him do?  
10 A. I was walking by. The nurse had the  
11 telemetry unit in her hand. He said, "Oh, I can put  
12 that on for you." She handed it to him.  
13 Q. And he did that, right?  
14 A. I'm assuming he did. I didn't stand there  
15 and watch him, but --  
16 MR. SILVESTRI: Move to strike. Lacks  
17 foundation.  
18 BY MR. MURDOCK:  
19 Q. So you never saw him actually do it?  
20 A. No.  
21 Q. But you saw him offer to do it?  
22 A. Yes.  
23 Q. Is that right?  
24 A. Uh-huh.  
25 MR. SILVESTRI: It that a "yes?"

Page 43

1 THE WITNESS: Yes.  
2 MR. SILVESTRI: Thank you.  
3 BY MR. MURDOCK:  
4 Q. Am I correct that on women, usually you  
5 have to move the breast to place the lead?  
6 MS. HALL: I object to form.  
7 MR. BEMIS: I object to form.  
8 THE WITNESS: You do -- well, yeah, if  
9 they're large-breasted you have to, because you have  
10 to get under here, to the breast area.  
11 BY MR. MURDOCK:  
12 Q. And did you tell the police, "He would  
13 always say, 'I'll do that for you, you know, and you  
14 do what you have to do?'" Did you say that to the  
15 police?  
16 A. If it says it here, I guess I did.  
17 Q. Well, why don't you turn to LVMP 0178. At  
18 the bottom there's what's called a Bates stamp -- on  
19 the bottom of the pages. So if you could turn to  
20 page 178, in the middle of the paragraph.  
21 A. Okay. "He was always willing to do  
22 something extra."  
23 Q. Do you see where it says, "He would always  
24 say, 'Oh, I'll do that for you, you know, and you do  
25 what you have to do'"?

Page 44

1 A. Yes.  
2 Q. And you said that with regard to moving the  
3 breast for the telemetry, is that correct?  
4 MS. HALL: I object to form. Misstates  
5 testimony.  
6 THE WITNESS: I was just saying he  
7 would be willing to help with anything, not just  
8 that.  
9 BY MR. MURDOCK:  
10 Q. Oh, okay. Well, let's go before, and let's  
11 read this together. Okay?  
12 On page 178 you state -- do you  
13 see where there's an "A" in the middle of the page?  
14 A. Yes.  
15 Q. And do you see where your first word is  
16 "Well?"  
17 A. Yes.  
18 Q. Okay. It says -- well, we'll read the  
19 first part.  
20 It says, "Well, when he brought a  
21 patient up, if they had to have a (blank) on, he  
22 would offer to put the (blank) on."  
23 Do you see that?  
24 A. Uh-huh.  
25 Q. Is that a yes?

Page 45

1 A. Yes.  
2 Q. Do you know what those blanks were?  
3 A. I'm assuming it's telemetry. I don't know  
4 why it wasn't put in here.  
5 Q. Because that's what you were talking about,  
6 right?  
7 A. Yes.  
8 Q. Okay. So I read that sentence correctly?  
9 MR. SILVESTRI: Well, I'm going to  
10 object and move to strike, unless it says it all.  
11 BY MR. MURDOCK:  
12 Q. Well, let's read it again.  
13 "Well, when he brought a patient  
14 up, if they had to have a (blank) on, he would offer  
15 to put the (blank) on."  
16 A. Yes.  
17 Q. Did I read that correctly?  
18 A. Yes.  
19 Q. And you believe that the blank should have  
20 the word "telemetry" in it. Is that correct?  
21 A. I'm saying that my understanding would be  
22 that's what they're referring to, but it could be  
23 anything. It could be a gown on. It could be  
24 anything.  
25 Q. Well, this is your statement. Do you

Page 46

1 remember what you were talking about?  
2 A. About him being helpful.  
3 Q. Okay. Well, the next sentence states,  
4 "Which means of course, you know, behind the chest  
5 and they have to go on the ribcages."  
6 A. That's the telemetry dots.  
7 Q. Okay. So now we know what we're talking  
8 about. The telemetry, correct?  
9 A. Yes.  
10 Q. And I read that sentence correctly, is that  
11 right?  
12 A. Yes.  
13 Q. And the next sentence says, "So of course,  
14 on women it's usually you have to move the breast to  
15 put the, underneath the breast and stuff."  
16 Did I read that correctly?  
17 A. Yes.  
18 Q. The next sentence states, "He would always  
19 say, 'Oh, I'll do that for you, you know, and you do  
20 what you have to do.'" Did I read that correctly?  
21 A. Yes.  
22 Q. And this is your statement to the police,  
23 is that right?  
24 A. Yes.  
25 Q. Okay. And then it states -- as you go down

Page 47

1 there's a question, "Did it seem to be more for  
2 female patients, or any patient?" Your answer was,  
3 "Actually, I think it was more for female patients."  
4 Do you see that?  
5 A. Yes, I do.  
6 Q. Why is that? Why did you say that?  
7 MR. BEMIS: I object to form.  
8 THE WITNESS: Because that's what I  
9 thought. That doesn't mean that he didn't offer  
10 to --  
11 BY MR. MURDOCK:  
12 Q. I'm not asking you anything else except for  
13 what you saw.  
14 MS. HALL: Well, she's trying to answer  
15 the question.  
16 MR. MURDOCK: Thank you, Heather.  
17 BY MR. MURDOCK:  
18 Q. I'm asking you exactly what you saw.  
19 A. I saw female patients.  
20 Q. Okay. Now, as you go on -- and you're  
21 welcome to read this, I'm not trying to stop you.  
22 You can certainly read it.  
23 You state actually that the CNAs  
24 do put on the telemetry leads at Centennial Hills.  
25 If you skip to the next page is where you say it, on

Page 48

1 179. Why don't you take a look at that.  
2 A. Yeah.  
3 Q. Why don't you read that for a second.  
4 A. Okay. My understanding is that it has to  
5 do with the nurse. If the nurse allows the CNA, then  
6 fine. If not, then the nurse does it.  
7 Q. Do you recall anything -- any documents,  
8 any rules, any regulations, any policies or  
9 procedures -- instructing nurses to allow CNAs to do  
10 that, to place the telemetry leads?  
11 A. No. Neither one way or the other.  
12 Q. But in your personal background, you just  
13 wouldn't do it, right?  
14 A. No, I wouldn't.  
15 Q. But some nurses did?  
16 A. Yes.  
17 Q. Okay. Now, let's go to page 180, and the  
18 detective -- as you go down the page there's a line  
19 that starts with, "Oh, okay."  
20 A. Yes.  
21 Q. The detective states, "Um, can you think of  
22 anything else I didn't ask you or I might not be  
23 aware of that you feel is important, that might  
24 assist me in my investigation, or something I need to  
25 be made aware of?"

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 49</p> <p>1 Your answer is, "The only thing I<br/>2 can think of, like I said, is the older lady that he<br/>3 did the one-to-one sittings with." Do you see that?<br/>4 A. Yes, I do.<br/>5 Q. Now, what did you mean when you said, "like<br/>6 I said?" Had you told him about this before?<br/>7 A. No.<br/>8 Q. So why did you say "like I said?"<br/>9 A. I have no idea.<br/>10 Q. Did you tell somebody else about that?<br/>11 A. We had talked about it between ourselves<br/>12 the night it happened, yes.<br/>13 Q. Who did you talk about it with?<br/>14 A. The other nurses.<br/>15 Q. Do you recall any names?<br/>16 A. No.<br/>17 Q. And you were talking about this incident<br/>18 with the sitting?<br/>19 A. Yes.<br/>20 Q. And your next answer states, "Which means<br/>21 that the doctor ordered for somebody to be in the<br/>22 room with her at all times." Do you see that?<br/>23 A. Yes, I do.<br/>24 Q. Then you state, "He was in there on the<br/>25 evening shift. It was dark, because he had the</p> | <p style="text-align: right;">Page 51</p> <p>1 A. Yes.<br/>2 Q. Did you state that?<br/>3 A. Yes.<br/>4 Q. You used the word "yelling," is that<br/>5 correct?<br/>6 A. Yes.<br/>7 Q. The policeman didn't use the word<br/>8 "yelling." You used the word "yelling," is that<br/>9 correct?<br/>10 A. Yes.<br/>11 Q. Okay. So you heard the patient yelling, is<br/>12 that correct?<br/>13 A. Yes.<br/>14 Q. Okay. And in fact you told the police,<br/>15 "The yelling consisted of, 'I don't want you by me.<br/>16 Get out of here.'" Is that correct?<br/>17 A. Yes.<br/>18 Q. When you were speaking with the police you<br/>19 were being honest and truthful, right?<br/>20 MR. BEMIS: I object to form.<br/>21 THE WITNESS: Yes.<br/>22 BY MR. MURDOCK:<br/>23 Q. You wouldn't want to mislead the police,<br/>24 right?<br/>25 A. No.</p>                                                                                                                                                                                |
| <p style="text-align: right;">Page 50</p> <p>1 lights out." Did I read that correctly?<br/>2 A. Yes.<br/>3 Q. "The door was closed." Did I read that<br/>4 correctly?<br/>5 A. Yes.<br/>6 Q. So did you tell the police he was in there<br/>7 on the evening shift, and it was dark because he had<br/>8 the lights out?<br/>9 A. Yes.<br/>10 Q. Did you tell the police the door was<br/>11 closed?<br/>12 A. Well, obviously I did.<br/>13 Q. Okay. Then you state, "Which usually for a<br/>14 one-to-one, if I had been the nurse, which I wasn't,<br/>15 I would want the door open. I want to see what's<br/>16 going on." Did I read that correctly?<br/>17 A. Yes.<br/>18 Q. Did you tell the police that?<br/>19 A. Yes.<br/>20 Q. Then you stated, "But we did hear her<br/>21 yelling."<br/>22 A. Yes.<br/>23 Q. Do you see that?<br/>24 A. Uh-huh.<br/>25 Q. Is that a yes?</p>                                                                                                                                                                                    | <p style="text-align: right;">Page 52</p> <p>1 MR. BEMIS: Same objection.<br/>2 BY MR. MURDOCK:<br/>3 Q. You wouldn't want to tell lies to the<br/>4 police, right?<br/>5 MR. BEMIS: Same objection.<br/>6 THE WITNESS: No.<br/>7 BY MR. MURDOCK:<br/>8 Q. So you were being honest, truthful, and<br/>9 everything I've read so far from your statement is<br/>10 exactly what you told the police, is that right?<br/>11 MR. BEMIS: I object to form.<br/>12 THE WITNESS: Yes.<br/>13 BY MR. MURDOCK:<br/>14 Q. Okay. So let's see.<br/>15 You heard the patient yelling,<br/>16 correct?<br/>17 A. Yes.<br/>18 Q. And according to Plaintiff's Exhibit 1 the<br/>19 patient was yelling -- you heard the patient yelling,<br/>20 you were on one side of the nurses' station, and the<br/>21 room was on the other side. Is that correct?<br/>22 A. Yes.<br/>23 Q. And when you heard the patient yelling, you<br/>24 actually heard the patient yelling, "I don't want you<br/>25 by me. Get out of here." Is that correct?</p> |

Page 53

1 A. Yes.  
2 Q. After you heard the patient yelling, did  
3 you go investigate what she was yelling about?  
4 MR. SILVESTRI: Objection. Asked and  
5 answered.  
6 THE WITNESS: No, I did not.  
7 BY MR. MURDOCK:  
8 Q. Did you ever ask her nurse what the patient  
9 was yelling about?  
10 A. No.  
11 Q. And then you said to the police, "And we  
12 thought she's a little crazy." Is that correct?  
13 A. Yes.  
14 Q. You're talking about the patient?  
15 A. Yes.  
16 Q. And then you told the police, "She's a  
17 little crazy old lady. That's why she has the  
18 sitter." Is that right?  
19 A. Yes.  
20 Q. And then you stated as you go down, "So we  
21 didn't put any credence into what she was saying."  
22 Is that right?  
23 A. Right.  
24 Q. That's what you told the police, right?  
25 A. Yes.

Page 54

1 Q. Okay. So what was she saying that you  
2 didn't put any credence into?  
3 A. The fact that she was yelling any of this.  
4 She could have been in an altered mental state. She  
5 could have been coming out of a post surgical  
6 amnesia.  
7 Q. She could have been raped, right?  
8 MS. HALL: I object to form.  
9 MR. BEMIS: I object to form.  
10 MR. SILVESTRI: Objection. It's  
11 argumentative.  
12 BY MR. MURDOCK:  
13 Q. She could have, right?  
14 MS. HALL: I object to form. Calls for  
15 speculation.  
16 MR. BEMIS: Same objection. Calls for  
17 speculation.  
18 BY MR. MURDOCK:  
19 Q. You can answer the question.  
20 A. That would be speculation. I don't know.  
21 Q. Oh, okay. So yours wasn't speculation.  
22 Was she coming out of an alcoholic  
23 thing?  
24 A. I don't know.  
25 Q. Was she insane?

Page 55

1 MR. BEMIS: I object to form.  
2 THE WITNESS: I don't know.  
3 BY MR. MURDOCK:  
4 Q. Do you know anything about this patient?  
5 A. No.  
6 Q. Do you know what her diagnosis is?  
7 A. No.  
8 Q. Okay. But nevertheless, you told the  
9 policeman, "She's a little crazy old lady and that's  
10 why she has the sitter, so we didn't put any credence  
11 into what she was saying." Right?  
12 A. Yes.  
13 Q. What was she saying exactly that you didn't  
14 put any credence into?  
15 MR. BEMIS: Asked and answered.  
16 MS. HALL: Join.  
17 THE WITNESS: That she was yelling for  
18 a person to get away from her.  
19 BY MR. MURDOCK:  
20 Q. Okay. And when you stated, "So we didn't  
21 put any credence into what she was saying," what did  
22 you mean by that?  
23 MS. HALL: Objection. Asked and  
24 answered.  
25 MR. BEMIS: Join.

Page 56

1 THE WITNESS: Do I have to answer that?  
2 MR. BEMIS: Go ahead answer it.  
3 THE WITNESS: All right. We have  
4 oftentimes patients who wake up and are unfamiliar  
5 with where they are and what's going on, and they  
6 start yelling if a CNA is there trying to clean them  
7 up, or a nurse is trying to give them a shot, or  
8 whatever is going on.  
9 And it's not that they're being  
10 hurt or being taken advantage of; it's just that  
11 they're not aware of where they are or what is going  
12 on.  
13 BY MR. MURDOCK:  
14 Q. Sure. But did you know whether this  
15 patient had that issue?  
16 A. No, I didn't.  
17 Q. So you assumed she was a little crazy old  
18 lady, right?  
19 A. Yes, I did.  
20 Q. Okay.  
21 A. Or that she was in an altered mental  
22 status.  
23 Q. That was your assumption?  
24 A. Yes.  
25 Q. But you took no steps to find out whether

Page 57

1 or not she actually was being assaulted?  
2 A. I didn't have to. Her nurse went in there  
3 to see what was going on.  
4 Q. And you never asked the nurse what  
5 happened, right?  
6 A. That's not my business.  
7 Q. Okay. Now, did the nurse go into the room?  
8 A. Yes, she did.  
9 Q. If you can, could you describe the nurse  
10 for us?  
11 A. No. I don't remember who the nurse was.  
12 Q. So you can't tell me what she looked like,  
13 or he looked like in any way?  
14 A. No.  
15 Q. Was it a "he" or a "she?"  
16 A. I believe it was a woman, but I'm not  
17 positive.  
18 Q. And when you got together, as you said  
19 before, all the nurses, when this all came up, when  
20 the criminal case came up and you had this  
21 discussion -- you said you talked about this issue  
22 with the sitter. Do you remember that?  
23 A. No.  
24 Q. Well, you said before, when we talked about  
25 the sentence here where it says, "The only thing I

Page 58

1 can think of, like I said, is the older lady that he  
2 did the one-to-one sittings with" --  
3 A. Oh, okay.  
4 Q. You said there was a conversation between  
5 you and the rest of the nurses about this incident.  
6 A. That would have been as we were standing at  
7 the nurses' desk when the yelling was going on, after  
8 the nurse walked into the room.  
9 Q. Do you recall how many nurses --  
10 A. Well, there wouldn't have been more than  
11 three, because there was never more than four of us.  
12 And if she went in the room, that left three.  
13 Q. And did any of you have a conversation with  
14 that nurse after the fact?  
15 MR. BEMIS: Calls for speculation.  
16 BY MR. MURDOCK:  
17 Q. As far as you know?  
18 A. I have no idea.  
19 Q. You certainly didn't, is that right?  
20 A. I did not, no.  
21 Q. Okay. Outside of hearing the patient yell,  
22 "I don't want you by me, get out of here," did you  
23 hear her yell anything else?  
24 A. No, I did not.  
25 Q. Do you recall her yelling anything else?

Page 59

1 A. No.  
2 Q. So just so I'm clear, when you stated, "So  
3 we didn't put any credence into what she was saying,"  
4 you were talking about when she was yelling, "I don't  
5 want you by me, get out of here." Is that right?  
6 A. Yes.  
7 Q. Okay. Now, this occurred on the 6th floor,  
8 didn't it?  
9 A. On the 6th floor?  
10 Q. Yeah.  
11 A. I thought it was on the 7th floor.  
12 Q. Well, why don't you keep reading down on  
13 181. Maybe that will refresh your recollection.  
14 A. Okay. Then yes, it was. We got pulled  
15 back and forth, so it's easy to not remember exactly  
16 what floor you were on every night.  
17 Q. Now, would the drawing that you made as  
18 Plaintiff's Exhibit 1 -- would that be different  
19 because it was on the 6th floor, as opposed to the  
20 7th?  
21 A. No. They're all exactly the same.  
22 Q. Okay. Now, then the policeman says to you,  
23 "Okay. Do you remember what she was in for? What  
24 that victim?" Then you state, "I don't know."  
25 A. Right.

Page 60

1 Q. You're talking about the --  
2 A. Patient.  
3 Q. -- what you termed the little crazy old  
4 lady patient, is that correct?  
5 A. The patient, yes.  
6 Q. But that's the patient we're talking about  
7 here, right?  
8 A. Yes.  
9 Q. Now, outside of telling the police about  
10 this -- what you termed "the little crazy old lady,"  
11 and the incident with Mr. Farmer -- did you ever tell  
12 anybody else about that?  
13 A. No.  
14 Q. After the incident took place, after the  
15 arrest, and Ms. Cagnina, things like that, did you  
16 ever tell anybody at the hospital about this  
17 incident?  
18 A. No.  
19 Q. So the first and only time you ever  
20 discussed this patient, the little crazy old lady  
21 patient with anyone, would have been with this  
22 detective. Is that correct?  
23 A. No. Wait a minute. The director of  
24 nursing called me down and we talked about this, too,  
25 after I talked to the police. When she got a copy of

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 61</p> <p>1 this, I talked to her. And that was it.</p> <p>2 Q. Who was the director of nursing at the</p> <p>3 time?</p> <p>4 A. I really don't know.</p> <p>5 Q. But the director of nursing called you down</p> <p>6 after she read the statement, is that correct?</p> <p>7 A. Yes. She talked to all of us.</p> <p>8 Q. What do you mean, she talked to all of you?</p> <p>9 A. She talked to all the nurses that were</p> <p>10 involved in this.</p> <p>11 Q. Did you go through the statement with her?</p> <p>12 A. She asked me what happened. I told her</p> <p>13 what I knew. We didn't pick this up and go through</p> <p>14 it line by line like we are now, but she knew what</p> <p>15 was -- I mean she had read it.</p> <p>16 Q. Did she ask you about the little crazy old</p> <p>17 lady patient? Was that something you discussed?</p> <p>18 A. You know, I'm not sure. She just asked</p> <p>19 about what I knew. No, I don't believe we did go</p> <p>20 through that. We went through the other part,</p> <p>21 because that was what was coming up.</p> <p>22 Q. And outside of me asking you about this</p> <p>23 little crazy old lady patient, and the detective, has</p> <p>24 anybody else ever asked you about it?</p> <p>25 A. No.</p> | <p style="text-align: right;">Page 63</p> <p>1 needed.</p> <p>2 Q. So if they went into a room to help</p> <p>3 somebody clean up who had thrown up, or maybe went to</p> <p>4 the bathroom, typically the light would come on and a</p> <p>5 CNA would know to go in there?</p> <p>6 MR. MURDOCK: Objection. Speculation.</p> <p>7 Go ahead.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. SILVESTRI:</p> <p>10 Q. Did the CNAs typically just go on random</p> <p>11 checks and see that people had thrown up or soiled</p> <p>12 themselves?</p> <p>13 A. Not really. Usually you're so busy with</p> <p>14 the lights you don't have a chance to.</p> <p>15 Q. Let me ask you, when you were asked about a</p> <p>16 sitter, you used the term -- and I don't know if it</p> <p>17 was a term of art -- altered mental state or mental</p> <p>18 status.</p> <p>19 A. Yes.</p> <p>20 Q. Can you just tell me generally what you</p> <p>21 mean by "altered mental status?"</p> <p>22 A. That means a patient who is not thinking</p> <p>23 clearly enough, to where they can harm themselves,</p> <p>24 pull tubes out, pull IVs out, pull blood out,</p> <p>25 whatever. And they can only have a one-on-one with a</p> |
| <p style="text-align: right;">Page 62</p> <p>1 MR. MURDOCK: I don't think I have any</p> <p>2 further questions at this time.</p> <p>3</p> <p>4 EXAMINATION</p> <p>5 BY MR. SILVESTRI:</p> <p>6 Q. Ms. Murray, name is Jim Silvestri. I</p> <p>7 represent American Nursing Services. I have just a</p> <p>8 couple of follow-up questions for you, if you don't</p> <p>9 mind.</p> <p>10 A. Sure.</p> <p>11 Q. When you worked at Centennial Hills</p> <p>12 Hospital, did CNAs, certified nursing assistants --</p> <p>13 did they operate independently of the registered</p> <p>14 nurses?</p> <p>15 A. You mean have their own duties that they</p> <p>16 did?</p> <p>17 Q. Without being told.</p> <p>18 A. Yes.</p> <p>19 Q. What kind of duties did they have that they</p> <p>20 would not need instruction from an RN on, or a doctor</p> <p>21 on, to perform?</p> <p>22 A. Answering lights, walking patients to the</p> <p>23 bathroom, helping patients clean up if they had</p> <p>24 become nauseous or if they had an accident. Helping</p> <p>25 them change their clothes, bringing them stuff they</p>                                                                                                                                                                                  | <p style="text-align: right;">Page 64</p> <p>1 doctor's order saying they are not thinking clearly</p> <p>2 enough, so that they need to have somebody sitting</p> <p>3 there with them.</p> <p>4 Q. Did you work with Steven Farmer personally?</p> <p>5 A. No.</p> <p>6 Q. You were asked about application of</p> <p>7 telemetry leads.</p> <p>8 A. Yes.</p> <p>9 Q. And correct me if I'm wrong -- and I don't</p> <p>10 mean to be insensitive about this, or overly</p> <p>11 invasive -- but a woman that is more endowed is more</p> <p>12 likely to have her breast arranged such that the</p> <p>13 telemetry lead can be placed under near the ribcage?</p> <p>14 A. Yes.</p> <p>15 Q. Do you place telemetry leads on the nipple</p> <p>16 of the breast?</p> <p>17 A. No.</p> <p>18 Q. Have you ever done that?</p> <p>19 A. No.</p> <p>20 Q. Is there any reason to do that, that you're</p> <p>21 aware of?</p> <p>22 A. No.</p> <p>23 Q. Are you aware of any nurses at Centennial</p> <p>24 Hills Hospital ever being instructed to digitally</p> <p>25 penetrate a female patient?</p>                                                                                                                  |



Page 65

1 MR. MURDOCK: Objection. Go ahead.  
2 THE WITNESS: The only time you would  
3 have to -- that would be rectally, and that's only if  
4 they're impacted.  
5 BY MR. SILVESTRI:  
6 Q. "Impacted" meaning they're not having a  
7 bowel movement?  
8 A. Right.  
9 Q. Have you ever instructed a CNA to digitally  
10 penetrate a female patient?  
11 A. No. They're not allowed to do that --  
12 CNAs.  
13 Q. Are they allowed to digitally penetrate the  
14 vagina?  
15 A. No.  
16 Q. You were being asked questions about this  
17 statement that you gave to the police that's in front  
18 of you, Exhibit 2.  
19 A. Yes.  
20 Q. Do you recall whether you had an informal  
21 interview with that police officer, before you were  
22 asked to give a recorded statement? Like, "Can we  
23 put this now on tape?"  
24 A. He came in and introduced himself, and then  
25 he said, "We're going to put this on tape."

Page 66

1 Q. So no informal discussion before?  
2 A. No.  
3 Q. And then you were being asked some  
4 questions on page 178, and that's the Bates stamp at  
5 the bottom, and you were being asked questions about  
6 whether Mr. Farmer was helpful or not, offering to  
7 help the nurses with whom he worked.  
8 A. Uh-huh.  
9 Q. And I believe your testimony in questioning  
10 from Mr. Murdock was that you overheard him offer to  
11 another nurse to apply the telemetry leads to a  
12 female patient.  
13 A. Yes.  
14 Q. And I have that you heard that one time?  
15 A. Yes.  
16 Q. But you didn't see it happen?  
17 A. No, I did not.  
18 Q. Is that the only time you heard Mr. Farmer  
19 make such an offer to another nurse?  
20 A. Yes.  
21 Q. And then this statement that you made where  
22 it said, "He would always say, 'Oh, I'll' -- and  
23 they've got a little equal sign where there should be  
24 an apostrophe, right? "I'll do that for you, you  
25 know, and you do what you have to do."

Page 67

1 A. Yes.  
2 Q. Was that comment made by you with respect  
3 to him just being helpful in a general way?  
4 A. Yes.  
5 Q. Do you recall specifically other occasions  
6 where Mr. Farmer told another nurse that he would be  
7 helpful to a female patient?  
8 A. I know that he had offered to walk somebody  
9 into the bathroom, instead of waiting for the nurse  
10 to do it.  
11 Q. Okay.  
12 A. The thing is that running around, you just  
13 would hear different things. Like you would hear --  
14 not just him, but other CNAs, "I can do that for  
15 you," and they do it. What exactly they were, I  
16 don't know. It wasn't to me. It was to somebody  
17 else.  
18 Q. You don't recall the names of some of these  
19 people to whom other CNAs were talking or anything?  
20 A. No.  
21 Q. Was there ever a situation where -- or was  
22 it the situation that you felt Mr. Farmer was  
23 suspicious?  
24 A. No.  
25 Q. You didn't report him to anybody, did you?

Page 68

1 A. No, I did not.  
2 Q. If I understand you correctly, you say that  
3 you witnessed one time where he offered to place  
4 telemetry leads on a female patient, and you  
5 witnessed one time where he offered to take somebody  
6 to the bathroom?  
7 A. Yes.  
8 Q. Was that a female?  
9 A. Yes.  
10 Q. Do you recall any other specific instances  
11 where he made such an offer to help a female patient?  
12 A. No.  
13 Q. Does a CNA typically apply telemetry leads  
14 without being instructed to do so by a nurse?  
15 MR. MURDOCK: Objection. Speculation.  
16 THE WITNESS: Most of the nurses do  
17 that.  
18 BY MR. SILVESTRI:  
19 Q. Okay. In the situations though that you  
20 witnessed, where a nurse would allow a CNA to perform  
21 that function, has that nurse instructed the CNA to  
22 do that?  
23 A. Well, I don't really know, but I would  
24 assume -- just an assumption -- that she would ask  
25 him if they knew what they were doing, first of all.

Page 69

1 And if not, then she could show him, if she wanted  
2 to. If not, she could just put it on herself. It's  
3 much easier.  
4 Q. Are telemetry leads applied only under  
5 doctors' orders?  
6 A. Yes.  
7 Q. So you, as a nurse -- can you order that?  
8 A. No.  
9 Q. Can a CNA order that?  
10 A. No.  
11 Q. At a minimum there would have to be a  
12 doctor's order?  
13 A. Yes.  
14 Q. You were also then asked questions about  
15 this incident on the 6th floor, the woman for whom  
16 Mr. Farmer was sitting.  
17 A. Yes.  
18 Q. I didn't quite understand. I think you  
19 said -- I wrote this down, that you said you found  
20 out after the fact that Farmer was a sitter.  
21 A. Yes.  
22 Q. So when did you find out that Mr. Farmer  
23 was a sitter in this room for this elderly woman?  
24 A. After she was yelling, and then you could  
25 see in the door that he stood up and walked over --

Page 70

1 kind of like walked over, like I'm assuming he was  
2 trying to find out what she was yelling about.  
3 Q. So when you say found out after the fact,  
4 it was after this yelling that you heard?  
5 A. Yes.  
6 Q. And as I understand it, the yelling was  
7 related to her saying, "I don't want you by me, get  
8 out of here?"  
9 A. Yes.  
10 Q. You mention in your statement that the door  
11 was closed. Did it appear to be completely closed?  
12 A. No.  
13 Q. It was not completely open?  
14 A. No.  
15 Q. Is that a fair statement?  
16 A. Yes.  
17 Q. Because otherwise it probably would have  
18 been difficult to hear what she was saying?  
19 A. Yes.  
20 Q. Especially given the fact that you were on  
21 the other side of the hallway?  
22 A. Yes.  
23 Q. You also indicated in the statement that it  
24 was dark, but you told us today that you recall a  
25 light being on over the bed?

Page 71

1 A. I can remember seeing light. Now, whether  
2 it was the hall light, or whether it was the light  
3 over the bed, I'm not sure.  
4 Q. Okay.  
5 A. Because like I said, I'm on the other side  
6 over here. It's way over there.  
7 Q. Well, my recollection of hospital rooms is  
8 that there are several lights in the room.  
9 Is that the same way on the 6th  
10 floor at Centennial Hills?  
11 A. Yes. They have some small ones that are  
12 automatically always on by the floor.  
13 Q. And there are some lights that can go on  
14 over the bed?  
15 A. Yes.  
16 Q. And there might even be some lights that  
17 can go on for visitors that come to the room?  
18 A. Yes.  
19 MR. SILVESTRI: I'll pass the witness.  
20  
21 EXAMINATION  
22 BY MS. HALL:  
23 Q. Hi, Nurse Murray. I know you and I met a  
24 moment ago, but just for the record my name is  
25 Heather Hall and I represent Steven Farmer in this

Page 72

1 case.  
2 A. Okay.  
3 Q. Hopefully I won't go over anything you've  
4 already been asked, and I think I just have a few  
5 questions for you.  
6 MR. MURDOCK: And just for the record,  
7 I'm going to object to any questions you're asking,  
8 unless they have something to do with damages or  
9 comparative fault.  
10 MS. HALL: You can object to whatever  
11 you like. I'm still going to ask the questions, but  
12 you're welcome to object to whatever you'd like to  
13 object to.  
14 MR. MURDOCK: I'm not so sure about  
15 that, okay?  
16 MS. HALL: Well, we're here for Jane  
17 Doe. We're not here for this little lady on the 6th  
18 floor, so I'm entitled to ask the questions that I  
19 have. If you find something objectionable, feel free  
20 to object.  
21 MR. MURDOCK: Okay. You've lost  
22 liability, so the only question you're here for is  
23 damages, okay?  
24 So unless you can tell me your  
25 questions relate somehow to damages, I don't know why

Page 73

1 you should be allowed to ask any questions.  
2 MS. HALL: Okay. Well, I'm going to  
3 ask my questions, and you can object to what you'd  
4 like to object to.  
5 MR. SILVESTRI: It's discovery.  
6 MR. MURDOCK: I'm sorry?  
7 MR. SILVESTRI: It's discovery.  
8 MR. MURDOCK: Yeah, I know it's  
9 discovery, and I appreciate that.  
10 MR. SILVESTRI: All right.  
11 MR. MURDOCK: But I don't think that --  
12 MR. SILVESTRI: I mean there might be  
13 appellate rights and all that, but --  
14 MR. MURDOCK: Well, because I think she  
15 represents him criminally, too, so I think it's  
16 inappropriate, just for the record.  
17 I'm going to let you ask the  
18 questions, but for the record, I think it's  
19 absolutely inappropriate for you to ask any questions  
20 in this matter.  
21 I'm going to give you a little  
22 leeway, as you gave me the other day. I'm going to  
23 give you a little leeway --  
24 MS. HALL: Oh, yeah?  
25 MR. MURDOCK: But if I think it impedes

Page 74

1 a little too much, I will stop the deposition. we'll  
2 go over to Bonny, I'll file a motion and we'll go  
3 from there.  
4 I think it's inappropriate once  
5 you've lost. A few weeks ago, no issue. But once  
6 you've lost, it's a different story.  
7 So with that said, go ahead.  
8 MS. HALL: And just for the record,  
9 Mr. Murdock, I have questions related to the lady  
10 that we've discussed at length. This isn't related  
11 to Jane Doe, so I'm entitled to ask these questions.  
12 MR. MURDOCK: No, you're not.  
13 MS. HALL: Yes, I am.  
14 MR. MURDOCK: Why would you be able to  
15 ask questions about the lady if they didn't have  
16 anything to do with damages? If they have something  
17 to do with damages --  
18 MS. HALL: They have something to do  
19 with damages.  
20 MR. MURDOCK: What?  
21 MS. HALL: Well, let me ask my  
22 questions, and then you can make your objections.  
23 MR. MURDOCK: Okay. Go ahead.  
24 MS. HALL: Thank you.  
25

Page 75

1 BY MS. HALL:  
2 Q. Nurse Murray, in your mind is there a  
3 difference between a yell and a scream?  
4 A. Yes.  
5 MR. MURDOCK: Objection.  
6 BY MS. HALL:  
7 Q. Earlier you described what you heard coming  
8 from the lady's room on the 6th floor as a "yell,"  
9 correct?  
10 A. Yes.  
11 Q. I think earlier you also described it as  
12 you said she sounded irritated?  
13 A. Yes.  
14 Q. Did you believe she sounded frightened or  
15 scared in any way?  
16 MR. MURDOCK: Objection. Speculation.  
17 Go ahead.  
18 THE WITNESS: No. Just like she was  
19 irritated that she's being woke up or -- you know,  
20 when you're sleeping and you're being told to wake  
21 up. Like, "Leave me alone." That type of yelling.  
22 BY MS. HALL:  
23 Q. And I think a moment ago when Mr. Silvestri  
24 was questioning you, you answered that you saw  
25 Mr. Farmer stand up and go over to the bed after the

Page 76

1 yelling started.  
2 A. Yeah. That's when I saw him. That's how I  
3 knew he was the sitter.  
4 Q. So the yelling started first, and then you  
5 saw him walk to the bed?  
6 A. Yes.  
7 MS. HALL: Thank you. I have no  
8 further questions.  
9 MR. MURDOCK: I move to strike all  
10 that. Go ahead.  
11 MR. BEMIS: I don't have any questions.  
12  
13 FURTHER EXAMINATION  
14 BY MR. MURDOCK:  
15 Q. Let me just go through some of this.  
16 Now, you didn't see what  
17 Mr. Farmer did before the yelling came from the  
18 patient, is that correct?  
19 A. That's correct.  
20 Q. So you have no idea what Mr. Farmer was  
21 doing before the yelling began, is that correct?  
22 A. That's correct.  
23 Q. Now, apparently you think there's a  
24 difference between "yelling" and "screaming." Is  
25 that correct?

Page 77

1 A. Yes, I do.  
2 Q. Now, in terms of "yelling," you overheard  
3 this "yelling" from -- how many feet away is that,  
4 approximately? As we talked about it on Plaintiff's  
5 Exhibit 1, how far away were you? 10 feet? The  
6 length of this table here? What are we talking  
7 about? The length of this table is about 20 feet.  
8 A. Okay. The length of the table.  
9 Q. So about 20 feet away?  
10 A. Uh-huh.  
11 Q. So you were able to hear with the door at  
12 least partially closed, you admitted today --  
13 A. Yes.  
14 Q. -- you were able to hear somebody yelling,  
15 "I don't want you by me. Get out of here." Right?  
16 A. Yes.  
17 Q. And again, you had no idea what Farmer was  
18 doing before the yelling started, right?  
19 MS. HALL: Objection. Form.  
20 MR. BEMIS: Form.  
21 THE WITNESS: That's right.  
22 BY MR. MURDOCK:  
23 Q. You have no idea whether he was waking her  
24 up, not waking her up, whether she was waking up,  
25 whether she had been up, or anything like that,

Page 78

1 right?  
2 MS. HALL: Objection. Form.  
3 Foundation.  
4 MR. BEMIS: Join.  
5 THE WITNESS: Right.  
6 BY MR. MURDOCK:  
7 Q. When you stated that you thought the crazy  
8 old lady, as you phrased it, might have an altered  
9 mental state -- you don't have any idea about that.  
10 You don't have any personal knowledge as to whether  
11 or not she was in an altered mental state, do you?  
12 A. She would not have had a one-to-one sitter  
13 by order of a doctor if she was in a clear mind, so  
14 obviously she was in an altered mental status.  
15 Q. So in other words, every person who has a  
16 one-to-one is in an altered mental state, is that  
17 correct?  
18 A. Yes.  
19 Q. Oh, okay. They don't have one-to-ones for  
20 any other reasons?  
21 A. If they're clear-minded they're not going  
22 to pull things out, so no.  
23 Q. Okay. So just so I'm clear, the only  
24 reason -- the only reason -- a patient would have a  
25 one-to-one would be because that patient has an

Page 79

1 altered mental state. Is that correct?  
2 A. Yes.  
3 Q. Okay. Now, you testified when  
4 Mr. Silvestri was asking you questions, that you saw  
5 Mr. Farmer on one occasion offer to move the breast  
6 out of the way and attach the telemetry leads, right?  
7 MR. SILVESTRI: Objection.  
8 Mischaracterizes the testimony.  
9 THE WITNESS: I didn't say that.  
10 BY MR. MURDOCK:  
11 Q. Okay. You know what? I made a mistake.  
12 I'm wrong about that.  
13 You told Mr. Silvestri that on two  
14 occasions you overheard Mr. Farmer offer to help.  
15 A. Yes.  
16 Q. One of those was putting on telemetry  
17 leads, correct?  
18 A. Yes.  
19 Q. And the other one was offering to help  
20 another female go to the bathroom, right?  
21 A. Yes.  
22 Q. Now, that conversation came about as a  
23 result of page 178, your statement to Metro. Okay?  
24 A. Uh-huh.  
25 Q. Now, your statement to Metro -- and again,

Page 80

1 you told me before you wanted to be truthful and  
2 honest and not misleading, right?  
3 A. Yes.  
4 Q. So when you told the detective, "Well, when  
5 he brought a patient up, if they have to have a  
6 (blank) on, he would offer to put the (blank) on.  
7 Which means of course, you know, behind the chest and  
8 they have to go on the ribcages. So of course on  
9 women it's usually, you have to move the breast to  
10 put the, underneath the breast and stuff. He would  
11 always say, 'Oh, I'll do that for you, you know, and  
12 you do what you have to do.'"  
13 That's what you told the police,  
14 right?  
15 A. Uh-huh.  
16 Q. Is that a yes?  
17 A. Yes.  
18 Q. So you used the word "always," is that  
19 correct?  
20 A. Yes, I did.  
21 Q. So when you were using the word "always,"  
22 you were actually just saying "twice." Is that  
23 correct?  
24 A. Yes.  
25 Q. Okay. So today it's twice. When you spoke

Page 81

1 to Metro back in 2008, you told the detective he  
2 would always do this. Is that right?  
3 A. Yes.  
4 Q. Do you think your memory was better about  
5 this incident back in 2008 than it is today in 2015?  
6 MR. BEMIS: Objection. Form.  
7 Speculation.  
8 THE WITNESS: No. I hardly ever worked  
9 with this man, and the "always" is the two times that  
10 I worked with him that I knew that he did this.  
11 BY MR. MURDOCK:  
12 Q. But you didn't tell the policeman "two  
13 times." You told him "always," right?  
14 A. Well, that was always to me.  
15 Q. Okay. And of course then you told the  
16 policeman that he was more helpful to female patients  
17 than to male patients, right?  
18 A. In my experience.  
19 Q. Is that just the two patients we're talking  
20 about, or were there more?  
21 A. That's the two patients I know of.  
22 Q. So out of all the patients you saw at  
23 Centennial Hills Hospital, first you used the word  
24 "always," second you tell the policeman, well, you  
25 think he was more helpful to female patients, because

Page 82

1 you saw him twice. Is that correct?  
2 MS. HALL: Form.  
3 THE WITNESS: That was the patients  
4 that I saw him be helpful with.  
5 BY MR. MURDOCK:  
6 Q. Two female patients.  
7 A. Because we very rarely worked together,  
8 yes.  
9 Q. Now, let's talk about the statement a  
10 little bit more -- about the telemetry leads.  
11 As you go down the statement it  
12 states, "Okay. And when you say he had to put on the  
13 two (blank)" -- you say, "Uh-huh." Question: "How  
14 many -- how many points of, um, these leads?" And  
15 your answer, "There's five leads."  
16 A. Yes.  
17 Q. Question: "There's five leads?" Answer:  
18 "On our portable monitors," and there's a blank,  
19 correct?  
20 A. Yes.  
21 Q. Did I read that correctly?  
22 A. Yes.  
23 Q. Then you state, "And there's -- so one  
24 basically on top of a, below the clavicle." And your  
25 answer is: "Right here." The detective says,

Page 83

1 "Above, above the breast?" Your answer is: "Yeah,  
2 by the belly area here."  
3 So I guess you're showing him  
4 where the telemetry is, correct?  
5 A. Yes.  
6 Q. Which is basically what you showed us here  
7 today, right?  
8 A. Yes.  
9 Q. And then the detective states, "And then  
10 two, one under each side of the breast?" Your answer  
11 is: "Right." And the detective states, "And then  
12 one in between the breast?" Your answer is, "Right."  
13 Then the detective says, "Okay,  
14 and he always seemed more than willing to" -- and  
15 then you state, "Oh, I'll put that on for you, yup."  
16 That's what you told the  
17 policeman, right?  
18 A. Yes.  
19 Q. But you're telling us here today that  
20 "always" relates to two people.  
21 A. Yes.  
22 Q. But you didn't tell the policeman anything  
23 about two. The word "two" isn't in there, is it?  
24 A. No.  
25 Q. Before your shifts did you meet with the

Page 84

1 other nurses who had the shift before?  
2 A. Yes.  
3 MR. BEMIS: You're speaking at  
4 Centennial, correct?  
5 MR. MURDOCK: At Centennial. I'm  
6 sorry.  
7 BY MR. MURDOCK:  
8 Q. And what is that called?  
9 A. Report.  
10 Q. Report. Would the CNAs be in on report?  
11 A. No.  
12 Q. And the CNAs would answer call lights?  
13 A. Yes.  
14 Q. But the CNAs could also enter in rooms  
15 without the call light being on, right?  
16 A. Yes.  
17 Q. To check on the patients, right?  
18 A. Yes.  
19 Q. And you said before you've never instructed  
20 a CNA to digitally penetrate a vagina, right?  
21 A. No.  
22 Q. Have you ever instructed a CNA to wash a  
23 vagina?  
24 A. Yes. That's part of a bath.  
25 Q. Have you ever instructed a CNA to clean

Page 85

1 someone's anus after they've defecated?  
2 A. Yes.  
3 Q. And you said yourself you don't instruct  
4 CNAs to put on telemetry leads, but you are aware  
5 that that does occur, correct?  
6 A. Yes.  
7 Q. And you said that putting on a telemetry  
8 lead, you don't need to -- or you don't put a  
9 telemetry lead on a nipple, right?  
10 A. No.  
11 Q. Now, when you're moving the breast of a  
12 woman, is it possible to touch the nipple when you're  
13 moving that breast?  
14 MR. BEMIS: I object to form.  
15 THE WITNESS: It depends on how you do  
16 it. If you just go like this with this side of your  
17 hand and slide it up, no.  
18 BY MR. MURDOCK:  
19 Q. Right, if you do it that way?  
20 A. Yes.  
21 Q. But there are other ways that you could  
22 lift the breast and move the breast and be touching  
23 the nipple, correct?  
24 A. I'm sure there could be.  
25 Q. When you were at Centennial Hills, did you

Page 86

1 ever write an incident report?  
2 A. No.  
3 Q. About anything?  
4 A. No.  
5 Q. Did you know how to draft an incident  
6 report?  
7 A. Yes.  
8 Q. How would you have gone about drafting an  
9 incident report?  
10 A. You follow the form.  
11 Q. How do you get that form?  
12 A. You get it from your supervisor or your  
13 charge nurse.  
14 Q. Okay.  
15 MR. MURDOCK: I have nothing further at  
16 this time.  
17  
18 FURTHER EXAMINATION  
19 BY MR. SILVESTRI:  
20 Q. One thing we didn't ask about, did CNAs put  
21 catheters into patients?  
22 A. No.  
23 Q. Including female patients?  
24 A. No, they did not.  
25 Q. And I'm talking about at Centennial Hills.

Page 87

1 A. Yes.  
2 Q. Has that been your general experience at  
3 the hospitals where you've worked?  
4 A. Yes.  
5 MR. MURDOCK: Jim, can I go back and  
6 ask a question about the catheters while you're doing  
7 that?  
8 MR. SILVESTRI: Yes.  
9  
10 FURTHER EXAMINATION  
11 BY MR. MURDOCK:  
12 Q. The catheters -- you said CNAs don't put in  
13 catheters, correct?  
14 A. No, they do not.  
15 Q. Do they ever fix them when they're out of  
16 position?  
17 A. No, they do not.  
18 Q. Okay.  
19  
20 FURTHER EXAMINATION  
21 BY MR. SILVESTRI:  
22 Q. When applying these telemetry leads --  
23 whether you're a nurse, Doctor, CNA, or some other  
24 person applying leads -- are you aware of anybody who  
25 does so where they then fondle the breast and the

Page 88

1 nipple?  
2 MR. MURDOCK: Objection. Speculation.  
3 THE WITNESS: I have no idea what they  
4 do when they put them on.  
5 BY MR. SILVESTRI:  
6 Q. Well, I mean have you ever fondled a female  
7 patient?  
8 A. No. I use the side of my arm. I slide the  
9 breast up and put it down like that.  
10 MR. SILVESTRI: I have nothing further.  
11 MS. HALL: I have nothing further.  
12 MR. BEMIS: No questions.  
13 MR. MURDOCK: I guess you're done. Oh,  
14 you know what? Two things.  
15 What is your telephone number?  
16 THE WITNESS: (702) 743-7043.  
17 MR. MURDOCK: What is your address?  
18 THE WITNESS: 9051 -- oh, God. I just  
19 drew a blank. It starts with an "E."  
20 MR. BEMIS: Is it on your ID?  
21 THE WITNESS: No, it's not. I haven't  
22 got it changed yet. I just moved there recently.  
23 Echelon Point Drive, unit 1006,  
24 Las Vegas, Nevada, 89149.  
25 MR. MURDOCK: You have the right to

Page 89

1 review this deposition. You can make any changes to  
2 your answers that you so desire.

3 I caution you that I or any other  
4 counsel in this matter can comment on the fact that  
5 you made changes, and that may affect your  
6 credibility. Knowing that, you still have a right to  
7 review the deposition and make any changes.

8 If you want to do so, you need to  
9 let the court reporter know and she can make  
10 arrangements for you to review the deposition and  
11 sign. Otherwise you can waive it. It's up to you --  
12 and your counsel, I guess.

13 THE WITNESS: I'll waive it.

14

15 (The deposition concluded at 3:05 p.m.)

16

17

18

19

20

21

22

23

24

25

Page 90

1 REPORTER'S CERTIFICATE

2 STATE OF NEVADA )

) 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 CHRISTINE MURRAY, RN on January 8, 2015 commencing  
8 at the hour of 1:30 p.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 not 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 15th day of January, 2015.

24 *Carol O'Malley*  
25 Carol O'Malley, CCR No. 178



TAB 71



| Page 1 |                                                | Page 3 |                                 |
|--------|------------------------------------------------|--------|---------------------------------|
| 1      | DISTRICT COURT                                 | 1      | APPEARANCES OF COUNSEL (Cont'd) |
| 2      | CLARK COUNTY, NEVADA                           | 2      |                                 |
| 3      | JANE DOE,                                      |        | For Defendant Farmer:           |
| 4      | Plaintiff,                                     | 3      |                                 |
| 5      | vs.                                            |        | CARROLL, KELLY, TROTTER,        |
|        | CASE NO. 09-A-595780                           | 4      | FRANZEN, MCKENNA & PEABODY      |
| 6      | VALLEY HEALTH SYSTEM LLC,                      |        | HEATHER S. HALL, ESQ.           |
| 7      | a Nevada limited                               | 5      | Suite 260                       |
| 8      | liability company, d/b/a                       |        | 8329 W. Sunset Road             |
| 9      | CENTENNIAL HILLS HOSPITAL                      | 6      | Las Vegas, Nevada 89113         |
| 10     | MEDICAL CENTER; UNIVERSAL                      |        | 702.792.5755                    |
| 11     | HEALTH SERVICES, INC., a                       | 7      | 702.796.5855 Fax                |
| 12     | Delaware corporation;                          |        | hshall@cktfmlaw.com             |
| 13     | AMERICAN NURSING                               | 8      |                                 |
| 14     | SERVICES, INC., a                              | 9      |                                 |
| 15     | Louisiana corporation;                         | 10     |                                 |
| 16     | STEVEN DALE FARMER, an                         | 11     |                                 |
| 17     | individual; DOES I                             | 12     |                                 |
| 18     | through X, inclusive; and                      | 13     |                                 |
| 19     | ROE CORPORATIONS I                             | 14     |                                 |
| 20     | through X, inclusive,                          | 15     |                                 |
| 21     | Defendants.                                    | 16     |                                 |
| 22     | -----                                          | 17     |                                 |
| 23     |                                                | 18     |                                 |
| 24     | DEPOSITION OF SAJIT PULLARKAT                  | 19     |                                 |
| 25     |                                                | 20     |                                 |
|        | Friday, August 7, 2015                         | 21     |                                 |
|        | 1:30 p.m.                                      | 22     |                                 |
|        |                                                | 23     |                                 |
|        | 521 S. Third Street                            | 24     |                                 |
|        | Las Vegas, Nevada                              | 25     |                                 |
|        | Carol O'Malley, CCR 178, RMR                   |        |                                 |
| Page 2 |                                                | Page 4 |                                 |
| 1      | APPEARANCES OF COUNSEL                         | 1      | INDEX OF EXAMINATION            |
| 2      | For Plaintiff:                                 | 2      |                                 |
| 3      | MURDOCK & ASSOCIATES, CHTD.                    | 3      | WITNESS: Sajit Pullarkat        |
| 4      | ROBERT E. MURDOCK, ESQ.                        | 4      |                                 |
| 5      | 520 S. Fourth Street                           | 5      |                                 |
| 6      | Second Floor                                   | 6      |                                 |
| 7      | Las Vegas, Nevada 89101                        | 7      |                                 |
| 8      | 702.384.5563                                   | 8      |                                 |
| 9      | 702.384.4570 Fax                               | 9      |                                 |
| 10     | lasvegasjustice@aol.com                        | 10     | EXAMINATION                     |
| 11     |                                                | 11     |                                 |
| 12     | For Defendant Valley Health System LLC, d/b/a  | 12     | By Mr. Murdock                  |
| 13     | Centennial Hills Hospital Medical Center:      | 13     |                                 |
| 14     | HALL PRANGLE & SCHOONVELD, LLC                 | 14     |                                 |
| 15     | JOHN F. BEMIS, ESQ.                            | 15     |                                 |
| 16     | Suite 200                                      | 16     |                                 |
| 17     | 1160 N. Town Center Drive                      | 17     |                                 |
| 18     | Las Vegas, Nevada 89144                        | 18     | INDEX TO EXHIBITS               |
| 19     | 702.889.6400                                   | 19     |                                 |
| 20     | 702.384.6025 Fax                               | 20     | EXHIBITS                        |
| 21     | jbemis@hpslaw.com                              | 21     |                                 |
| 22     |                                                | 22     | None marked.                    |
| 23     | For Defendant American Nursing Services, Inc.: | 23     |                                 |
| 24     | LEWIS BRISBOIS BISGAARD & SMITH LLP            | 24     |                                 |
| 25     | AMANDA J. BROOKHYSER, ESQ.                     | 25     |                                 |
|        | 6385 S. Rainbow Boulevard                      |        |                                 |
|        | Suite 600                                      |        |                                 |
|        | Las Vegas, Nevada 89118                        |        |                                 |
|        | 702.693.4320                                   |        |                                 |
|        | 702.893.3383                                   |        |                                 |
|        | 702.893.3789 Fax                               |        |                                 |
|        | amanda.brookhyser@lewisbrisbois.com            |        |                                 |
|        |                                                |        |                                 |
|        | PYATT & SILVESTRI                              |        |                                 |
|        | JAMES P.C. SILVESTRI, ESQ.                     |        |                                 |
|        | 701 Bridger Avenue                             |        |                                 |
|        | Las Vegas, Nevada 89101                        |        |                                 |
|        | 702.383.6000                                   |        |                                 |
|        | 702.477.0088                                   |        |                                 |
|        | jsilvestri@psh-law.com                         |        |                                 |



800.211.DEPO (3376)  
EsquireSolutions.com

Page 5

1 Deposition of Sajit Pullarkat  
2 August 7, 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 SAJIT PULLARKAT,  
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. Sajit, S-a-j-i-t, Pullarkat,  
16 P-u-l-l-a-r-k-a-t.  
17 Q. Mr. Pullarkat, we're going to be taking  
18 your deposition basically twice. There may be some  
19 rollover between questions and whatnot. We'll work  
20 through that.  
21 The first part of the deposition  
22 is going to be your individual deposition in this  
23 case. The second part is where you're being  
24 presented on behalf of Centennial Hills Hospital as  
25 the person most knowledgeable regarding various

Page 6

1 subjects. Do you understand that?  
2 A. Yes.  
3 Q. Right now we're going to start with your  
4 individual deposition. Okay?  
5 A. Okay.  
6 Q. Have you ever been deposed before?  
7 A. Yes.  
8 Q. On how many occasions?  
9 A. Once.  
10 Q. When was that?  
11 A. Probably about 10 years ago.  
12 Q. What kind of case?  
13 A. It was another hospital case.  
14 Q. Here in town?  
15 A. No.  
16 Q. Where?  
17 A. California.  
18 Q. Was it for any hospital related to UHS?  
19 A. No.  
20 Q. You are currently a CEO, is that correct?  
21 A. Yes.  
22 Q. And you are the CEO of what?  
23 A. Centennial Hills Hospital Medical Center.  
24 Q. And who are you employed by?  
25 A. UHS. Universal Health Services.

Page 7

1 Q. You are not employed by Valley Health  
2 Systems, is that correct?  
3 A. That's correct.  
4 Q. My understanding is that you were not the  
5 CEO of Centennial Hills Hospital back in 2008, is  
6 that correct?  
7 A. That is correct.  
8 Q. My understanding is Mr. Stockton was,  
9 correct?  
10 A. Yes.  
11 MR. MURDOCK: Off the record.  
12 (Discussion off the record.)  
13 BY MR. MURDOCK:  
14 Q. What is a COO? What does that mean?  
15 A. COO is chief operations officer.  
16 Q. And that was back in 2008, correct?  
17 A. Yes.  
18 Q. You were the COO of Centennial Hills  
19 Hospital?  
20 A. Yes.  
21 Q. And as COO of Centennial Hills Hospital  
22 Medical Center you were also employed by Universal  
23 Health Services, is that correct?  
24 A. That's correct.  
25 Q. My understanding is -- and this is a new

Page 8

1 term I've learned -- that the C-Suite is all UHS  
2 personnel, is that correct?  
3 A. That is correct.  
4 Q. It was back then in 2008, and it is now,  
5 right?  
6 A. Yes.  
7 Q. What did the chief operations officer do  
8 back in 2008?  
9 A. The COO is responsible for general  
10 operations within the hospital. They can get  
11 involved with construction projects, expansions,  
12 development, operating of support and ancillary  
13 departments. Those sorts of activities.  
14 Q. If I were to ask you, for example, on a  
15 typical day back in 2008 where nothing out of the  
16 ordinary occurred at the hospital, what would you do?  
17 A. It could go a number of different ways, but  
18 certainly meetings with key department leaders across  
19 the hospital.  
20 For typical COOs that is  
21 departments like radiology, rehabilitation services,  
22 those types of departments that we would interact  
23 with. Meeting with those department leaders to see  
24 how we can continue to perform better, look at  
25 opportunities for growth, development, as well as

Page 9

1 meeting with physicians for opportunities for growth  
2 and development. And then looking at strategic  
3 opportunities to actually build out the facility.  
4 Q. Would you meet with the rest of the  
5 C-Suites at all?  
6 A. Yes.  
7 Q. Would you have, for example -- maybe not a  
8 daily meeting, but a weekly meeting with the  
9 C-Suites?  
10 A. I can't remember. It was either weekly or  
11 biweekly.  
12 Q. Okay. Where would that meeting take place?  
13 A. Within the administrative offices.  
14 Q. In other words, was there a conference room  
15 there? Did you just meet in one room? Did you go  
16 out to lunch?  
17 A. It was a conference room within the  
18 administrative area.  
19 Q. And who would meet either weekly or  
20 biweekly?  
21 A. All members of the C-Suite, being the CEO,  
22 CNO, CFO, COO and AA, which is associate  
23 administrator.  
24 Q. Who was the associate administrator back in  
25 2008, specifically May of 2008, if you know?

Page 10

1 A. That was Karen Folis.  
2 Q. I assume you were involved with the  
3 construction of the hospital?  
4 A. Yes.  
5 Q. And there were some pro formas, I assume,  
6 prior to the construction starting?  
7 A. Yes.  
8 Q. My understanding is that the hospital  
9 opened in January, correct?  
10 A. Yes.  
11 Q. And my understanding is that when the  
12 hospital opened, in terms of community response,  
13 there was a large community response to the hospital,  
14 right?  
15 MR. BEMIS: I object to form. Go ahead  
16 and answer.  
17 MR. MURDOCK: That was a bad question.  
18 Let me rephrase it.  
19 BY MR. MURDOCK:  
20 Q. There was an influx of patients. Would you  
21 agree with that?  
22 A. I guess define "influx of patients."  
23 Q. Well, it filled up pretty fast?  
24 A. It didn't fill up really fast. At opening  
25 we had over 170 beds, so it really didn't fill up

Page 11

1 upon opening.  
2 Q. But at opening you had 170 beds, and when  
3 did it start filling up?  
4 MR. BEMIS: I object to form.  
5 BY MR. MURDOCK:  
6 Q. I don't mean when it was 169 beds, but when  
7 did it start getting busier than you had expected?  
8 A. I honestly don't recall exactly from that  
9 perspective.  
10 Q. Did it take six months to kind of get off  
11 the ground, and all of a sudden that's when you  
12 started seeing those 170 beds fill up?  
13 A. No. I mean we haven't filled up 170 beds  
14 until recently.  
15 Q. What was the expectation when you opened,  
16 in terms of the number of beds being filled?  
17 A. That I don't know. I don't recall.  
18 Q. Could you give me an estimate?  
19 A. I honestly couldn't off the top of my head.  
20 Q. Do you know what an estimate is, as opposed  
21 to a guess?  
22 A. Yes, I do.  
23 Q. But you can't give me one?  
24 A. It would really be hard to estimate.  
25 Q. Well, did you open with 170 beds?

Page 12

1 A. To the best of my knowledge, that's what I  
2 recall.  
3 MS. HALL: I'm sorry, what did you say?  
4 THE WITNESS: To the best of my  
5 knowledge, that's what I recall.  
6 BY MR. MURDOCK:  
7 Q. How many beds do you have now?  
8 A. 190.  
9 Q. My understanding is that in January, when  
10 you opened up, there was only the sixth floor,  
11 seventh floor, and I thought ICU. Would I be correct  
12 in that?  
13 A. No, it had the sixth, seventh and eighth  
14 floors, and critical care, on top of women's  
15 services.  
16 Q. So if you know that, couldn't you estimate  
17 for me the number of beds you opened with?  
18 A. Well, the number of beds we opened with --  
19 like I said, it was around 170.  
20 Q. Well, let me ask you. Maybe it's my  
21 stupidity.  
22 If you just opened with six, seven  
23 and eight, and critical care, ICU, does that equal  
24 170 beds?  
25 A. All those floors with women's services,

| Page 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Page 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 yes.</p> <p>2 Q. Oh, okay. When you opened, did you have</p> <p>3 enough staff to open?</p> <p>4 A. I would say so.</p> <p>5 Q. Was it always the intention of Centennial</p> <p>6 Hills Hospital to use agency staff?</p> <p>7 MR. BEMIS: I object to form. Go ahead</p> <p>8 and answer.</p> <p>9 THE WITNESS: I think just like the</p> <p>10 other 5,000 hospitals across the country, there are</p> <p>11 various times where hospitals need additional support</p> <p>12 and they will certainly use agency or other</p> <p>13 resources.</p> <p>14 BY MR. MURDOCK:</p> <p>15 Q. I don't care about the other 4,999</p> <p>16 hospitals. All I care about is the one hospital.</p> <p>17 So what I'm asking is, was it</p> <p>18 always the idea to use agency staff?</p> <p>19 A. It was never the intention, but again,</p> <p>20 there are periods of times where either you need to</p> <p>21 recruit more staff to help out, or you have seasonal</p> <p>22 spikes in terms of volumes that may hit that may</p> <p>23 require additional support.</p> <p>24 Q. Okay. But you had opened up -- not you</p> <p>25 yourself, but UHS had opened up numerous hospitals</p>                                                           | <p>1 A. Yes, we were alerted when an agency was</p> <p>2 going to be used.</p> <p>3 Q. Did you have to approve it?</p> <p>4 A. No.</p> <p>5 Q. How were you made aware that agencies were</p> <p>6 going to be used?</p> <p>7 A. Agency usage was normally reported through</p> <p>8 the chief nursing officer at the time.</p> <p>9 Q. Now, do you remember the date that</p> <p>10 Centennial Hills opened?</p> <p>11 A. It was in January. I believe it was the</p> <p>12 20th.</p> <p>13 Q. Let's just make that assumption that's when</p> <p>14 it opened.</p> <p>15 The hospital opened on January 20,</p> <p>16 2008. In less than a month Mr. Farmer was being used</p> <p>17 as an agency CNA. You're aware of that, right?</p> <p>18 A. Yes.</p> <p>19 Q. Did you have anything to do with Mr. Farmer</p> <p>20 being allowed to work at the hospital?</p> <p>21 A. No.</p> <p>22 Q. Did you go through an orientation at the</p> <p>23 hospital?</p> <p>24 A. Did I go through an orientation at the</p> <p>25 hospital?</p>                           |
| Page 14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Page 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>1 here in the city. You kind of knew about the flux, I</p> <p>2 would assume.</p> <p>3 A. To a certain extent. Still hospital lines</p> <p>4 are very hard to predict.</p> <p>5 Q. But you know, if McDonald's opens up a</p> <p>6 McDonald's and they run out of hamburgers, they close</p> <p>7 down until they get more hamburgers, right? I mean</p> <p>8 that makes sense.</p> <p>9 So guess the obvious question is,</p> <p>10 if you filled up and you didn't have enough of your</p> <p>11 staff, why did you go out and hire agency staff? Why</p> <p>12 didn't you just hire more staff or close down until</p> <p>13 you got more staff?</p> <p>14 A. As a hospital, we obviously recruit through</p> <p>15 various sources. Sometimes they work, sometimes they</p> <p>16 don't.</p> <p>17 In those cases that they don't, or</p> <p>18 developing newer staff that come onboard that need to</p> <p>19 be oriented, those are times where you would use</p> <p>20 supplemental staffing such as agency.</p> <p>21 Q. Okay. Well, as COO did you have any input</p> <p>22 in the agencies that were going to be used?</p> <p>23 A. Not specifically.</p> <p>24 Q. Did you know agency were going to be used,</p> <p>25 as COO?</p> | <p>1 Q. Yeah.</p> <p>2 A. Yes.</p> <p>3 Q. Who did your orientation?</p> <p>4 A. I had to go through another hospital before</p> <p>5 ours had opened up.</p> <p>6 Q. Maybe you misunderstood my question before.</p> <p>7 Did you go through an orientation</p> <p>8 at Centennial Hills Hospital?</p> <p>9 A. I can't remember if I did a separate one.</p> <p>10 Q. At your C-Suite meetings did someone take</p> <p>11 notes?</p> <p>12 A. There was not necessarily a recorder.</p> <p>13 There was no minutes, per se.</p> <p>14 Q. Okay.</p> <p>15 A. But the CEO typically ran those meetings.</p> <p>16 Q. Was there an agenda?</p> <p>17 A. Yes.</p> <p>18 Q. And how did you find out about the agenda?</p> <p>19 A. There would be discussions either prior to</p> <p>20 or on that particular day.</p> <p>21 Q. Is that something that would be emailed to</p> <p>22 you or something like that?</p> <p>23 A. It varied. It could be just discussions</p> <p>24 within the administrative suite as to what was</p> <p>25 important to talk about.</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 17</p> <p>1 Q. But certainly there was a written agenda,<br/>2 correct?<br/>3 A. Yes.<br/>4 Q. At these meetings did you generally take<br/>5 notes of just what was going on, just for your own<br/>6 knowledge, so to speak?<br/>7 A. There were certainly follow-up items, yes.<br/>8 Q. And I would assume you watched other people<br/>9 take notes, too?<br/>10 A. Sure.<br/>11 Q. That's something that's normal at a<br/>12 meeting, right?<br/>13 A. Yes.<br/>14 Q. Certain especially when you're talking<br/>15 about the administration of a hospital and all of the<br/>16 various C-Suites, right?<br/>17 A. (Witness nods.)<br/>18 Q. Is that a yes?<br/>19 A. Yes.<br/>20 Q. Was there ever a C-Suite meeting where<br/>21 Mr. Farmer was discussed?<br/>22 A. I honestly don't remember.<br/>23 Q. Was there ever a C-Suite meeting where the<br/>24 sexual assault of Roxanne Cagnina was discussed?<br/>25 A. I honestly don't remember.</p>                                                                                                                                                                                  | <p style="text-align: right;">Page 19</p> <p>1 BY MR. MURDOCK:<br/>2 Q. That you can think of?<br/>3 A. I don't know.<br/>4 Q. For instance, was there a murder at the<br/>5 hospital?<br/>6 A. No.<br/>7 Q. Was there a terrorist attack at the<br/>8 hospital?<br/>9 A. No.<br/>10 Q. Was there another sexual assault at the<br/>11 hospital?<br/>12 A. No.<br/>13 Q. Since May 16, 2008 to this day, has there<br/>14 ever been a sexual assault discussed at a C-Suite<br/>15 meeting?<br/>16 A. I honestly can't recall.<br/>17 Q. The typical C-Suite meeting, a typical<br/>18 one -- what is discussed?<br/>19 A. Key items. Equipment, growth, development,<br/>20 key needs across the organization, quality, patient<br/>21 satisfaction, those kinds of things.<br/>22 Q. And would you agree with me pretty much at<br/>23 every C-Suite meeting these are discussed? I mean<br/>24 maybe some more than others, but pretty much those<br/>25 are the categories?</p>                                                                                                                                                         |
| <p style="text-align: right;">Page 18</p> <p>1 Q. Was there ever a C-Suite meeting where the<br/>2 incidents involving Marsha Petersen were discussed?<br/>3 A. I honestly don't recall.<br/>4 Q. Was there a C-Suite meeting regarding an<br/>5 incident involving Denise Hanna? Was that discussed?<br/>6 A. I don't remember.<br/>7 Q. Do you ever remember discussing anything<br/>8 about sexual assaults in any C-Suite meeting?<br/>9 A. Not necessarily in C-Suite meetings.<br/>10 Q. I'm just talking right now about C-Suite<br/>11 meetings.<br/>12 A. I understand.<br/>13 Q. You'd agree with me that sexual assault is<br/>14 a pretty important event, a pretty big event, right?<br/>15 A. (Witness nods.)<br/>16 Q. Is that yes?<br/>17 A. Yes.<br/>18 Q. In between January 20, when the hospital<br/>19 opened, and let's say May 16, 2008, between those two<br/>20 dates -- actually let's go to May 15th, just so we're<br/>21 all clear, okay? So January 20 to May 15, 2008, were<br/>22 there any big events on par with the sexual assault<br/>23 occurring at Centennial Hills Hospital?<br/>24 MR. BEMIS: I object to form. You can<br/>25 answer.</p> | <p style="text-align: right;">Page 20</p> <p>1 A. Pretty much, yes.<br/>2 Q. Are the financials discussed?<br/>3 A. Not so much. It's more those items I<br/>4 discussed.<br/>5 Q. But within these items, equipment, growth,<br/>6 development -- and especially growth and<br/>7 development -- that's certainly financial?<br/>8 A. There's certainly an aspect to it, yes.<br/>9 Q. If quality and patient satisfaction were a<br/>10 part of these categories, wouldn't you agree with me<br/>11 it's more likely than not that the incident regarding<br/>12 Steven Farmer was discussed at these meetings?<br/>13 MR. BEMIS: Objection to form. Calls<br/>14 for speculation.<br/>15 THE WITNESS: Like I said before, I<br/>16 can't recall.<br/>17 BY MR. MURDOCK:<br/>18 Q. I'm just trying to figure out why you can't<br/>19 recall this. I mean unless it's so common to have<br/>20 sexual assaults at your hospital, I'm trying to<br/>21 figure out how you would not remember that.<br/>22 MR. BEMIS: Objection to form.<br/>23 Argumentative.<br/>24 BY MR. MURDOCK:<br/>25 Q. Can you give me any rationale for that?</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 21</p> <p>1 A. I just can't recall.</p> <p>2 Q. Okay. But of course, the good thing is we</p> <p>3 don't have to rely on memories because you would take</p> <p>4 notes, and you watched other people take notes,</p> <p>5 right?</p> <p>6 A. (Witness nods.)</p> <p>7 Q. Is that a yes?</p> <p>8 A. Yes.</p> <p>9 Q. So I could go take a look at your notes</p> <p>10 from back in let's say May of 2008, and we could find</p> <p>11 out whether or not the Farmer incidents were</p> <p>12 discussed at the C-Suite meetings, correct?</p> <p>13 A. Correct.</p> <p>14 Q. I could also go look at the agendas, right?</p> <p>15 A. Correct.</p> <p>16 Q. Where are your notes?</p> <p>17 A. Most of them were tabulated on paper, and</p> <p>18 then they were typically followed up with</p> <p>19 individuals, based upon what needed to happen.</p> <p>20 Q. Okay. I don't understand. You said "notes</p> <p>21 are tabulate." What does that mean?</p> <p>22 A. I'm sorry, most of my notes are on paper,</p> <p>23 as the tablet that's in front of you. It would be</p> <p>24 recorded on something like that.</p> <p>25 Q. So you would have a legal pad or something</p> | <p style="text-align: right;">Page 23</p> <p>1 can't remember. Is there any other way I could find</p> <p>2 out what was discussed at those meetings, if anything</p> <p>3 was discussed regarding Farmer or the incidents?</p> <p>4 A. I'm not sure. I'm really not sure.</p> <p>5 Q. When was the first time you met with</p> <p>6 counsel regarding this matter? The first time.</p> <p>7 A. I know a lot of the initial meetings were</p> <p>8 with the former CEO, Kevin Stockton. So a lot of the</p> <p>9 initial meetings were with him, from a legal</p> <p>10 perspective.</p> <p>11 MR. BROOKHYSER: I'm sorry, can you</p> <p>12 speak up a little louder? I'm having a hard time</p> <p>13 hearing.</p> <p>14 THE WITNESS: I'm sorry. A lot of the</p> <p>15 initial meetings were with the present CEO at the</p> <p>16 time, Kevin Stockton.</p> <p>17 BY MR. MURDOCK:</p> <p>18 Q. How do you know that?</p> <p>19 A. Just based upon interactions and where the</p> <p>20 detail would typically be delegated to.</p> <p>21 Q. Were you present during those meetings?</p> <p>22 A. No.</p> <p>23 Q. I'm sorry?</p> <p>24 A. No.</p> <p>25 Q. When was the first time you became aware</p>         |
| <p style="text-align: right;">Page 22</p> <p>1 like that?</p> <p>2 A. Correct.</p> <p>3 Q. What would you do with them then?</p> <p>4 A. Then I would take that back and act upon</p> <p>5 the key follow-up items.</p> <p>6 Q. And then what would you do with the notes?</p> <p>7 A. It would just be a reminder to me just to</p> <p>8 follow up with those key people or key items.</p> <p>9 Q. But if I'm asking for those notes, for</p> <p>10 example, where are you going to go look to find them?</p> <p>11 A. Once I was done with the follow-up items I</p> <p>12 wouldn't have the paper anymore.</p> <p>13 Q. Why not?</p> <p>14 A. Because I would have finished the task and</p> <p>15 followed up.</p> <p>16 Q. What would you have done with the paper?</p> <p>17 A. I would probably have thrown it out or</p> <p>18 shredded it or whatever.</p> <p>19 Q. Do you know if you did shred it or throw it</p> <p>20 out in this instance? And I'm talking basically</p> <p>21 right after the incident -- May, June of 2008.</p> <p>22 A. I would probably say yes.</p> <p>23 Q. You probably threw it out?</p> <p>24 A. Probably, yes.</p> <p>25 Q. So you threw out the documents, and you</p>          | <p style="text-align: right;">Page 24</p> <p>1 that counsel had been assigned to this matter for</p> <p>2 UHS?</p> <p>3 A. I don't remember exactly when.</p> <p>4 Q. If the incident occurred on May 16th, 15th,</p> <p>5 or whatever it is, and it was reported within five</p> <p>6 days up to your server for risk management -- I</p> <p>7 forget what it's called, Star Enterprise, or</p> <p>8 Enterprise or something -- and then you would get</p> <p>9 back an assignment of counsel, would you agree with</p> <p>10 me that you would have known that a counsel was</p> <p>11 assigned to this matter within let's say at least 30</p> <p>12 days of the incident? Is that reasonable?</p> <p>13 A. Possibly.</p> <p>14 Q. Would it be reasonable to say two weeks?</p> <p>15 A. I don't know.</p> <p>16 Q. You don't know if it's reasonable?</p> <p>17 A. It could be. I just can't recall exactly.</p> <p>18 Q. Do you have a calendar?</p> <p>19 A. I do.</p> <p>20 Q. Did you ever meet with counsel?</p> <p>21 A. Not initially, no.</p> <p>22 Q. When was the first time you met with</p> <p>23 counsel?</p> <p>24 A. My first meetings with counsel didn't</p> <p>25 happen until recently.</p> |

Page 25

1 Q. Okay. So your first meetings with  
2 counsel -- when you say "recently," within a year,  
3 let's say?  
4 A. Yes.  
5 Q. Within six months?  
6 A. Yes.  
7 Q. Within three months?  
8 A. Probably six.  
9 Q. Somewhere between three and six months.  
10 Would you agree with that?  
11 A. Yes.  
12 Q. That's reasonable, right?  
13 A. (Witness nods.)  
14 Q. Is that a yes?  
15 A. Yes.  
16 Q. That was your first meeting with counsel,  
17 but certainly you're aware that counsel was involved  
18 in this from way early on?  
19 A. Correct.  
20 Q. What is the document destruction policy at  
21 UHS?  
22 A. I don't know what you're referring to  
23 specifically.  
24 Q. Well, when can you destroy documents?  
25 Seven years, five years? What are we talking about

Page 26

1 here? What do you do at UHS?  
2 A. I don't know the specifics on it. I know  
3 for patient files and patient records, there are  
4 differences between that and --  
5 Q. No, I'm not asking about that. I'm asking  
6 about your documents. There's a policy in place, I  
7 would assume at UHS, for document destruction.  
8 A. I'm not aware what the policy states on  
9 document destruction.  
10 Q. You're the CEO of the hospital, right?  
11 A. Yes.  
12 Q. And on today's date you can't tell me what  
13 the document destruction policy is regarding your  
14 notes?  
15 MR. BEMIS: I object to form.  
16 Argumentative.  
17 THE WITNESS: No.  
18 BY MR. MURDOCK:  
19 Q. Why did you throw these notes out?  
20 MR. BEMIS: I object to form. Asked  
21 and answered. Go ahead.  
22 THE WITNESS: Like I said before, once  
23 items are completed or followed up on, the task was  
24 essentially considered completed, finished.  
25

Page 27

1 BY MR. MURDOCK:  
2 Q. Did you have tasks at all with regard to  
3 the Steven Farmer issues? In other words, in terms  
4 of investigation, in terms of getting meetings  
5 together, anything?  
6 A. Yes.  
7 Q. What were your tasks regarding Steven  
8 Farmer?  
9 A. I was initially notified via our security  
10 department of the incident, and from that point met  
11 with getting together with the other leaders of the  
12 organization.  
13 Number one, obviously report the  
14 incident; and number two, get our committees  
15 together, that being the patient safety committee and  
16 perform a root cause analysis.  
17 Q. So just so I'm clear, so your job, when you  
18 were immediately notified -- and you were immediately  
19 notified about the incident the day of the incident,  
20 correct?  
21 A. Yes.  
22 Q. Within minutes of security being notified  
23 you were notified, correct?  
24 A. Right.  
25 Q. So you were aware within minutes, right?

Page 28

1 A. Yes.  
2 Q. Did you ever instruct security to go maybe  
3 talk to the other patients in the hospital to find  
4 out if they had any interactions or negative  
5 interactions with this rapist?  
6 MR. BEMIS: I object to form.  
7 THE WITNESS: No.  
8 BY MR. MURDOCK:  
9 Q. Why not?  
10 A. For me, security was more about reviewing  
11 the details of the incident, what happened, and  
12 taking the next appropriate steps.  
13 Q. But you had other patients in the hospital,  
14 right?  
15 A. Correct.  
16 Q. You had other patients I assume you knew  
17 who had dealings with Mr. Farmer, one way or the  
18 other, right?  
19 A. Correct.  
20 Q. He was a CNA at your hospital, right?  
21 A. Yes.  
22 Q. So you knew because he was a CNA at your  
23 hospital that he had patient contact at your  
24 hospital, right?  
25 A. Yes.

Page 29

1 Q. Knowing that, wouldn't you want to instruct  
2 security and say, "Hey, let's go walk around and find  
3 out if he did anything bad to anybody else?"  
4 A. I know that other investigations were  
5 occurring more from a nursing perspective, as I  
6 recall.  
7 Q. Okay. We'll get back to that.  
8 But let's get back to my question,  
9 which is, knowing what you knew, was there a specific  
10 reason that you can point to, that you didn't  
11 instruct security or anybody to go talk to patients  
12 and find out if Farmer had done anything wrong to  
13 anybody else?  
14 A. No specific reason. Really, because of the  
15 investigation process and the way it was occurring,  
16 my recollection is it was more on the nursing side.  
17 Q. What was more on the nursing side?  
18 A. Reviewing through the incident details,  
19 patients, et cetera.  
20 Q. So you expected the nursing investigators  
21 component to actually do that, to actually go around  
22 the hospital and patients to find out if anybody else  
23 had a problem. Is that correct?  
24 MR. BEMIS: I object to form.  
25 Misstates testimony.

Page 30

1 THE WITNESS: That's what I recall.  
2 BY MR. MURDOCK:  
3 Q. You recall that I'm correct?  
4 A. That's what I recall.  
5 Q. I just want to make sure we're on the same  
6 page, that you're recalling what I just said, which  
7 is it was your expectation that whoever was in charge  
8 of the nursing investigation would have gone around  
9 to the patients in the hospital to find out if indeed  
10 Farmer had done anything wrong to any other patients.  
11 Is that correct?  
12 MR. BEMIS: I object to form.  
13 Misstates testimony. Go ahead and answer.  
14 THE WITNESS: Correct.  
15 BY MR. MURDOCK:  
16 Q. Okay. Thank you.  
17 When you were notified by  
18 security, where were you?  
19 A. I don't remember specifically where I was  
20 at the time.  
21 Q. I don't mean -- that's not a "where were  
22 you when Kennedy was shot" type of thing. That's not  
23 what I was asking.  
24 What I was really asking is, in  
25 other words, were you in the hospital? Were you at

Page 31

1 home? Things like that.  
2 A. I don't recall.  
3 Q. Let's put it this way.  
4 Within 24 hours after you were  
5 notified of this incident did you do a Midas report?  
6 A. I did not do a Midas report, but a Midas  
7 report I know was being filed.  
8 Q. That's not what I asked you. I just asked  
9 you if you did one.  
10 A. I did not.  
11 Q. Why not?  
12 A. Our processes already had established that  
13 my report was being inputted.  
14 Q. Well, I don't understand.  
15 Then is a Midas report -- is there  
16 just one report? Only one person can do one for an  
17 incident?  
18 A. No, it doesn't have to be just one, but  
19 it's certainly initiated by one.  
20 Q. Well, why didn't you do one immediately  
21 when you found out about the incident?  
22 MR. BEMIS: I object to form. Asked  
23 and answered. Go ahead.  
24 THE WITNESS: Again, the process for a  
25 Midas report is that someone initiates the process.

Page 32

1 My understanding is that was being  
2 done already, so there was no need to be duplicative  
3 at that juncture.  
4 BY MR. MURDOCK:  
5 Q. At some point in time between 2008 and  
6 today, I assume you found out that other people  
7 besides Roxanne Cagnina were alleging that Mr. Farmer  
8 had sexually assaulted them at Centennial Hills  
9 Hospital, is that correct?  
10 A. I had heard the allegations, yes.  
11 Q. We're here today about one, right?  
12 A. Yes.  
13 Q. You know that, right?  
14 A. Yes.  
15 Q. You know why we're here today?  
16 A. I know why we're here.  
17 Q. When did you find out about -- let's take  
18 Marsha Petersen. When did you find out about this  
19 case?  
20 A. I honestly don't recall.  
21 Q. Well, did you find out in 2009, 2008? What  
22 are we talking about here?  
23 A. I don't specifically recall.  
24 Q. Can you give me an estimate? What's your  
25 best estimate of when you found out that Marsha



Page 33

1 Petersen was sexually assaulted by Steven Farmer  
2 while she was at Centennial Hills Hospital?  
3 A. I don't know.  
4 Q. You can't give me an estimate?  
5 A. No.  
6 Q. Now, let's try and narrow this down a  
7 little bit.  
8 When did you become aware of this  
9 lawsuit that we're here for in this case?  
10 A. I don't know. Maybe a year. I'm not sure.  
11 Q. If I told you that this lawsuit was filed  
12 basically within a year -- maybe a little more, I  
13 can't remember, maybe a little bit more, maybe a  
14 little less -- let's say in 2009. The incident  
15 occurred in 2008; this lawsuit was filed sometime in  
16 2009.  
17 Would that be reasonable?  
18 A. That would be reasonable.  
19 Q. So would it be reasonable for you to tell  
20 me that you found out about the lawsuit right around  
21 the time it was filed and served? Within a short  
22 time? Wouldn't you agree with that?  
23 A. Within a short time.  
24 Q. So when you found out about this lawsuit,  
25 did you know that this lawsuit was alleging that

Page 34

1 Steven Farmer, when he was working at Centennial  
2 Hills Hospital, sexually assaulted Jane Doe? That's  
3 the person here, Marsha Petersen.  
4 Did you know that?  
5 A. Yes.  
6 Q. When you found that out, did you do a Midas  
7 report?  
8 A. No.  
9 Q. Why not?  
10 A. I didn't feel it necessary that finding out  
11 that initiates a Midas report.  
12 Q. When so you find out about an event,  
13 whether it's 24 hours after the event or five years  
14 afterwards, don't you have a duty to go do that Midas  
15 report?  
16 MR. BEMIS: I object to form.  
17 Argumentative.  
18 THE WITNESS: Midas reports are  
19 typically done when there is an identified incident  
20 within the hospital campus. Those are when those are  
21 performed.  
22 BY MR. MURDOCK:  
23 Q. So let me see if I understand this.  
24 The CEO of Centennial Hills  
25 Hospital finds out about an incident where a former

Page 35

1 patient is alleging that she was sexually assaulted  
2 by someone who was working at Centennial Hills  
3 Hospital in 2008 -- you find out in 2009, but you  
4 don't believe you have a duty to do a Midas report at  
5 that point. Is that correct?  
6 A. That's correct.  
7 Q. Okay. So you get this call from security,  
8 and you said that -- I think I got this right, maybe  
9 I got it wrong, I'm not trying to do anything here --  
10 but you said you were immediately notified by the  
11 security department, and then from that point you  
12 started meeting with other leaders of the  
13 organization?  
14 A. Correct.  
15 Q. And you met with other leaders of the  
16 organization regarding the Steven Farmer incident,  
17 right?  
18 A. Correct.  
19 Q. Who did you meet with?  
20 A. It was a multitude of leaders across the  
21 organization. C-Suite, regulatory risk.  
22 Q. Is regulatory risk the same thing, or is  
23 that separate?  
24 A. I think at the time it was the same, I  
25 believe.

Page 36

1 Q. Who was regulatory risk? Was that Janet  
2 Callahan?  
3 A. Yes.  
4 Q. Did C-Suite have a meeting, or were you  
5 just on the phone from one to the next to the next to  
6 the next?  
7 A. We talked together initially to report the  
8 incident out formally, and then to begin the process  
9 of getting together a patient safety committee and  
10 perform the RCA.  
11 Q. When you say you got together initially to  
12 report the incident out, who was that going to? When  
13 you say you were going to report the incident out,  
14 what is that talking about?  
15 A. That's reporting the incident to the state.  
16 Q. And how was that going to be done?  
17 A. Basically we're self-reporting the  
18 incident, so --  
19 Q. Did you make a phone call? How did that  
20 work?  
21 A. I didn't witness the detail.  
22 Q. What was the decision of the committee?  
23 How were you going to do it?  
24 A. The CEO was on technically on that.  
25 Q. Was he to call them, write them? What was

Page 37

1 the deal?  
2 A. I assume call, and certainly in partnership  
3 with the regulatory risk folks.  
4 Q. And who at the State of Nevada did you  
5 call? Who was that supposed to be?  
6 A. I did not contact, so I don't know.  
7 Q. I know you didn't, but who would you call?  
8 You said you had it reported to the state. You don't  
9 call Brian Sandoval and say, "Hey, we've got a  
10 problem here."  
11 A. Whoever the head of the state department  
12 was at the time.  
13 Q. The state department of what?  
14 A. Of health.  
15 Q. That's who you called, the State Department  
16 of Health?  
17 A. Yes.  
18 Q. Is that what its actual title is, State  
19 Department of Health? Is that part of like the  
20 Division of Business and Industry or --  
21 A. I'm not positive on the exact title.  
22 Q. If someone came to you today and said,  
23 "Hey, we've got a sexual assault, we've got to report  
24 it," who would you call up?  
25 A. I believe it is State Department of Health,

Page 38

1 but I'm not positive on the exact articulation of the  
2 titling there.  
3 Q. Okay. And why would you tell them?  
4 A. It was certainly an incident that happened  
5 on our campus that was serious, so we wanted to  
6 report that out as it was necessary.  
7 Q. When the C-Suite got together to decide  
8 what to do, outside of the C-Suite, was somebody on  
9 the phone, for instance, from King of Prussia?  
10 A. I don't recall.  
11 Q. When I say King of Prussia, you know what  
12 I'm talking about?  
13 A. Yes.  
14 Q. UHS main, right?  
15 A. I don't recall that specifically.  
16 Q. You're not saying it didn't occur, you're  
17 just saying you're not sure?  
18 A. I'm not sure.  
19 Q. But at the very least it was the C-Suite.  
20 Did you talk about how this was  
21 going to be dealt with in the press? I'm sure you  
22 figured it would get out to the press, right?  
23 A. I don't remember specific conversations  
24 about the press components.  
25 Q. Did somebody draft a press release?

Page 39

1 A. I honestly don't remember.  
2 Q. Okay. Well, so the C-Suite got together  
3 and you had to report the incident to the state, and  
4 that's what you did, right?  
5 A. Yes.  
6 Q. So that meeting lasted like 30 seconds,  
7 because all you did was say, "Hey, go report it to  
8 the state?"  
9 A. It was pretty quick.  
10 Q. How long did you talk? A minute, 30  
11 seconds?  
12 A. No, it was probably a little longer than  
13 that.  
14 Q. How long?  
15 A. Maybe 10, 20 minutes.  
16 Q. Did you take notes from that meeting?  
17 A. I probably did, yes.  
18 Q. And where are those notes today?  
19 A. I probably don't have them at this  
20 juncture.  
21 Q. Why not?  
22 A. Again, most of the notes were to follow up  
23 on items or just to figure out what the next steps  
24 were. So the next steps were to go to an RCA, so we  
25 went to an RCA.

Page 40

1 Q. What's an RCA?  
2 A. Root cause analysis. The next step was to  
3 go to the patient safety committee, so we went to the  
4 patient safety committee. So there was no need to  
5 keep that note necessarily.  
6 Q. Well, we'll see about that.  
7 But in terms of a 10 to 20-minute  
8 meeting, I'm sure everybody got something assigned to  
9 them. Wouldn't that be correct?  
10 MR. BEMIS: I object to form. Calls  
11 for speculation.  
12 BY MR. MURDOCK:  
13 Q. Maybe not everybody, but jobs were given  
14 out?  
15 A. I don't recall specifics. Certainly the  
16 call to the state was definitely first and foremost.  
17 Q. Okay. And then you said that you all  
18 figured you needed to get together to do the root  
19 cause analysis. Anything else?  
20 A. Root cause analysis, patient safety  
21 committee to make sure it was fully discussed,  
22 reviewed, investigated, and to identify any  
23 opportunities for improvement obviously.  
24 Q. Okay. Were any improvement ideas  
25 identified?

Page 41

1 MR. BEMIS: Are we talking about  
2 results of the patient safety meeting, investigation  
3 of RCAs or --  
4 MR. MURDOCK: Well, let me ask it this  
5 way.  
6 BY MR. MURDOCK:  
7 Q. As a result of this incident were any  
8 policies and procedures changed?  
9 A. I'm trying to think. I'm not positive.  
10 Q. Can you think about some ideas that might  
11 have? What are you thinking of here?  
12 A. I don't think so, but I'm not positive.  
13 Q. In your 10 to 20-minute meeting that the  
14 C-Suite had, did anybody ask, "Why was this guy  
15 working here?"  
16 A. Again, I don't remember the specifics of  
17 the conversation.  
18 Q. Did anybody ask, "How did this guy get to  
19 work here?"  
20 A. I'm not sure.  
21 Q. Did you pull his file for the C-Suite  
22 meeting, so you all would have something to kind of  
23 know who this guy was?  
24 A. I don't recall that being pulled for the  
25 meeting.

Page 42

1 Q. Were any documents given out at the meeting  
2 to everybody? His picture, his badge, anything?  
3 A. I don't recall a picture or the badge. I  
4 know that the security report was there.  
5 Q. Okay. Good. So the security report was  
6 there.  
7 But did anybody bring up the  
8 question of, "How did this guy get to work in our  
9 hospital?"  
10 A. I don't know. I'm trying to remember. I  
11 can't recall specifically. Like I said, it was a  
12 very quick meeting.  
13 Q. 10 to 20 minutes.  
14 A. State calls were important, following up  
15 with the regulatory processes were important, the  
16 security report was there. I just can't remember the  
17 specifics you're looking for.  
18 Q. I'm just trying to figure out, did somebody  
19 ask, "Hey, what was this guy doing here? How did  
20 this guy get into our hospital?" Was that question  
21 even asked?  
22 MR. BEMIS: I object to form. Asked  
23 and answered.  
24 MR. MURDOCK: Well, it was asked, but  
25 it wasn't answered.

Page 43

1 BY MR. MURDOCK:  
2 Q. Go ahead.  
3 A. I just don't remember specifics.  
4 Q. Of course your notes might have the  
5 specifics on them, the ones you wrote, right?  
6 MR. BEMIS: I object to form.  
7 Argumentative.  
8 THE WITNESS: They could have.  
9 BY MR. MURDOCK:  
10 Q. So did anybody at the meeting bring up  
11 maybe calling American Nursing Services?  
12 A. I don't know if it had gotten that far at  
13 that point.  
14 Q. Did you know that Mr. Farmer was an agency  
15 worker at that point in time?  
16 A. We found out certainly.  
17 Q. No, at that meeting.  
18 A. At that meeting?  
19 Q. At the initial C-Suite meeting.  
20 A. I believe it was.  
21 Q. And did anybody bring up, "Hey, let's call  
22 ANS to find out what this guy's background is," et  
23 cetera?  
24 A. (No response.)  
25 Q. In other words, did Stockton -- Stockton I

Page 44

1 assume was running the meeting, correct?  
2 A. Correct.  
3 Q. Did Stockton say, "Hey, let's get ANS on  
4 the horn here and find out what happened? Did that  
5 occur at all?  
6 A. I know he was identified. I know the  
7 security report was there. I know he was identified  
8 as an agency person. I know the state call was made.  
9 I know that -- I believe it was HR nurses that were  
10 going to look into the background of Mr. Farmer.  
11 Q. How do you know that?  
12 A. Because they're nursing and obviously  
13 they're integrally involved.  
14 Q. But you specifically said just now, "I knew  
15 HR nursing was going to look into the background."  
16 How do you know that?  
17 A. Because they were there at the meeting.  
18 Q. Who was there?  
19 A. The CNO and HR.  
20 Q. Okay. I didn't know HR was there. Who is  
21 HR?  
22 A. Human resources.  
23 Q. No, I know that, but who was there  
24 representing HR?  
25 A. I can't recall the name. It was the HR

Page 45

1 director at the time.  
2 Q. But Carol Butler was the CNO, right?  
3 A. That's correct.  
4 Q. She's the chief nursing office, and it was  
5 her job, she was going to be looking into the  
6 background of Mr. Farmer, right?  
7 A. Yes.  
8 Q. And she was to do that on behalf of the  
9 C-Suite, right?  
10 A. Correct.  
11 Q. And I assume she was going to get back to  
12 you at some point in time, is that correct, with her  
13 investigation?  
14 A. She was going to follow up, yes.  
15 MR. BEMIS: I object to form, anything  
16 related to patient safety.  
17 MR. MURDOCK: Well, wait a minute.  
18 We're not talking about patient safety. He didn't  
19 say she was part of patient safety. He said HR  
20 nursing was going to look into it.  
21 BY MR. MURDOCK:  
22 Q. Let me ask the question.  
23 Was that part of the patient  
24 safety committee, that was going to look into the  
25 background of Mr. Farmer? Or was that just HR

Page 46

1 nursing? We're going to go pull his file and look  
2 into it?"  
3 A. HR and nursing investigating was certainly  
4 part of the patient safety meetings.  
5 Q. Oh, are they part of the patient safety  
6 committee?  
7 A. They were there, yes.  
8 Q. But are they officially a part of it?  
9 A. The CNO and the HRA or HR director would  
10 participate when necessary.  
11 Q. So that was part of patient safety then.  
12 Is that what you're telling me?  
13 A. Yes.  
14 Q. Did you personally ever find out how  
15 Mr. Farmer came to work at your hospital when you  
16 were the COO?  
17 A. The pieces I knew or was alerted to was he  
18 came to us through an agency.  
19 Q. Right.  
20 A. And I also think, as you had mentioned  
21 before, he was a CNA that came onboard. So I did  
22 know those pieces.  
23 Q. You're aware that agency workers, when they  
24 come to your hospital there's certain required  
25 documents they must have.

Page 47

1 A. Yes.  
2 Q. Health forms, right? That's one of the  
3 things?  
4 A. (Witness nods.)  
5 Q. Right?  
6 A. Yes.  
7 Q. Referrals, references from the last job,  
8 right?  
9 A. Yes.  
10 Q. Did you ever find out whether or not he  
11 actually had references from his last job in the  
12 file?  
13 A. I know we looked at his file.  
14 MR. BEMIS: With respect to your  
15 personal knowledge, not as to the other part of your  
16 deposition.  
17 THE WITNESS: I wouldn't know.  
18 BY MR. MURDOCK:  
19 Q. I'm sorry?  
20 A. I wouldn't know until we look at the  
21 personnel file.  
22 Q. Well, did you ever look at the personnel  
23 file yourself? I'm talking within let's say a year  
24 of this happening. Not getting ready for this  
25 deposition today, within a year of this happening.

Page 48

1 Did you find out, "Hey, we never  
2 got references for this guy, and he should never have  
3 been working at our hospital?"  
4 A. I didn't look at the specifics of the  
5 personnel file, no.  
6 Q. Okay. So in other words, before you were  
7 prepped to become the person most knowledgeable that  
8 we're going to be discussing in a little bit on  
9 various subjects, you were unaware that Mr. Farmer  
10 was missing documents from his personnel file,  
11 correct?  
12 A. That's correct.  
13 Q. Did you ever meet with Amy Bochenek  
14 regarding this matter?  
15 A. No.  
16 Q. Do you know who Amy Bochenek is?  
17 A. Yes.  
18 Q. I think I'm pronouncing it right.  
19 A. Yes.  
20 Q. You never met with her?  
21 A. No.  
22 Q. Outside of the first meeting with the  
23 C-Suite, did you ever meet with Carol Butler in this  
24 matter?  
25 MR. BEMIS: You mean outside of the

Page 49

1 patient safety meeting and the RCA?  
2 MR. MURDOCK: Yeah.  
3 THE WITNESS: No.  
4 BY MR. MURDOCK:  
5 Q. Are you part of the patient safety  
6 committee?  
7 A. Yes.  
8 Q. Are you part of the root cause analysis  
9 committee? I guess that's what they call it.  
10 A. Yes.  
11 Q. Okay. Let me ask you this.  
12 Without telling me specifically  
13 what's in the root cause analysis, I assume you've  
14 seen the root cause analysis. Is that correct?  
15 A. Yes.  
16 Q. Who drafted the root cause analysis?  
17 A. I believe it was our quality risk, but I'm  
18 not positive.  
19 Q. Is that Ms. Callahan?  
20 A. I believe so.  
21 Q. And Ms. Callahan left at some point and  
22 Evette Wilson came in, right?  
23 A. Yes.  
24 Q. Ms. Callahan, was she a UHS employee?  
25 A. No, she was a Centennial Hills Hospital

Page 50

1 employee.  
2 Q. Evette Wilson, was she a UHS employee?  
3 A. No, she was a Centennial Hills employee.  
4 Q. Okay. So let me see if I have this clear.  
5 There was a root cause analysis  
6 drafted?  
7 A. (Witness nods.)  
8 Q. Is that a yes?  
9 A. Yes.  
10 Q. That root cause analysis was drafted by  
11 Centennial Hills Hospital employees, correct?  
12 A. Yes.  
13 Q. And that root cause analysis was shared  
14 from Centennial Hills Hospital employees with UHS of  
15 Delaware, Inc. employees, is that correct?  
16 A. That's correct.  
17 Q. You would agree with me, wouldn't you, that  
18 UHS of Delaware, Inc. is a separate entity than  
19 Valley Health Systems, Inc., or LLC, or whatever it  
20 is?  
21 MR. BEMIS: I object. Calls for a  
22 legal conclusion.  
23 BY MR. MURDOCK:  
24 Q. I would expect the COO and CEO to know  
25 that, but --

Page 51

1 A. It's a separate component.  
2 Q. It's a separate entity?  
3 A. Correct.  
4 Q. Different tax IDs?  
5 A. Yes.  
6 Q. Is there a policy and procedure regarding  
7 root cause analyses at Centennial Hills Hospital? In  
8 other words, how they're drafted, who drafts them,  
9 things like that?  
10 A. I believe there is.  
11 Q. And does that policy and procedure state  
12 that the root cause analysis, which is done by  
13 Centennial Hills Hospital employees, will be shared  
14 with UHS of Delaware, Inc. employees?  
15 A. I don't know if it necessarily delineates  
16 it out to that extent.  
17 Q. Do you know who owns Valley Health System?  
18 A. In terms of?  
19 Q. Well, does UHS own it?  
20 A. That's my understanding.  
21 Q. Is Valley Health System a subsidiary of UHS  
22 of Delaware, or is it a subsidiary of UHS, Inc., or  
23 any other million entities that UHS may have?  
24 MR. BEMIS: I object to form. It calls  
25 for a legal conclusion.

Page 52

1 MR. MURDOCK: I'm asking the CEO. I  
2 assume the CEO would know that.  
3 THE WITNESS: I honestly don't know.  
4 BY MR. MURDOCK:  
5 Q. The CEO of the hospital does not know. Is  
6 that what you're tell me?  
7 A. Yes.  
8 Q. Okay. Do you know who Margaret Wolfe is?  
9 A. No.  
10 Q. Do you know who Ray Sumera is?  
11 A. No.  
12 Q. Do you know who Christine Murray is?  
13 A. No.  
14 Q. When did you become CEO of the hospital?  
15 A. It was 2010 or '11.  
16 Q. Have you reviewed this case at all since  
17 you became CEO? I'm not asking you for contents or  
18 discussions between counsel, but have you reviewed  
19 anything about this case?  
20 MR. SILVESTRI: That includes with  
21 counsel?  
22 MR. MURDOCK: Yeah, it does.  
23 THE WITNESS: Well, counsel, certainly.  
24 BY MR. MURDOCK:  
25 Q. What have you reviewed?

Page 53

Page 55

1 MR. BEMIS: You're talking about  
2 outside of preparation for this afternoon?  
3 MR. MURDOCK: Oh, yeah, outside of  
4 preparation for this afternoon.  
5 THE WITNESS: Nothing with legal  
6 counsel outside of this afternoon's preparation.  
7 BY MR. MURDOCK:  
8 Q. And my understanding from your answers  
9 before is you really had nothing to do with this case  
10 at all in terms of meeting with counsel, until you  
11 started getting prepared for this deposition. Is  
12 that right?  
13 A. That's correct.  
14 Q. Or for the next deposition, is that  
15 correct?  
16 A. Correct.  
17 MR. MURDOCK: Let's take a break for a  
18 minute.  
19 (Recess.)  
20 BY MR. MURDOCK:  
21 Q. Outside of the safety committee and the  
22 root cause analysis committee, and besides what we're  
23 going to talk about in the other deposition, do you  
24 have any other knowledge at all regarding Mr. Farmer?  
25 What he was doing at the hospital, the incidents,

Page 54

1 anything?  
2 A. No. We've covered those areas.  
3 Q. Okay. When you found out about Marsha  
4 Petersen and her allegations in this lawsuit, what  
5 did you do, if anything?  
6 A. This lawsuit honestly came to my attention  
7 more recently, just in terms of my own involvement  
8 with it. My initial components were my own  
9 preparation, and so forth.  
10 Q. But you said earlier that you became aware  
11 of this, of Marsha Petersen and her allegations,  
12 within a year. Remember we put that time limit on  
13 it?  
14 A. (Witness nods.)  
15 Q. Is that a yes?  
16 A. Yes.  
17 Q. So when you found out, in other words, did  
18 you have another C-Suite meeting regarding Marsha  
19 Petersen this time, as opposed to Roxanne Cagnina?  
20 A. I don't recall specifically.  
21 Q. Was the state notified again?  
22 A. I don't believe so.  
23 Q. Why not?  
24 A. The reason being is that we had obviously  
25 performed an RCA and done the safety patient

1 committee already involving the first incident.  
2 Q. Right.  
3 A. Based upon that being a similar allegation,  
4 we did not feel there was a need for an additional  
5 report or a similar action.  
6 Q. But wouldn't you want to know what happened  
7 in that case?  
8 A. Yes. But I mean in terms of the reporting  
9 itself, that's the reasoning why.  
10 Q. Well, wait a minute. The whole point of  
11 the reporting is to see if you can identify things  
12 that went wrong, or went right, whatever it was, and  
13 specifically wrong, so you don't do them again,  
14 right? That's basically the reason, correct?  
15 A. (Witness nods.)  
16 Q. Is that a yes?  
17 A. Yes.  
18 Q. Okay. So since this was a different  
19 situation, different time and different patient,  
20 wouldn't you want to know how that happened?  
21 A. Like I said before, I don't believe we did  
22 any individual state reporting on this. I don't  
23 remember if there was any additional RCAs or patient  
24 safety committees as a result of that.  
25 Q. What about Denise Hanna?

Page 56

1 A. I don't know.  
2 Q. Do you know who Denise Hanna is?  
3 A. No.  
4 Q. Do you know that Denise Hanna alleged that  
5 there was an assault of some type between her and  
6 Mr. Farmer?  
7 A. No.  
8 Q. How many women are you aware of who alleged  
9 that Mr. Farmer assaulted them in some way? I'm  
10 using that term "assault" loosely, but --  
11 MR. BEMIS: And you're specifying at  
12 Centennial Hills Hospital and not elsewhere, right?  
13 MR. MURDOCK: Yes.  
14 THE WITNESS: Two or three.  
15 BY MR. MURDOCK:  
16 Q. Two or three?  
17 A. Yeah.  
18 Q. I'm just trying to think in my mind here.  
19 See if I'm right, because I don't want to misstate  
20 your testimony.  
21 The COO, the chief operations  
22 officer of the hospital, who then in 2010 or 2011  
23 became the CEO of the hospital, and who is currently  
24 the CEO of the hospital -- as you sit here today you  
25 can't tell me specifically how many women at

Page 57

1 Centennial Hills Hospital, patients, alleged that  
2 Mr. Farmer sexually assaulted them in some way. Am I  
3 correct?

4 MR. BEMIS: I object to form.  
5 Argumentative. Go ahead and answer.

6 THE WITNESS: I believe it was three.

7 BY MR. MURDOCK:

8 Q. Can you give me their names?

9 A. No.

10 MR. MURDOCK: I don't have any further  
11 questions on this part, so I'll go around. Jim?

12 MR. SILVESTRI: I don't have any  
13 questions.

14 MS. BROOKHYSER: No questions.

15 MS. HALL: No questions.

16

17 (The deposition concluded at 2:53 p.m.)

18  
19  
20  
21  
22  
23  
24  
25

1 DEPOSITION ERRATA SHEET Page 59

2

3 File No. J0160273

4 Case Caption: Doe vs. Valley Health Systems, et al.

5

6

7

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I have

11 read the entire transcript of my deposition taken in

12 the captioned matter or the same has been read to me,

13 and the same is true and accurate, save and except

14 for changes and/or corrections, if any, as indicated

15 by me on the DEPOSITION ERRATA SHEET hereof, with the

16 understanding that I offer these changes as if still

17 under oath.

18

19 Signed this day of , 20 .

20

21

22

23 SAJIT PULLARKAT

24

25

Page 58

REPORTER'S CERTIFICATE

STATE OF NEVADA )  
 ) ss.  
COUNTY OF CLARK )

I, Carol O'Malley, Nevada Certified Court Reporter 178, do hereby certify:

That I reported the taking of the deposition of SAJIT PULLARKAT on August 7, 2015 commencing at the hour of 1:30 p.m.;

That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcription of said deposition is a complete, true, and accurate transcription of my said shorthand notes taken down at said time. Review of the transcript was requested.

I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor financially interested in said action.

IN WITNESS WHEREOF, I have hereunto set my hand in my office in the County of Clark, State of Nevada, this 17th day of August, 2015.

*Carol O'Malley*  
Carol O'Malley, CCR No. 178

| DEPOSITION ERRATA SHEET |                    |                     |
|-------------------------|--------------------|---------------------|
| 1                       |                    |                     |
| 2                       | Page No.           | Line No. Change to: |
| 3                       | Reason for change: |                     |
| 4                       | Page No.           | Line No. Change to: |
| 5                       | Reason for change: |                     |
| 6                       | Page No.           | Line No. Change to: |
| 7                       | Reason for change: |                     |
| 8                       | Page No.           | Line No. Change to: |
| 9                       | Reason for change: |                     |
| 10                      | Page No.           | Line No. Change to: |
| 11                      | Reason for change: |                     |
| 12                      | Page No.           | Line No. Change to: |
| 13                      | Reason for change: |                     |
| 14                      | Page No.           | Line No. Change to: |
| 15                      | Reason for change: |                     |
| 16                      | Page No.           | Line No. Change to: |
| 17                      | Reason for change: |                     |
| 18                      | Page No.           | Line No. Change to: |
| 19                      | Reason for change: |                     |
| 20                      | Page No.           | Line No. Change to: |
| 21                      | Reason for change: |                     |
| 22                      |                    |                     |
| 23                      |                    |                     |
| 24                      | SIGNATURE:         | DATE:               |
| SAJIT PULLARKAT         |                    |                     |
| 25                      |                    |                     |

DEPOSITION ERRATA SHEET

1  
2 Page No. Line No. Change to:  
3 Reason for change:  
4 Page No. Line No. Change to:  
5 Reason for change:  
6 Page No. Line No. Change to:  
7 Reason for change:  
8 Page No. Line No. Change to:  
9 Reason for change:  
10 Page No. Line No. Change to:  
11 Reason for change:  
12 Page No. Line No. Change to:  
13 Reason for change:  
14 Page No. Line No. Change to:  
15 Reason for change:  
16 Page No. Line No. Change to:  
17 Reason for change:  
18 Page No. Line No. Change to:  
19 Reason for change:  
20 Page No. Line No. Change to:  
21 Reason for change:  
22  
23  
24 SIGNATURE: DATE:  
SAJIT PULLARKAT  
25



TAB 72

SAJIT PULLARKAT PMK  
JANE DOE vs. VALLEY HEALTH

August 07, 2015  
1-4

Page 1

1 DISTRICT COURT  
2 CLARK COUNTY, NEVADA  
3 JANE DOE,  
4 Plaintiff,  
5 vs.  
6 CASE NO. 09-A-595780  
7 VALLEY HEALTH SYSTEM LLC,  
8 a Nevada limited  
9 liability company, d/b/a  
10 CENTENNIAL HILLS HOSPITAL  
11 MEDICAL CENTER; UNIVERSAL  
12 HEALTH SERVICES, INC., a  
13 Delaware corporation;  
14 AMERICAN NURSING  
15 SERVICES, INC., a  
16 Louisiana corporation;  
17 STEVEN DALE FARMER, an  
18 individual; DOES I  
19 through X, inclusive; and  
20 ROE CORPORATIONS I  
21 through X, inclusive,  
22 Defendants.  
23  
24  
25

DEPOSITION OF SAJIT PULLARKAT  
PMK OF CENTENNIAL HILLS HOSPITAL

Friday, August 7, 2015  
3:00 p.m.

521 S. Third Street  
Las Vegas, Nevada

Carol O'Malley, CCR 178, RMR

Page 2

1 APPEARANCES OF COUNSEL  
2 For Plaintiff:  
3 MURDOCK & ASSOCIATES, CHTD.  
4 ROBERT E. MURDOCK, ESQ.  
5 520 S. Fourth Street  
6 Second Floor  
7 Las Vegas, Nevada 89101  
8 702.384.5563  
9 702.384.4570 Fax  
10 lasvegasjustice@aol.com  
11  
12 For Defendant Valley Health System LLC, d/b/a  
13 Centennial Hills Hospital Medical Center:  
14 HALL PRANGLE & SCHOONVELD, LLC  
15 JOHN F. BEMIS, ESQ.  
16 Suite 200  
17 1160 N. Town Center Drive  
18 Las Vegas, Nevada 89144  
19 702.889.6400  
20 702.384.6025 Fax  
21 jlbemis@hpslaw.com  
22  
23 For Defendant American Nursing Services, Inc.:  
24 LEWIS BRISBOIS BISGAARD & SMITH LLP  
25 AMANDA J. BROOKHYSER, ESQ.  
6385 S. Rainbow Boulevard  
Suite 600  
Las Vegas, Nevada 89118  
702.693.4320  
702.893.3383  
702.893.3789 Fax  
amanda.brookhyser@lewisbrisbois.com  
PYATT & SILVESTRI  
JAMES P.C. SILVESTRI, ESQ.  
701 Bridger Avenue  
Las Vegas, Nevada 89101  
702.383.6000  
702.477.0088  
jsilvestri@psh-law.com

Page 3

1 APPEARANCES OF COUNSEL (Cont'd)  
2  
3 For Defendant Farmer:  
4 CARROLL, KELLY, TROTTER,  
5 FRANZEN, MCKENNA & PEABODY  
6 HEATHER S. HALL, ESQ.  
7 Suite 260  
8 8329 W. Sunset Road  
9 Las Vegas, Nevada 89113  
10 702.792.5755  
11 702.796.5855 Fax  
12 hshall@cktfmlaw.com  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 4

1 INDEX OF EXAMINATION  
2  
3 WITNESS: Sajit Pullarkat  
4  
5  
6  
7  
8  
9  
10 EXAMINATION PAGE  
11  
12 By Mr. Murdock 5  
13 By Mr. Silvestri 40  
14  
15  
16  
17  
18 INDEX TO EXHIBITS  
19  
20 EXHIBITS MARKED  
21  
22 None marked.  
23  
24  
25



800.211.DEPO (3376)  
EsquireSolutions.com

PA2897

Page 5

1 Deposition of Sajit Pullarkat  
2 August 7, 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 SAJIT PULLARKAT,  
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. Sajit Pullarkat.  
16 Q. Mr. Pullarkat, we just took your deposition  
17 personally. Now we're going to take your deposition  
18 because you're being presented as the person most  
19 knowledgeable regarding certain subjects.  
20 You're aware of that, correct?  
21 A. Yes.  
22 Q. So now you're talking not personally.  
23 You're talking as if I had Centennial Hills Hospital  
24 Medical Center sitting in that chair.  
25 Do you understand that?

Page 6

1 A. Yes.  
2 Q. There are nine areas that we're going to  
3 discuss here today. Okay?  
4 A. Okay.  
5 Q. Some of them overlap. I'm going to try  
6 very hard to stick to one area, and then go to the  
7 next. They may overlap in some ways, so I apologize  
8 in advance if you think I'm going back and forth.  
9 I'm not trying to do that for any other reason than  
10 it just flows that way. Okay?  
11 A. Sure.  
12 Q. And if you get confused on anything, just  
13 let me know.  
14 A. Okay.  
15 Q. The first area of inquiry is, "Dates, times  
16 and places worked by Steven Farmer at Centennial  
17 Hills Hospital Medical Center." Okay?  
18 A. (Witness nods.)  
19 Q. So let's talk about that.  
20 First of all, Steven Farmer worked  
21 at Centennial Hills Hospital Medical Center, correct?  
22 A. Correct.  
23 Q. I believe he began working there  
24 February 18, 2008. Am I correct?  
25 And I know you're looking at some

Page 7

1 documents there. If you would just do me a favor,  
2 and when you get to the document you are relying  
3 upon, if you would let me know -- there's a Bates  
4 stamp on that document generally. If you would let  
5 me know what number that document is, I think we  
6 would all be happy. Okay?  
7 A. Sure. Right now I'm looking at the -- I  
8 guess what is termed the accounting log, that we  
9 traditionally utilize for tracking agency. So I'm  
10 looking at -- I believe it's CHH-00372. Based off of  
11 that, it looks like February 18, 2008.  
12 Q. Could you tell me, did he always work the  
13 nightshift every time he worked there?  
14 A. I'd have to look at the records to confirm.  
15 It looks like they're all the nightshift.  
16 Q. Okay. I'm showing you a document on the  
17 screen right now. It is called STAFF-00001. Okay?  
18 Now, I have zoomed in -- I can zoom in a little bit  
19 more.  
20 What is this document? Do you  
21 know? Do you need it to come out a little bit,  
22 or can you see it?  
23 A. Let me see. It looks like the same thing  
24 as this one. It looks to be the same document that I  
25 was just referring to, which is the accounting log

Page 8

1 for agency -- that they use to track agency.  
2 Q. If you look at the screen again and look  
3 at -- I think it's 6/14/2008.  
4 MR. BEMIS: Objection.  
5 BY MR. MURDOCK:  
6 Q. I'm sorry. It looks like the first line  
7 that's got a box around Steven Farmer. It's hard to  
8 tell.  
9 MR. BEMIS: That copy looks bad. It's  
10 5/14.  
11 MR. MURDOCK: It's 5/14. All right.  
12 This is the best copy I've got, so --  
13 MR. SILVESTRI: What is the Bates  
14 stamp?  
15 MR. BEMIS: STAFF-0001.  
16 BY MR. MURDOCK:  
17 Q. It appears as though this document is some  
18 kind of billing document or accounting document  
19 regarding Steven Farmer's work at Centennial Hills  
20 Hospital, is that correct?  
21 A. My understanding is that these documents  
22 are from our accounting department, for tracking  
23 purposes.  
24 Q. Okay. And so it looks like on May 14, 2008  
25 Farmer did some time in the ER, and then some time on

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 9</p> <p>1 the sixth floor. Would that be correct?</p> <p>2 A. Yeah. It looks like he did spend time in</p> <p>3 two different units.</p> <p>4 Q. Okay. Do you know what each category is on</p> <p>5 this document?</p> <p>6 A. Yes.</p> <p>7 Q. Why don't we go across, and just stick with</p> <p>8 the first date. You say it's May 14, 2008?</p> <p>9 A. Right.</p> <p>10 Q. Okay. By the way, is the next date 6/15,</p> <p>11 or is there two for 6/14?</p> <p>12 A. There's two for 5/14.</p> <p>13 Q. Okay. So it's got the name "Steven</p> <p>14 Farmer."</p> <p>15 A. Correct.</p> <p>16 Q. So you've got the date, you've got the name</p> <p>17 "Steven Farmer." Then you've got something --</p> <p>18 A. Yeah, that's the position. So for "CN,"</p> <p>19 that means CNA.</p> <p>20 Q. Okay. Then there's a box that looks like</p> <p>21 it says "No?"</p> <p>22 A. That's "No." It's indicating whether the</p> <p>23 person is a traveler or an agency. So he was agency,</p> <p>24 so the answer is "No."</p> <p>25 Q. Okay. Then I don't know what it has. Is</p>                                                                                   | <p style="text-align: right;">Page 11</p> <p>1 already got the code for them?</p> <p>2 MR. BEMIS: On this document that was</p> <p>3 disclosed to you, that was written in by hospital</p> <p>4 staff provided to counsel to disclose, because the</p> <p>5 call centers are not self-explanatory.</p> <p>6 MR. MURDOCK: Oh, so we would know what</p> <p>7 it is.</p> <p>8 MR. BEMIS: Correct. So I was just</p> <p>9 trying to be nice to counsel.</p> <p>10 MR. MURDOCK: That was nice.</p> <p>11 MR. BEMIS: The call centers are not</p> <p>12 self-explanatory.</p> <p>13 MR. MURDOCK: I appreciate that. So</p> <p>14 that's good.</p> <p>15 BY MR. MURDOCK:</p> <p>16 Q. Then you go across and you've got something</p> <p>17 that says "21." Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. What is that for?</p> <p>20 A. That is the rate.</p> <p>21 Q. 21 bucks an hour?</p> <p>22 A. That's the payment rate.</p> <p>23 Q. So you were paying American Nursing</p> <p>24 Services \$21 an hour for Mr. Farmer's services, is</p> <p>25 that correct?</p>       |
| <p style="text-align: right;">Page 10</p> <p>1 that a box with the hours that he worked?</p> <p>2 A. The number 2 that you see in the three</p> <p>3 boxes there -- that indicates the shift. If it's a 1</p> <p>4 it's an a.m. shift, if it's a 2 it's a p.m. shift.</p> <p>5 Q. Oh, okay. So these boxes would indicate</p> <p>6 that he was working on the p.m. shift on May 14,</p> <p>7 2008, correct?</p> <p>8 A. Yes.</p> <p>9 Q. By the way, what's the shift time?</p> <p>10 A. Typically it's 7:00 to 7:00.</p> <p>11 Q. So that would be 7:00 p.m. to 7:00 a.m.,</p> <p>12 correct?</p> <p>13 A. Yes.</p> <p>14 Q. Then it's got I guess the location of where</p> <p>15 he was assigned to work, is that correct?</p> <p>16 A. Yeah. That four digit number is a call</p> <p>17 center, so it does designate which department he was</p> <p>18 assigned to or worked at.</p> <p>19 Q. And for the life of me I cannot read those</p> <p>20 numbers. Are they different?</p> <p>21 A. They are two different numbers, yes.</p> <p>22 Q. What's the difference?</p> <p>23 A. One is the ER, and one I believe is the</p> <p>24 sixth floor.</p> <p>25 Q. So why are they written in, if you've</p> | <p style="text-align: right;">Page 12</p> <p>1 A. That's correct.</p> <p>2 Q. The next box is what?</p> <p>3 A. The next box is "Hours worked."</p> <p>4 Q. And it appears as though -- is it two hours</p> <p>5 where he was working in the ER that day?</p> <p>6 A. Yes.</p> <p>7 Q. And then it looks like 9.5 hours where he's</p> <p>8 working on the sixth floor?</p> <p>9 A. That's correct.</p> <p>10 Q. And then there's an empty box. Do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. What is supposed to be in the empty box, if</p> <p>14 anything?</p> <p>15 A. I think that was if they did weekends.</p> <p>16 Q. And it says "No?"</p> <p>17 A. Yeah. That "No" is for the weekends.</p> <p>18 Q. And then there's another empty box?</p> <p>19 A. That's if they had overtime.</p> <p>20 Q. So he didn't have overtime.</p> <p>21 Then I assume it's got the agency</p> <p>22 name, and it's American Nursing Services, so it's got</p> <p>23 "American," right?</p> <p>24 A. Correct.</p> <p>25 Q. And there's another empty box. Do you see</p> |

Page 13

1 that?  
2 A. Yes.  
3 Q. And what's the empty box supposed to mean,  
4 if anything?  
5 A. It looks like it's an invoice number.  
6 Q. But there's nothing there?  
7 A. There's nothing there.  
8 Q. And then it looks like -- I don't know what  
9 that is. Some kind of numbers.  
10 Oh, that's the total amount  
11 billed, correct?  
12 A. Probably. I don't have that on mine.  
13 Q. Well, one is 42. So he worked two hours.  
14 21 times two is 42, right?  
15 A. Yes.  
16 Q. Okay. And so that number that's above the  
17 42 would be whatever 21 times 9.5 is. Would that be  
18 reasonable?  
19 A. Yes.  
20 Q. Is there another box there? It looks like  
21 it's cut off.  
22 A. I don't have one on my sheet showing that.  
23 Q. Well, do you see what I'm showing right  
24 here?  
25 A. Yeah.

Page 14

1 Q. Do you know what that is?  
2 A. No.  
3 Q. Okay. So on the evening shift on May 14,  
4 which would be May 14 and May 15, Mr. Farmer would  
5 have worked two hours in the ER, and then he would  
6 have been moved up to the sixth floor. Is that  
7 correct?  
8 A. Yes.  
9 Q. And he would have worked nine and a half  
10 hours, according to this document, on the sixth  
11 floor. Is that correct?  
12 A. Yes.  
13 Q. Back in 2008 did agency staff have the  
14 ability to enter things into the medical records, the  
15 computer chart?  
16 MR. BEMIS: I object.  
17 MR. SILVESTRI: Objection. Foundation.  
18 MR. MURDOCK: You're right. I'll fix  
19 that up. Let me just ask the question this way.  
20 BY MR. MURDOCK:  
21 Q. Do you know where on the sixth floor he  
22 worked on May 14, 2008?  
23 A. No.  
24 Q. Do you know if he was assigned to any  
25 specific rooms on May 14 -- the nightshift of May 14,

Page 15

1 2008?  
2 A. I do not.  
3 Q. Do you know what he was assigned to do on  
4 May 14, 2008?  
5 MR. BEMIS: Outside of being a CNA?  
6 MR. MURDOCK: Well, outside of  
7 anything. I don't know.  
8 BY MR. MURDOCK:  
9 Q. Do you know if he was assigned to do  
10 anything on May 14, 2008?  
11 MR. BEMIS: I object. That's outside  
12 the scope of his designation.  
13 THE WITNESS: I don't. I don't know  
14 what he was particularly assigned to do.  
15 BY MR. MURDOCK:  
16 Q. Do you know if he was particularly assigned  
17 to room 614?  
18 A. I don't know.  
19 Q. You don't know one way or the other?  
20 A. I don't.  
21 Q. Okay. Do you know if he worked room 614  
22 that night?  
23 MR. SILVESTRI: Objection. Lacks  
24 foundation.  
25 MR. BEMIS: I object to form. Go ahead

Page 16

1 and answer.  
2 THE WITNESS: I don't.  
3 BY MR. MURDOCK:  
4 Q. Do you know if he worked on the sixth floor  
5 that night?  
6 A. Based on the accounting record, yes.  
7 Q. Okay. So at the very least we know he was  
8 assigned to be on the sixth floor, and that's where  
9 he worked. Is that correct?  
10 A. Correct.  
11 Q. But outside of anything else more specific  
12 than that, you don't know?  
13 A. Correct.  
14 Q. Okay. Did Mr. Farmer ever work as a sitter  
15 at Centennial Hills Hospital?  
16 A. Let's see.  
17 Q. And what document are you looking at to  
18 find that out?  
19 A. CHH-00318, 19 and 20.  
20 Q. I'm sorry, what numbers?  
21 A. 318, 319 and 320.  
22 MR. BEMIS: The registry document, is  
23 that right?  
24 THE WITNESS: Yeah.  
25 So to answer your question, he was

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 17</p> <p>1 assigned to be a sitter -- let's see. What day is<br/>2 that? On the 25th.<br/>3 BY MR. MURDOCK:<br/>4 Q. Of what?<br/>5 A. It's April. That's the only day I see on<br/>6 the VHS registry pages.<br/>7 Q. Okay. Does this VHS registry go back to<br/>8 February 18, 2008?<br/>9 A. This is coming off of a daily scheduling<br/>10 system called One Staff. We don't have that system<br/>11 in place anymore. We migrated to a different<br/>12 scheduling system since that time.<br/>13 Q. Okay. I'm trying to find out, beginning<br/>14 February 18, 2008 through May 16, 2008, when<br/>15 Mr. Farmer was a sitter. And based on the documents<br/>16 that you're looking at, they only go back to<br/>17 4/13/2008.<br/>18 A. These are the only pages we were able to<br/>19 pull from the files.<br/>20 Q. So it's safe to say you can't tell me when<br/>21 he was a sitter, is that correct?<br/>22 A. The only one I can tell you is that one day<br/>23 I mentioned before, based upon the designation codes<br/>24 here.<br/>25 Q. That was April 25?</p>                                                      | <p style="text-align: right;">Page 19</p> <p>1 would be the 20th and 21st.<br/>2 THE WITNESS: 22nd and 24th and 27th<br/>3 would be the sixth.<br/>4 MR. BEMIS: Those are February.<br/>5 MR. MURDOCK: Okay. What about March?<br/>6 THE WITNESS: March 1st is the sixth,<br/>7 March 2nd is sixth, March 5th is seventh, March 6th<br/>8 is sixth, March 11th, 12th and 15th are sixth.<br/>9 BY MR. MURDOCK:<br/>10 Q. What about April?<br/>11 A. March 21st is sixth, March 25th is sixth,<br/>12 and March 29th is seventh. March 30th is seventh.<br/>13 April 3rd is sixth, April 4th is<br/>14 sixth, April 5th is sixth, April 6th is sixth. I'm<br/>15 not sure what that code is. And April 10th is sixth.<br/>16 Q. Anything else?<br/>17 A. Yes. Continuing on with April, April 25th<br/>18 is sixth, April 22nd is sixth.<br/>19 And then May 14th was that split<br/>20 shift that you displayed earlier. So part of it in<br/>21 the ER, part of it on the sixth floor.<br/>22 I believe that's it.<br/>23 Q. Are there any other split shifts that are<br/>24 denoted on these records? Specifically you're<br/>25 looking at CHH-372, et cetera.</p>              |
| <p style="text-align: right;">Page 18</p> <p>1 A. Yes.<br/>2 Q. Outside of looking at this VHS registry,<br/>3 have you looked at any other documents to find out<br/>4 when he worked as a sitter?<br/>5 A. This would have been the primary source to<br/>6 find that out. The only other document I've had was<br/>7 the accounting component, which doesn't specify that.<br/>8 Q. Well, yeah. But at least you would know if<br/>9 he worked in the ER, he was probably not a sitter.<br/>10 Would that be correct?<br/>11 A. That would be correct.<br/>12 Q. So looking back on whatever registry you<br/>13 want to look at that you've got in front of you, can<br/>14 you tell me, based on that, when he was assigned to<br/>15 any other floors?<br/>16 A. He was assigned to the sixth floor on<br/>17 February 18th and 19th.<br/>18 MR. SILVESTRI: Tell us what you're<br/>19 reading from.<br/>20 THE WITNESS: I'm sorry. It's<br/>21 CHH-000372.<br/>22 MR. MURDOCK: Why don't you just tell<br/>23 me. I don't want to keep going back and forth.<br/>24 MR. BEMIS: The 18th and 19th are the<br/>25 seventh floor. 207 is seventh. 810 is the ER, which</p> | <p style="text-align: right;">Page 20</p> <p>1 A. There's one split shift on 369 between the<br/>2 sixth floor and the ER. And that's it.<br/>3 Q. What date was that, the one on 369?<br/>4 A. That was the 3rd of April.<br/>5 Q. How long did he work on the sixth floor<br/>6 that day, on April 3, 2008?<br/>7 A. Three hours.<br/>8 Q. How long did he work in the ER that day?<br/>9 A. Nine.<br/>10 Q. From the documents you have in front of<br/>11 you, are you able to tell which was first, the ER or<br/>12 the sixth floor that day?<br/>13 A. I'm not sure which one would be first.<br/>14 Q. Are you able to tell me, aside from the<br/>15 places that he was assigned, the sixth floor or the<br/>16 ER or the seventh floor, exactly what his tasks<br/>17 assigned were on those dates?<br/>18 MR. BEMIS: I object to form. Outside<br/>19 of the scope of this witness' designation.<br/>20 MR. MURDOCK: Let me restate that.<br/>21 BY MR. MURDOCK:<br/>22 Q. Are you able to tell me specifically what<br/>23 rooms he worked at on those dates?<br/>24 A. No, I wouldn't be able to tell you that.<br/>25 Q. Okay. Let's move on to the "Investigation</p> |

Page 21

1 of Farmer by Centennial Hills before and during work  
2 at Centennial Hills." We sort of started to get into  
3 that in the last deposition, so let me kind of  
4 backtrack a little bit.  
5 Farmer came on, and certain  
6 documents are required before an agency staff is  
7 allowed to work in the hospital. Is that correct?  
8 A. That is correct.  
9 Q. And those documents, for example, are the  
10 assigned job description. That's one of those  
11 documents that's required, right?  
12 A. Yes.  
13 Q. A skills competency checklist. That's  
14 required, right?  
15 A. Correct.  
16 Q. All the various certifications. That's  
17 required. You've got to have those before you're  
18 allowed to work at the hospital, right?  
19 A. Yes.  
20 Q. An application is required, right?  
21 A. Yes.  
22 Q. References are required, right?  
23 A. Yes.  
24 Q. And the references that are required -- at  
25 least one needs to be from the last job worked at,

Page 22

1 right?  
2 A. Typically.  
3 Q. Well, yeah. If you didn't work at all, I  
4 assume you don't have a reference, right?  
5 A. Right.  
6 Q. But if you worked, it would be from the  
7 last job you worked at, right?  
8 A. Right.  
9 Q. Okay. And it was required that Centennial  
10 Hills Hospital have those references, including the  
11 last job worked, before he was allowed to work at the  
12 hospital, right?  
13 A. Yes.  
14 Q. Do you know who Crystal Johnson is?  
15 A. No.  
16 Q. Have you ever read her deposition in this  
17 case?  
18 A. No.  
19 Q. I'm sorry?  
20 A. No.  
21 Q. Crystal Johnson testified that she was the  
22 staffing person for Mr. Farmer's file, and Crystal  
23 Johnson testified that she never got the references.  
24 Are you aware of that?  
25 A. After reviewing the documentation, I can

Page 23

1 definitely see that the references are not in the  
2 file.  
3 Q. Okay.  
4 A. I mean it is circled on here, "Need,"  
5 although it's signed off. Usually the sign off is to  
6 indicate it's completed, but it does say "Need" on  
7 here. But after a review of the file, we were not  
8 able to find the references.  
9 Q. So would you agree with me that if there  
10 were no references in the file, if the references  
11 were not provided to you by ANS or by Mr. Farmer, he  
12 should not have been working at the hospital? Is  
13 that correct?  
14 A. There are requirements certainly, but  
15 references don't typically detail out a person's  
16 ability to do the job.  
17 Q. That's not what I asked you.  
18 There's certain requirements to  
19 work at Centennial Hills Hospital, right?  
20 A. Correct.  
21 Q. You have them, right?  
22 A. Yes.  
23 Q. Nurses have them, correct?  
24 A. Yes.  
25 Q. Janitors have them, right?

Page 24

1 A. Yes.  
2 Q. And one of those things is these  
3 references, right?  
4 A. Yes.  
5 Q. Without them that individual is not allowed  
6 to work in the hospital, correct?  
7 A. Correct.  
8 Q. Okay. So why was Mr. Farmer working at  
9 Centennial Hills Hospital on May 14, 2008?  
10 A. I don't know. I mean honestly going back  
11 and looking at the application, it certainly shows  
12 the references were not completed; but again, I don't  
13 have an answer for that.  
14 Q. Okay. One of the ways people who work at  
15 Centennial Hills Hospital are investigated by the  
16 hospital is by looking at those references, right?  
17 A. Yes.  
18 Q. So if Centennial Hills Hospital did not  
19 have those references that were required of  
20 Mr. Farmer, wouldn't you agree with me that  
21 Centennial Hills Hospital did not properly  
22 investigate Mr. Farmer before allowing him to work at  
23 the hospital?  
24 MR. BEMIS: I object to form. Calls  
25 for a legal conclusion. Incomplete hypothetical.

Page 25

1 BY MR. MURDOCK:  
2 Q. You can answer the question.  
3 A. In a complete check the references should  
4 have been in place.  
5 Q. Let's just answer my question. We know  
6 they should have been there, okay?  
7 My question was very specific  
8 though, because my question was talking about the  
9 references are part of your investigation of  
10 Mr. Farmer before allowing him to be at the hospital,  
11 right?  
12 A. Correct.  
13 Q. But if the hospital didn't require those  
14 references, didn't have those references of  
15 Mr. Farmer, but still allowed him to work at the  
16 hospital, wouldn't you agree with me that the  
17 hospital did not properly investigate Mr. Farmer  
18 before allowing him to work at the hospital?  
19 MR. BEMIS: Same objections.  
20 BY MR. MURDOCK:  
21 Q. You can go ahead.  
22 A. We didn't get the references, so it's not a  
23 complete file.  
24 Q. That's not what I asked you.  
25 MR. MURDOCK: Would you please repeat

Page 26

1 the question, Carol?  
2 (The following question was read:)  
3 "But if the hospital didn't require those  
4 references, didn't have those references of  
5 Mr. Farmer, but still allowed him to work at the  
6 hospital, wouldn't you agree with me that the  
7 hospital did not properly investigate Mr. Farmer  
8 before allowing him to work at the hospital?"  
9 MR. BEMIS: Same objection.  
10 THE WITNESS: Yes.  
11 BY MR. MURDOCK:  
12 Q. Thank you.  
13 The next subject is the VHS  
14 registry of Steven Farmer. We already talked about  
15 that, right?  
16 MR. BEMIS: We did.  
17 BY MR. MURDOCK:  
18 Q. The VHS, just so I'm aware, that's CHH0-318  
19 through -- it looks like 321. That's those documents  
20 you said from One Staff?  
21 A. Yes.  
22 Q. And these are the only ones you could pull  
23 off, right?  
24 A. Correct.  
25 Q. Because you don't use it anymore?

Page 27

1 A. Correct.  
2 Q. Did you go back and check again, in  
3 preparation for this deposition, whether or not you  
4 could actually pull off more?  
5 A. Yes. I know our staffing coordinator tried  
6 to pull it up, but it's no longer on the server  
7 anymore, so --  
8 Q. Okay. Let's go on to the next one then.  
9 Kronos Log. What is Kronos?  
10 A. It's our timekeeping system.  
11 Q. Is there a Kronos Log for Mr. Farmer?  
12 A. That I don't know. The only files I have  
13 are the registry and the accounting component.  
14 Q. Did you do anything to find out if there  
15 was a Kronos Log?  
16 A. I was looking into it, but I never got a  
17 complete answer on that.  
18 MR. BEMIS: Can we take a break for a  
19 second?  
20 MR. MURDOCK: Yeah, why don't you take  
21 a break.  
22 (Recess.)  
23 BY MR. MURDOCK:  
24 Q. We already talked about the agency payroll  
25 spreadsheet, is that correct?

Page 28

1 A. That's correct.  
2 Q. That's 366 to 372?  
3 A. Yes.  
4 Q. Okay. Does that have on there where  
5 Mr. Farmer was working?  
6 A. By department.  
7 Q. And that's what we talked about before.  
8 That's how we figured out that on May 14, 2008, from  
9 the 7:00 p.m. to 7:00 a.m. shift he was working two  
10 hours in the ER, and then nine and a half hours on  
11 the sixth floor. Is that correct?  
12 A. That's correct.  
13 Q. Okay. Let's move on to paragraph 23 of the  
14 Notice. It's the 2012 deficiencies. I'm not going  
15 to get into all the deficiencies. That wasn't the  
16 point of that.  
17 Nevertheless, there were  
18 deficiencies found by the state, is that correct?  
19 A. That's correct.  
20 Q. And one of those deficiencies that was  
21 found is that there was no policy in place at  
22 Centennial Hills Hospital regarding staff-on-patient  
23 abuse, is that correct?  
24 A. There was modifications that needed to be  
25 made to the policy. The specific incident that



Page 29

1 started the state investigation was an account of  
2 verbal abuse. So as a result of the investigation  
3 they made changes to accommodate an additional abuse  
4 policy and modifications to our grievance policy.  
5 Q. Okay. But was there a specific policy back  
6 in 2008 on staff/patient abuse? In other words, what  
7 to do if you witnessed it, who to notify, things like  
8 that?  
9 MR. BEMIS: I object that it's outside  
10 his designation. But go ahead and answer.  
11 MR. MURDOCK: Well, it goes along with  
12 this. That's all.  
13 THE WITNESS: I'm not sure.  
14 BY MR. MURDOCK:  
15 Q. And the reason I ask -- and I'm not trying  
16 to be a smart guy -- the deficiencies state that  
17 there was no policy regarding staff-on-patient abuse.  
18 I recognize that that's from a verbal abuse issue.  
19 But nevertheless, my understanding  
20 is that the state interviewed -- I don't know, a  
21 bunch of employees -- they went through it, and the  
22 problem was nobody really knew what to do. I guess  
23 some people did, some people didn't, and that's why  
24 the state wanted an actual -- kind of like a  
25 notification tree as to what to do. Is that correct?

Page 30

1 A. That's correct.  
2 Q. So would I be safe to say that back in 2008  
3 there was no policy on staff/patient abuse in terms  
4 of those things, in terms of notifications, things  
5 like that?  
6 A. In terms of the policy we added, obviously  
7 that wouldn't have been in place at that time, in  
8 2008.  
9 Q. There is a policy now though, right?  
10 A. Correct.  
11 Q. So now if I'm a staff member and I see some  
12 sort of staff-on-patient abuse, I can go look at the  
13 policies and procedures and they tell me exactly who  
14 to notify, what to do, and things like that. Right?  
15 A. That's correct.  
16 Q. Okay. But back in 2008 there was no such  
17 policy, correct?  
18 A. It wasn't specified, yes.  
19 Q. For example, if a nurse became concerned  
20 that a person working at Centennial Hills Hospital  
21 was very overly attentive of female patients, and  
22 very anxious to connect them to the monitors and  
23 disconnect them from the monitors, which would  
24 require reaching into their clothing, there was no  
25 policy in place at Centennial Hills Hospital that

Page 31

1 would direct that person as to who to inform and what  
2 to do about it. Is that correct?  
3 MR. BEMIS: I object to form.  
4 Incomplete hypothetical. Go ahead and answer.  
5 THE WITNESS: Policy detail -- we do  
6 have a policy regarding chain of command, whenever  
7 there are issues or concerns, regardless of what it  
8 happens to be. And those are certainly in place.  
9 BY MR. MURDOCK:  
10 Q. Absolutely. But I'm just talking  
11 specifically about this sort of thing, which is  
12 staff-on-patient abuse. Right?  
13 MR. BEMIS: I object to form.  
14 BY MR. MURDOCK:  
15 Q. I mean you'd agree that's what I basically  
16 just read, right?  
17 MR. BEMIS: I object to form.  
18 THE WITNESS: (Witness nods.)  
19 BY MR. MURDOCK:  
20 Q. You have to answer verbally.  
21 A. Yes.  
22 Q. So what I'm getting at is, back in 2008 if  
23 this nurse found out that another nurse was concerned  
24 because someone working at Centennial Hills Hospital  
25 was very overly attentive with female patients, and

Page 32

1 very anxious to connect them to the monitors and  
2 disconnect them from the monitors, which required  
3 them to reach into their clothing, there was no  
4 policy specifically set forth and notification tree  
5 as to what that nurse was supposed to do about it in  
6 terms of policies and procedures, specifically  
7 relating to staff-on-patient abuse at Centennial  
8 Hills Hospital in 2008. Is that correct?  
9 MR. BEMIS: I object to form.  
10 THE WITNESS: That policy did not exist  
11 at that time, yes.  
12 BY MR. MURDOCK:  
13 Q. So I'm correct, right?  
14 A. Yes.  
15 Q. Thank you.  
16 If a nurse observed a male sitter  
17 in a female patient's room with the lights out and  
18 the door closed, and that same nurse hears yelling  
19 coming from that room -- yelling such as, "I don't  
20 want you by me, get out of here" -- there was no  
21 policy in place at Centennial Hills Hospital back in  
22 2008 to tell that nurse specifically what to do about  
23 that situation. Is that correct?  
24 MR. BEMIS: Form. Foundation.  
25 Incomplete hypothetical.

Page 33

1 MS. HALL: Join. Incomplete  
2 hypothetical.  
3 THE WITNESS: I'm sorry, repeat the  
4 question?  
5 MR. MURDOCK: Are you kidding me?  
6 MS. HALL: Do you want it read back?  
7 MR. MURDOCK: No.  
8 BY MR. MURDOCK:  
9 Q. I want you to listen to the following  
10 hypothetical.  
11 The nurse on the floor, sixth or  
12 seventh floor probably -- let's just say sixth or  
13 seventh floor back in 2008. There's a sitter in one  
14 of the patient rooms, okay? It's a male sitter with  
15 a female patient.  
16 The nurse observes that the lights  
17 are out in the room, the door is closed, and then  
18 coming from that room she hears yelling, "I don't  
19 want you by me. Get out of here."  
20 Was there a policy in place at  
21 Centennial Hills Hospital back in 2008 that would  
22 direct her as to what to do about that situation?  
23 MR. BEMIS: Form. Foundation.  
24 Incomplete hypothetical. Outside the scope of his  
25 designation.

Page 34

1 MS. HALL: Join.  
2 MR. BEMIS: Please answer.  
3 THE WITNESS: To me that would be  
4 dictated by chain of command policies.  
5 BY MR. MURDOCK:  
6 Q. Okay.  
7 A. You don't need to have a specific abuse  
8 policy to know when there's inappropriate conditions  
9 occurring.  
10 Q. But the state came in in 2012 and mandated  
11 you to have a policy, despite the fact you've got  
12 these chain of command policies. So the State of  
13 Nevada seemed to think you ought to have one, right?  
14 A. Agreed.  
15 Q. And you changed the policies in order to  
16 have one, right?  
17 A. Yes.  
18 Q. So going backwards, back to 2008 when you  
19 didn't have one, there was no policy for this nurse  
20 that we just talked about, to go look at and tell her  
21 what to do about this sort of staff-on-patient abuse,  
22 or possible staff-on-patient abuse. Is that correct?  
23 MR. BEMIS: Asked and answered.  
24 THE WITNESS: No specific abuse policy.  
25 BY MR. MURDOCK:

Page 35

1 Q. Okay. Let me see if you can answer my  
2 question now.  
3 MR. BEMIS: I think he's answered the  
4 question. It's just not the answer you want.  
5 MR. MURDOCK: Well, no, I mean it's a  
6 fine answer. He's right. There is no policy on  
7 abuse. We agree with that, okay?  
8 BY MR. MURDOCK:  
9 Q. But I asked you a pretty direct question.  
10 There was no policy in place for  
11 this nurse to look to, to tell her exactly what to  
12 do, correct?  
13 MR. BEMIS: Other than the chain of  
14 command policy.  
15 MR. MURDOCK: Other than what he's  
16 already talked about, the chain of command policy,  
17 which we've already talked about.  
18 BY MR. MURDOCK:  
19 Q. Other than that, was there any other policy  
20 specifically about staff-on-patient abuse? "Yes" or  
21 "no."  
22 MR. BEMIS: Objection. It's  
23 outside the scope of his designation. Go ahead and  
24 answer.  
25 THE WITNESS: No.

Page 36

1 BY MR. MURDOCK:  
2 Q. No. Okay.  
3 We sort of talked about the next  
4 one in your personal deposition, and so I think we'll  
5 probably be pretty quick here in the 30(b)6  
6 deposition, about investigation by Centennial Hills  
7 Hospital Medical Center of other patients who may  
8 have been sexually assaulted by Steven Farmer.  
9 Is it safe to say that there has  
10 been absolutely no investigation by Centennial Hills  
11 Medical Center of any other patients who may have  
12 been sexually assaulted by Mr. Farmer? I'm not  
13 talking about lawyers. I'm talking about by the  
14 hospital itself.  
15 A. Legal counsel was initially consulted on  
16 the initial case, and they proceeded with the  
17 investigation.  
18 Q. Has there ever been an investigation by the  
19 hospital -- not legal counsel for the hospital, but  
20 by the hospital, of the allegations of Marsha  
21 Petersen?  
22 A. The investigation, like I said, was led by  
23 legal counsel. So no.  
24 MR. MURDOCK: I don't think I have  
25 anything further at this time.

Page 37

1 MR. BEMIS: Can I clean up one thing  
2 about the Kronos question that you asked previously?  
3 MR. MURDOCK: Oh, yeah.  
4 MR. BEMIS: Just ask him whether Kronos  
5 applies to Centennial Hills staff or --  
6 MR. MURDOCK: I'll ask him. Let me  
7 just go back for a second.  
8 BY MR. MURDOCK:  
9 Q. First of all, let's go backwards in time  
10 for a second. What is Kronos?  
11 A. Kronos is our payroll management system.  
12 MR. SILVESTRI: It's what?  
13 THE WITNESS: It's our payroll  
14 management system. So it's basically how our staff  
15 badge in and badge out.  
16 BY MR. MURDOCK:  
17 Q. Okay. That's what I thought it was, and  
18 you just changed it on me with that payroll thing.  
19 A. It encompasses that component, so --  
20 Q. Okay. Did Kronos apply to agency staff  
21 members?  
22 A. It did not. It was only for in-house  
23 employees.  
24 Q. So in other words, these agency staff  
25 personnel didn't get a badge from Kronos, right?

Page 38

1 A. That's correct.  
2 Q. Was Kronos even in use in 2008?  
3 A. Yes.  
4 Q. Where did Mr. Farmer get his badge, if he  
5 didn't get it through Kronos?  
6 A. He wouldn't get a badge with Kronos access.  
7 He would get a hospital badge without that component  
8 on it.  
9 Q. And if you didn't have Kronos access, would  
10 you be able to access anywhere in the hospital, or  
11 were you limited in certain circumstances?  
12 A. Depending upon where the employee worked,  
13 from a skill level and otherwise, they would be  
14 granted access.  
15 Q. So for example, Mr. Farmer was a CNA.  
16 Where did his badge allow him to go?  
17 A. Well, based upon the detail, it was  
18 obviously the ER, sixth floor, seventh floor areas.  
19 Q. Let me ask you this, because maybe I can  
20 now understand this.  
21 That badge that Mr. Farmer had --  
22 does that open the door to certain areas? For  
23 example, the ER. Does it open the ER, to get back  
24 there?  
25 A. Today it would. I honestly don't remember

Page 39

1 back in 2008 if the doors were card accessed.  
2 Q. So when you say it allowed him to go back  
3 there, maybe you can explain that to me. Because I'm  
4 a little confused.  
5 A. Today as people get hospital badges, based  
6 upon the area they work, they get granted access.  
7 Q. Right.  
8 A. Today the various areas of the hospital  
9 have badge access to them. So the card would be  
10 built in with that access, based upon where the  
11 individual practiced or worked.  
12 So if they were in the ER, they  
13 would have access to the ER, because those doors are  
14 badge accessed.  
15 Q. How did those doors work back in 2008  
16 though?  
17 A. That's what I don't know -- if those doors  
18 were badge accessed at that time. I would have to go  
19 back and check.  
20 Q. In other words, was Farmer allowed anywhere  
21 in the hospital with his badge?  
22 A. Like I said, I don't know. I don't know  
23 all the areas that were under control at that time,  
24 in terms of access control. So I couldn't clearly  
25 give you an answer on that.

Page 40

1 Q. Okay.  
2 MR. MURDOCK: Jim?  
3 MR. SILVESTRI: I do have some  
4 questions.  
5  
6 EXAMINATION  
7 BY MR. SILVESTRI:  
8 Q. It's my understanding that you're  
9 identified as what we call the Rule 30(b)6 witness  
10 for Centennial Hills Hospital for category number 11,  
11 which is the use of Steven Farmer as a sitter.  
12 MR. BEMIS: No, he's not.  
13 MR. MURDOCK: He's not, no.  
14 MR. SILVESTRI: Who is? That's coming  
15 up?  
16 MR. BEMIS: Yeah. Not today.  
17 MR. MURDOCK: Jim, let me tell you,  
18 just so you know, the square ones are his. I should  
19 have given you a copy of that.  
20 MR. SILVESTRI: Okay.  
21 BY MR. SILVESTRI:  
22 Q. So just so I'm clear, you are not the  
23 witness for number 26, which is, "All tasks assigned  
24 to Steven Farmer by Centennial Hills from May 14,  
25 2008 to May 16, 2008?"

Page 41

1 MR. SILVESTRI: Is that a correct  
2 statement? He is not that person?  
3 MR. BEMIS: Yes.  
4 BY MR. SILVESTRI:  
5 Q. Just so I understand Kronos, did Kronos  
6 allow nurses to input their findings regarding an  
7 individual patient?  
8 A. Kronos?  
9 Q. Yeah.  
10 A. No. Kronos is just payroll.  
11 Q. It's solely personnel issues, not  
12 patient-related?  
13 A. Yeah. It's not for inputting data. It's  
14 really collecting the hours worked.  
15 MR. SILVESTRI: I don't have any other  
16 questions. Thank you.  
17 MR. MURDOCK: That's it.  
18  
19 (The deposition concluded at 4:03 p.m.)  
20  
21  
22  
23  
24  
25

Page 42

1 REPORTER'S CERTIFICATE  
2 STATE OF NEVADA )  
3 ) ss.  
4 COUNTY OF CLARK )  
5 I, Carol O'Malley, Nevada Certified Court  
6 Reporter 178, do hereby certify:  
7 That I reported the taking of the deposition  
8 of SAJIT PULLARKAT on August 7, 2015 commencing at  
9 the hour of 3:00 p.m.;  
10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole  
12 truth, and nothing but the truth;  
13 That I thereafter transcribed my said  
14 shorthand notes into typewriting and that the  
15 typewritten transcription of said deposition is a  
16 complete, true, and accurate transcription of my said  
17 shorthand notes taken down at said time. Review of  
18 the transcript was requested.  
19 I further certify that I am not a relative or  
20 employee of an attorney or counsel involved in said  
21 action, nor financially interested in said action.  
22 IN WITNESS WHEREOF, I have hereunto set my hand  
23 in my office in the County of Clark, State of Nevada,  
24 this 8th day of August, 2015.  
25 *Carol O'Malley*  
Carol O'Malley, CCR No. 178

Page 43

1 DEPOSITION ERRATA SHEET  
2  
3 File No. J0160273  
4 Case Caption: Doe vs. Valley Health System, et al.  
5  
6  
7  
8 DECLARATION UNDER PENALTY OF PERJURY  
9  
10 I declare under penalty of perjury that I have  
11 read the entire transcript of my deposition taken in  
12 the captioned matter or the same has been read to me,  
13 and the same is true and accurate, save and except  
14 for changes and/or corrections, if any, as indicated  
15 by me on the DEPOSITION ERRATA SHEET hereof, with the  
16 understanding that I offer these changes as if still  
17 under oath.  
18  
19 Signed this day of , 20  
20  
21  
22 SAJIT PULLARKAT  
23  
24  
25

Page 44

1 DEPOSITION ERRATA SHEET  
2 Page No. Line No. Change to:  
3 Reason for change:  
4 Page No. Line No. Change to:  
5 Reason for change:  
6 Page No. Line No. Change to:  
7 Reason for change:  
8 Page No. Line No. Change to:  
9 Reason for change:  
10 Page No. Line No. Change to:  
11 Reason for change:  
12 Page No. Line No. Change to:  
13 Reason for change:  
14 Page No. Line No. Change to:  
15 Reason for change:  
16 Page No. Line No. Change to:  
17 Reason for change:  
18 Page No. Line No. Change to:  
19 Reason for change:  
20 Page No. Line No. Change to:  
21 Reason for change:  
22  
23  
24 SIGNATURE: DATE:  
25 SAJIT PULLARKAT

DEPOSITION ERRATA SHEET

1  
2 Page No. Line No. Change to:  
3 Reason for change:  
4 Page No. Line No. Change to:  
5 Reason for change:  
6 Page No. Line No. Change to:  
7 Reason for change:  
8 Page No. Line No. Change to:  
9 Reason for change:  
10 Page No. Line No. Change to:  
11 Reason for change:  
12 Page No. Line No. Change to:  
13 Reason for change:  
14 Page No. Line No. Change to:  
15 Reason for change:  
16 Page No. Line No. Change to:  
17 Reason for change:  
18 Page No. Line No. Change to:  
19 Reason for change:  
20 Page No. Line No. Change to:  
21 Reason for change:

22

23

24 SIGNATURE:

DATE:

SAJIT PULLARKAT

25

TAB 73

1 DISTRICT COURT  
2 CLARK COUNTY, NEVADA

3 JANE DOE,

4 Plaintiff,

5 vs.

CASE NO. 09-A-595780

6 VALLEY HEALTH SYSTEM LLC,  
a Nevada limited  
7 liability company, d/b/a  
CENTENNIAL HILLS HOSPITAL  
8 MEDICAL CENTER; UNIVERSAL  
HEALTH SERVICES, INC., a  
9 Delaware corporation;  
AMERICAN NURSING  
10 SERVICES, INC., a  
Louisiana corporation;  
11 STEVEN DALE FARMER, an  
individual; DOES I  
12 through X, inclusive; and  
ROE CORPORATIONS I  
13 through X, inclusive,

14 Defendants.

~~~~~

15

16

17 DEPOSITION OF JANET CALLIHAM

18

19 Tuesday, August 18, 2015

20 1:30 p.m.

21



22 521 S. Third Street

23 Las Vegas, Nevada

24

25 Carol O'Malley, CCR 178, RMR

♀

2

1 APPEARANCES OF COUNSEL

2

3 For Plaintiff:

4 MURDOCK & ASSOCIATES, CHTD.

ROBERT E. MURDOCK, ESQ.

5 520 S. Fourth Street

Second Floor

6 Las Vegas, Nevada 89101

702.384.5563

7 702.384.4570 Fax

lasvegasjustice@aol.com

8

9 For Defendant Valley Health System LLC, d/b/a  
Centennial Hills Hospital Medical Center:

10

HALL PRANGLE & SCHOONVELD, LLC

11 MICHAEL E. PRANGLE, ESQ.

Suite 3300

12 200 South Wacker Drive

Chicago, Illinois 60606

13 312.267.6202

312.345.9608 Fax

14 mprangle@hpslaw.com

15

For Defendant American Nursing Services, Inc.:

16

LEWIS BRISBOIS BISGAARD & SMITH LLP

17 S. BRENT VOGEL, ESQ.



J0173225 CALLIHAM JANET 081815.txt  
6385 S. Rainbow Boulevard  
18 Suite 600  
Las Vegas, Nevada 89118  
19 702.693.4320  
702.893.3383  
20 702.893.3789 Fax  
svogel@lewisbrisbois.com  
21  
22 PYATT & SILVESTRI  
RYAN W. BIGGAR, ESQ.  
23 701 Bridger Avenue  
Las Vegas, Nevada 89101  
24 702.383.6000  
702.477.0088  
25 rbiggar@pyattsilvestri.com

♀

3

1 APPEARANCES OF COUNSEL (Cont'd)  
2  
3 For Defendant Farmer:  
4 CARROLL, KELLY, TROTTER,  
FRANZEN, McKENNA & PEABODY  
HEATHER S. HALL, ESQ.  
5 Suite 260  
8329 W. Sunset Road  
6 Las Vegas, Nevada 89113  
702.792.5755  
7 702.796.5855 Fax  
hshall@cktfmlaw.com  
8 (appearing telephonically)  
9  
10  
11  
12  
13

14

15

16

17

18

19

20

21

22

23

24

25

♀

4

1

INDEX OF EXAMINATION

2

3

WITNESS: Janet Calliham

4

5

6

7

8

9

10 EXAMINATION PAGE

11

12 By Mr. Murdock 5

13

14

15

16

17

18 INDEX TO EXHIBITS

19 EXHIBITS MARKED

20

21 1 Universal Health Services Risk  
22 Management Worksheet 23

23

24

25

26

5

1 Deposition of Janet Calliham

2 August 18, 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

Page 5

6 Rule 30(b)(4) of NRCp.)

7

8 JANET CALLIHAM,

9 having been first duly sworn, testified as follows:

10

11 EXAMINATION

12 BY MR. MURDOCK:

13 Q. Would you state your name for the record?

14 A. Janet Calliham.

15 Q. Janet, how do you spell your last name?

16 A. C-a-l-l-i-h-a-m.

17 Q. So you're Janet Calliham?

18 A. (Witness nods.)

19 Q. Is that a yes?

20 A. Yes.

21 Q. Have you ever had your deposition taken

22 before?

23 A. In my career, you mean?

24 Q. Yes.

25 A. Yes.

♀

6

1 Q. How many times?

2 A. A couple.

3 Q. When was the last time you had your  
4 deposition taken?

5 A. I don't remember.

6 Q. You know you have a duty to tell the truth?

7 A. Yes.

8 Q. You know the law of perjury applies here as  
9 it does in a court of law?

10 A. Yes, it does.

11 Q. My understanding is that you are retired?

12 A. Yes.

13 Q. When did you retire?

14 A. This time I retired in April.

15 Q. That tells me you retired before, and then  
16 you unretired?

17 A. Yes.

18 Q. So you retired in April of 2015?

19 A. Uh-huh.

20 Q. Is that a yes?

21 A. Yes.

22 Q. And before then where did you work, right  
23 before then?

24 A. Right before then I retired from a hospital  
25 called Progressive Hospital.

1 Q. Where is that?

2 A. It was on Flamingo and McLeod.

3 Q. What kind of place is that?

4 A. It's a long-term acute care. It's been

5 sold and does not exist anymore.

6 Q. Okay.

7 A. It was sold at the end of April.

8 Q. Who owned it?

9 A. It was a stand-alone facility. It was not

10 a corporate entity.

11 Q. Okay. And before you worked there where

12 did you work?

13 A. I worked for Kindred Healthcare.

14 Q. Where at?

15 A. Part of it was at the Vegas facilities. I

16 was the area director for quality over the three

17 Vegas hospitals.

18 Then I went back to work for the

19 region office and did a little traveling around to

20 the hospitals in Southern California.

21 Q. Kindred?

22 A. Yes.

23 Q. How long were you at Kindred?

24 A. This time it was probably about three

25 years.

8

1 Q. Which tells me you worked there before?

2 A. Yes.

3 Q. I want to stay with this for a little bit.

4 So you worked there for three

5 years. Where did you work before Kindred?

6 A. Actually that was my first retirement.

7 Q. And that would have been around 2012 or so,

8 2011?

9 A. Yes. I was retired for about seven or  
10 eight months of '12.

11 Q. Where did you work prior to retiring in  
12 2012, the immediate job?

13 A. Prior to?

14 Q. Yeah.

15 A. I was working at Kindred.

16 Q. Oh, okay. So you were working at Kindred,  
17 then you retired, and then you went back to Kindred?

18           A.   No.  I worked at Kindred, retired, worked  
19   at Progressive, re-retired.

20           Q.   Right.  What I'm saying is, before you  
21   retired in 2012, where did you work before then?

22           A.   I was working at Kindred from 2008 to 2012.  
23   Actually it would be 2011 technically.  It would be  
24   December of '11.

25           Q.   And my understanding is that you worked

9

1   there, and I think sometime in the summer of 2008 you  
2   moved to Kindred?

3           A.   It was fall, I think.  Early fall maybe of  
4   '08 that I went back to Kindred.

5                   MR. VOGEL:  Rob, can we go off the  
6   record?

7                   (Discussion off the record.)

8           (Ms. Hall joined the deposition telephonically.)

9   BY MR. MURDOCK:

10          Q.   So sometime in the late summer or early  
11   fall of 2008 you went to work for Kindred, correct?

12          A.   Yes.

13          Q.   And prior to working for Kindred in 2008



14 you worked at Centennial Hills, is that correct?

15 A. Yes.

16 Q. What did you do at Centennial Hills?

17 A. I was the administrative director for  
18 quality outcomes.

19 Q. When did you start that job?

20 A. Summer of '07. I think June.

21 Q. And between let's say June of '07, if  
22 that's when you started, sometime in the summer of  
23 '07, and January 20, 2008, what were you doing?  
24 Because the hospital wasn't opened yet.

25 A. Helping to get my areas of responsibility

10

1 ready to open.

2 Q. What were your areas of responsibility?

3 A. Quality, risk, infection control, medical  
4 staff office.

5 Q. What is "quality?"

6 A. It's looking at the processes and outcomes  
7 of care provided to patients.

8 Q. How do you do that?

9 A. Well, there's a lot off ways in which you

10 look at that, from setting up a plan, or how it's to  
11 be done; what are the roles and the responsibilities  
12 of each department director, how they will report  
13 their data. You teach them how to evaluate it, how  
14 to take actions.

15 Q. Is it safe to say that when you're looking  
16 at quality, that would be an after the fact issue, as  
17 opposed to before the fact? In other words, you're  
18 reviewing data?

19 A. Yes. Yes.

20 Q. In terms of "risk," tell me what that's all  
21 about.

22 A. It's very similar. You set up the  
23 processes, what the managers are responsible to do,  
24 and how do they report a concern if it arises.

25 Q. But aren't you also looking out for things

11

1 that could occur?

2 A. That's what your policy is each department  
3 manager is supposed to set up for their area.

4 Q. And how do they set that up? Is that in  
5 terms of a policy or procedure?

6 A. (Witness nods.)

7 Q. Is that a yes?

8 A. Yes.

9 Q. But for instance, I've heard "risk"  
10 described -- not in the hospital context, but like in  
11 the hotel context, where risk management would walk  
12 around the hotel looking for things that might hurt  
13 someone. For instance, a carpet that's not level, or  
14 something like that.

15 Is that something that would be  
16 part of your job as risk, something similar?

17 A. There could be components of that, where I  
18 would walk around and look.

19 But each manager has to  
20 determine -- for instance, your carpet example you  
21 gave me. That would be the director of plan ops.  
22 That would be part of his job, looking at plan  
23 operations, things that would be a potential risk to  
24 patients or staff.

25 Q. And I guess one of the procedures -- well,

12

1 do you work with the head of the departments to

2 create these policies and procedures?

3 A. The departments set their own policies and  
4 procedures up. If there is a component that relates  
5 to Joint Commission accreditation standards or the  
6 CMS conditions of participation, they may ask me to  
7 take a look at it or provide them a copy of the most  
8 current of those, so that they can ensure their  
9 policy is in full compliance with those.

10 Q. Infection control. I know what that is.

11 What is the medical staff office?

12 I don't understand that.

13 A. That has to do with the credentialing and  
14 privileging of physicians, nurse practitioners, and  
15 physician assistants.

16 Q. So that's what you did basically from the  
17 summer of 2007 until the hospital opened in January  
18 of '08, correct?

19 A. Yes.

20 Q. You were setting up all these processes and  
21 procedures and policies, things like that?

22 A. If it pertained to my area, yes.

23 Q. Right. And then when the hospital opened,  
24 what did you do then?

25 A. We started putting those processes in

1 place, setting up our meetings, having the people  
2 start monitoring and turning in the reports of their  
3 data.

4 My biggest role in that first few  
5 weeks was to work with the state when they came in  
6 and see that they had the policies, procedures;  
7 medical records, if they wanted to look at them.

8 Whatever the state wanted to look  
9 at. It was to see that whoever had the document they  
10 wanted, they brought it in and reviewed it with the  
11 state. I coordinated that process with them.

12 Q. Okay. When incidents would occur at the  
13 hospital -- for example, let's say a slip and fall --  
14 somebody slips and falls on some water somewhere in  
15 the hospital. Would you be involved in that?

16 A. If it was a patient.

17 Q. Okay.

18 A. Not an employee.

19 Q. Okay. Because worker's comp would not be  
20 part of your area, right?

21 A. Right.

22 Q. What if it was a visitor?

23 A. Yes.

24 Q. That would be part of your area?

25 A. Yes.

14

1 Q. What would that fall under? "Risk?"

2 A. Yes.

3 Q. Let me just stick with the slip and fall  
4 type thing. It's easier for a few minutes.

5 Assuming there was some kind of  
6 slip and fall or whatever, how would you go about  
7 investigating that?

8 A. The manager of the area where the patient  
9 fell -- there is a form they would complete.

10 They would investigate it,  
11 complete the documentation, review it with me, let me  
12 know if they needed to do something different. If it  
13 had been preventable, what could they do to prevent  
14 it, and then they would provide the document to me.

15 Q. What's the document?

16 A. It would be a -- every hospital has some  
17 kind of form or something.

18 Q. What was the form back at Centennial Hills?

19 A. I don't remember which form they had.

20 Q. Did they have a form, or did they have a  
21 system called Midas? Do you remember that?

22 A. Yeah, they had a Midas system. I don't  
23 remember what all went into it.

24 Q. Okay. And would you keep your own file  
25 about that? For example, the slip and fall would

15

1 happen. Would you keep your notes and things like  
2 that in a file?

3 A. If it went into the computer, my notes  
4 would probably be in the computer.

5 Q. Okay.

6 A. If it were notes for me to say, "Follow up  
7 on this or check on that," it might be in the paper  
8 file.

9 Q. Back in May of 2008 there was an incident  
10 involving Steven Farmer. Do you remember that?

11 A. A little bit.

12 Q. Tell me what you remember. Let's start  
13 with that.

14           A.    I remember being contacted to come talk  
15 with a patient. When I was talking with the patient,  
16 her concerns were of inappropriate touching. That  
17 immediately made this a police matter.

18                       I remember having security come to  
19 stay outside the door, checking with nursing to make  
20 sure that the nurse taking care of the patient that  
21 day was a female, and I made the request of only  
22 female caregivers for the remainder of the patient's  
23 stay. I notified the CEO of the facility, and I  
24 notified the police.

25                       When the police arrived at the

16

1 building I escorted them up to the patient's room and  
2 I waited at the nurses' station until the police were  
3 done, in case I needed to facilitate anything, if I  
4 could assist in any way.

5           Q.    Is that it?

6           A.    I went and made some notes, and at some  
7 point later in that day we had a conference call.  
8 Beyond that, that's about it.

9           Q.    Okay. Where did you make these notes?



10           A.    Upon discussion with my attorney and able  
11   to review them, I made them on a piece of paper.

12           Q.    I'm sorry, what was the first part of that?

13           A.    Upon discussion with my attorney and  
14   reviewing documents, they were on a piece of paper.

15           Q.    I don't understand that first part, "upon  
16   discussion with your attorney."

17                   MR. PRANGLE:  She talked to me.

18                   THE WITNESS:  On discussion with my  
19   attorney.

20   BY MR. MURDOCK:

21           Q.    In 2008?

22           A.    No.  This morning.

23           Q.    Oh.

24                   MR. PRANGLE:  I think she's telling you  
25   that after talking to me, she remembered.

17

1                   MR. MURDOCK:  Oh, okay.

2                   THE WITNESS:  I didn't remember what I  
3   had done with my notes.

4   BY MR. MURDOCK:

5           Q.    Okay.  Where are those notes today?

6 MR. PRANGLE: They're in my possession.

7 MR. MURDOCK: Is there a reason I don't  
8 have them?

9 Mr. PRANGLE: Because they relate  
10 solely to Cagnina.

11 Janet, is it correct all your  
12 notes were specific to the patient Cagnina?

13 THE WITNESS: Yes. They were my notes  
14 reminding me of things I needed to do.

15 BY MR. MURDOCK:

16 Q. What did you need to do?

17 A. Well, I wanted to make sure that the  
18 department managers remind their staff if a patient  
19 expresses discomfort with a caregiver, to not have  
20 that caregiver take care of them anymore.

21 Q. That was in the note?

22 A. Yeah. It was things like that to follow up  
23 on.

24 Q. Okay. So what does that have to do with  
25 Cagnina herself? That's just a general statement,

1 right?

2           A.    Right, but those are things that you do  
3   after an event.  You re-educate staff.

4           Q.    Well, you said "re-educate."  That assumes  
5   staff is educated, correct?

6           A.    The people that are hired are experienced  
7   people.

8           Q.    Well, were staff educated in that?

9           A.    I would not know what they were educated in  
10  prior to being hired at Centennial Hills.

11          Q.    So the notes that you wrote don't  
12  specifically say "re-educate staff," do they?

13          A.    I'd have to go back and look at them.

14          Q.    When was the last time you saw them?

15          A.    This morning.

16          Q.    So you reviewed those in preparation for  
17  your deposition today, is that correct?

18          A.    (Witness nods.)

19          Q.    Is that yes?

20          A.    Yes.  But I don't remember the exact word.  
21  It could have been "remind staff," "educate" --

22                   MR. MURDOCK:  I think I'm entitled to  
23  the notes.

24                   MR. PRANGLE:  And I'm going to  
25  disagree, because this was an event that happened two

1 days after Mrs. Doe's event, and it was things -- I  
2 guess in my possession, and maybe we can take it up  
3 with the Discovery Commissioner or someone else. And  
4 this was solely related to Cagnina. It had nothing  
5 to do with Doe.

6 MR. MURDOCK: But it goes to notice.  
7 It goes to foreseeability -- the whole thing about  
8 education and everything.

9 MR. PRANGLE: Well, if another event  
10 happened two days after that, they would do the same  
11 thing.

12 MR. MURDOCK: Yeah, but it's the same  
13 thing.

14 MR. PRANGLE: I will respectfully  
15 disagree.

16 MR. MURDOCK: Okay. I'm going to keep  
17 the deposition open, because I mean that's just not  
18 right. Now I understand the issue. Okay.

19 BY MR. MURDOCK:

20 Q. So what else did your notes say?

21 A. To also make sure that the managers

22 remember to tell their staff if they felt  
23 uncomfortable with the patient, to reassign them to a  
24 different patient.

25 To remind them that any time a

20

1 patient voices discomfort and wished to talk to  
2 somebody, to get the right person in there to talk  
3 with them immediately.

4 If they make any allegation of  
5 anything, to remind them to notify their supervisor  
6 immediately so they will notify the right person.

7 Q. Was there an issue that someone wasn't  
8 notified?

9 A. No.

10 Q. So I don't understand why you're  
11 re-educating about things that didn't happen.

12 A. Because that's what we do in quality and  
13 risk. We remind everybody of the things that they  
14 need to do as part of their job responsibilities when  
15 an event of any kind occurs.

16 Q. Okay.

17 A. That's just what we do. It's part of our

18 job.

19 Q. Okay. You said you had a conference call?

20 A. Yes.

21 Q. Who did you have a conference call with?

22 A. Kevin called somebody in legal and risk,  
23 and Kevin, myself, Carol -- and I don't remember if  
24 there was even anybody else in the room.

25 Q. Okay. And tell me about the phone call.

21

1 A. It was to relate the incident that  
2 occurred; that we had notified the police.

3 Q. Okay. So it was like a one-minute phone  
4 call?

5 A. I don't remember that. I don't remember.

6 Q. Did you take notes?

7 A. No.

8 Q. As a result of that conference did you do  
9 anything?

10 A. Just followed up on whatever was on my  
11 notes.

12 Q. Which notes?

13 A. That I had made after I talked with the

14 patient.

15 Q. And how did you follow up on that? How did  
16 you do that?

17 A. I picked up the piece of paper and I looked  
18 to make sure, "Let's have a department managers'  
19 meeting, let's talk to the managers," and that kind  
20 of thing.

21 Q. So there was a department managers' meeting  
22 after this, is that correct?

23 A. At some point.

24 Q. When was it?

25 A. I don't remember.

22

1 Q. Was it days after? Was it weeks after?  
2 What are we talking about here?

3 A. I don't remember. I could only speculate.  
4 I don't remember.

5 Q. So you had a department managers' meeting.  
6 Who was there?

7 A. I assume department managers.

8 Q. Was there an agenda?

9 A. I don't know.

10 Q. Did you pass out anything?

11 A. I don't remember.

12 Q. In terms of in writing, did you give them  
13 anything?

14 A. I didn't. I don't remember giving out  
15 anything.

16 Q. Okay. So you had the conference call. You  
17 had this department managers' meeting at some point.

18 Did you meet with any of the staff  
19 involved in the Roxanne Cagnina matter?

20 A. No.

21 Q. Did you meet with Christine Murray?

22 A. I don't know who Christine is.

23 Q. Do you remember having a meeting where you  
24 were present, Carol Butler was present, and Amy  
25 Bochenek was present, where you met several people

23

1 involved with the incident with Mr. Farmer?

2 A. No, I don't remember.

3 Q. Okay.

4 MR. MURDOCK: Let's mark this.

5 (Plaintiff's Exhibit 1 marked.)



6 BY MR. MURDOCK:

7 Q. I assume one of your jobs was to review the  
8 Midas system when there were incidents, is that  
9 right?

10 A. Yes.

11 Q. Let me show you what's been marked as  
12 Plaintiff's Exhibit 1. Have you ever seen that  
13 document before?

14 MR. VOGEL: What is that?

15 MR. PRANGLE: It's the Midas report.

16 THE WITNESS: Yes, this is the report  
17 they showed me.

18 BY MR. MURDOCK:

19 Q. So you saw that this morning?

20 A. I saw it last week.

21 Q. You saw it last week. And you saw that I  
22 assume within days of the incident with Mr. Farmer,  
23 correct?

24 A. I don't remember.

25 Q. Well, wouldn't that have been part of your

24

1 job, to review the Midas report?

2 A. Yes, sir.

3 Q. And wouldn't you have done it within days?

4 MR. PRANGLE: Do you remember, or did  
5 you have a custom?

6 THE WITNESS: I reviewed them, but I  
7 couldn't tell you when I reviewed this. I don't  
8 remember seeing this. I'm sure I probably did. It's  
9 seven years ago.

10 BY MR. MURDOCK:

11 Q. I understand. Nevertheless, it was part of  
12 your job to review these reports, correct?

13 A. Yes.

14 Q. How often did you review them? Did you  
15 review Midas reports on a daily basis, weekly basis,  
16 monthly basis? What are we talking about here?

17 A. Every day or two probably.

18 Q. Okay. So is it fair to say that this was  
19 put in -- I believe it was the 16th?

20 A. Yes.

21 Q. That you probably reviewed it within a  
22 couple days? Is that fair?

23 A. Probably.

24 Q. Okay. And look at the witnesses down on  
25 the second page. There's a couple witnesses listed,

1 is that correct?

2 A. It says "Employees." "Witness Data."

3 Okay. "Employees." Yes, there's three people  
4 listed.

5 Q. One of the people is Christine Murray, is  
6 that correct?

7 A. Yes.

8 Q. So Christine Murray was a witness who would  
9 have been identified on the Midas report that would  
10 have been within days of the incident, is that  
11 correct?

12 A. Yes. This says she was a witness to it.

13 Q. And is it your testimony that you never  
14 spoke with the witnesses?

15 A. I don't remember speaking with either one  
16 of those. The director of nursing and the CNO would  
17 be the ones who would speak with the nurses.

18 Q. But that's something that would have  
19 occurred, right?

20 A. I'm assuming it would have.

21 Q. There's also another name on there.

22 There's Lorraine Wescott. Do you see that?

23 A. Uh-huh.

24 Q. Is that a yes?

25 A. Yes.

26

1 Q. And then there's somebody else. Do you see  
2 that?

3 A. Beverly Bartley Lewis.

4 Q. Who is that?

5 A. I don't know.

6 Q. Do you have any idea who she is?

7 A. No, I do not.

8 Q. Did you investigate the incident at all in  
9 terms of risk?

10 A. When an issue is a legal issue, a police  
11 issue, as this became, no, we are usually  
12 coordinators of the process for the police, the  
13 attorneys, and stuff like that. We do not get  
14 involved in interviewing people and stuff like that.

15 Q. You're aware though, of course, that Carol  
16 Butler interviewed some people, right?

17 A. As the CNO she may have, yes.

18 Q. She certainly may have interviewed some of  
19 the witnesses?

20 A. She could have.

21 Q. Would that be part of her job?

22 MR. PRANGLE: Objection. Foundation.

23 THE WITNESS: Huh?

24 MR. PRANGLE: I just made an objection  
25 for the record. If you know the answer, you can give

27

1 it.

2 THE WITNESS: I don't know who she  
3 interviewed.

4 BY MR. MURDOCK:

5 Q. No, I understand that, but wouldn't as part  
6 of her job be interviewing those witnesses?

7 MR. PRANGLE: Same objection.

8 THE WITNESS: It could be a "yes" or  
9 "no" answer to that.

10 BY MR. MURDOCK:

11 Q. Just to your knowledge.

12 A. Because this was a police issue, if she  
13 interviewed it would be done under the direction of

14 our attorneys. They may have wanted to interview;  
15 they may have asked her to talk with them. I don't  
16 know. I do not remember after seven years who told  
17 who to do what. I wrote changes, when it's a police  
18 and legal issue.

19 Q. Sure. But of course you might have that in  
20 your notes?

21 MR. PRANGLE: Might have what?

22 BY MR. MURDOCK:

23 Q. As to who instructed you to do X or Y or Z,  
24 right?

25 A. I don't remember. My role took more of a

28

1 back seat coordinator role in this.

2 Q. Who were you coordinating for?

3 A. Our attorneys.

4 Q. Who was that?

5 A. I don't remember who they were.

6 Q. Can you give me an example? Can you give  
7 me a description of who they are? Short, heavy,  
8 tall?

9 A. Sir, it's been seven years ago. No, I

10 don't remember at all.

11 Q. Were you involved in the root cause  
12 analysis?

13 A. Probably.

14 Q. That's a document that you would have  
15 reviewed, wouldn't you have?

16 A. In this particular situation the root cause  
17 was handled by another person in the company.

18 Q. Who is that?

19 A. Ann Savin.

20 Q. Who is Ann Savin?

21 A. I don't remember Ann's title, but she was  
22 over all of the facilities as far as quality and  
23 risk.

24 Q. Who does she work for, or who did she work  
25 for?

29

1 A. I don't remember the name of her specific  
2 boss.

3 Q. Well, no, no. Did she work for Valley  
4 Health Systems?

5 A. Yes, she worked for Valley Health Systems.

6 Q. Okay. So you said the root cause was  
7 probably handled by Ann, correct?

8 A. Yes.

9 Q. But do you recall reviewing it?

10 A. I don't recall, but I'm sure I did.

11 Q. Why was Ann Savin given the task of  
12 handling the root cause analysis?

13 A. Ann was the quality and risk -- whatever  
14 her title was -- over all of the hospitals, and she  
15 tended to be involved in root cause analysis when it  
16 occurred in any hospital. That was just a routine  
17 part of her job.

18 Q. Okay. So I want to go back to these notes  
19 of yours.

20 You testified that your notes  
21 stated that you needed to remind staff if patients  
22 are uncomfortable?

23 A. Remind the managers to remind their staff.

24 Q. That if patients are uncomfortable, what?

25 A. Whatever they're uncomfortable about --

30

1 let's say it's a caregiver. Change caregivers. If



2 it's a staff person taking care of a caregiver and  
3 the staff person is uncomfortable, you change the  
4 staff person.

5                   You also in the situation  
6 remind -- I'm sure it's part of my notes to remind  
7 them that because this was a police matter, if media  
8 called in, to refer them to the public relations  
9 person we had at the hospital.

10           Q.    Why is that?

11           A.    Because we don't speak to the media. That  
12 is her job.

13           Q.    When you said "we," who is "we" -- "we"  
14 don't speak to the media?

15           A.    Employees. Managers.

16           Q.    Okay. So the employees of Valley Health  
17 System or at Centennial Hills Hospital are instructed  
18 not to speak to the media?

19           A.    They're not told they can't, but if someone  
20 calls on a case, you refer them to public relations.  
21 At least the managers do.

22           Q.    Are they allowed to speak to the police?

23           A.    If the police want to talk to somebody,  
24 yes, they can talk to somebody.

25           Q.    What if they have something to say to the

1 police, and the police don't contact them first? In  
2 other words, they contact the police. Is there a  
3 problem with that?

4 A. No. That's their right.

5 Q. And they didn't need to go through you?

6 A. No.

7 Q. So there was no problem with a nurse, for  
8 example, picking up the phone and calling the police  
9 and telling them they had information regarding  
10 Mr. Farmer. Is that correct?

11 A. If an employee wanted to do that and not  
12 inform the administrative team, then that was their  
13 right to do that.

14 Q. Do you recall ever meeting with any of the  
15 personnel involved with this matter?

16 A. No.

17 Q. And I'll throw some names out to you to see  
18 if you remember. If you don't, you don't.

19 Do you remember an individual by  
20 the name of Ray Sumera?

21 A. (Witness shook head.)

22 Q. Is that a no?

23 A. No. Sorry.

24 Q. Do you remember an individual by the name  
25 of Margaret Wolfe?

32

1 A. No.

2 Q. Do you remember an individual by the name  
3 of Karen Goodheart?

4 A. No.

5 Q. In terms of your coordination of efforts  
6 for your attorneys in this matter, did you obtain  
7 certain documents for them?

8 A. If they requested me to, I would.

9 Q. For example, did you ever provide any  
10 medical records to any of your attorneys in this  
11 matter?

12 A. A medical record? They would ask the  
13 medical record department for that record.

14 Q. Okay. Did you coordinate it though?

15 A. I don't remember.

16 Q. Well, wouldn't that be a risk issue?

17 A. Not necessarily, no.

18 Q. Did they need a HIPAA release to do that?

19 A. I don't know. I don't know if the attorney  
20 needed one or not.

21 Q. Did you ever instruct medical records,  
22 "Hey, as part of your risk analysis you're not to  
23 give these medical records to anybody without a  
24 release?"

25 A. The director of medical records would do

33

1 that -- would tell their staff how to do their job,  
2 and what the rules are on that.

3 Q. But wouldn't you oversee that?

4 A. No. If there was a problem, then the  
5 director would come to me and we would talk with  
6 whomever we would need to, to resolve an issue.

7 Q. Were you involved at all with setting up  
8 the procedures in terms of hiring people?

9 A. No.

10 Q. Wouldn't you agree with me that's part of  
11 risk, to hire the right people?

12 A. That's an HR function.

13 Q. But you weren't involved with that at all?

14 A. No. Only my two people -- or three people.

15 Q. Who were they?

16 A. The infection control practitioner, the  
17 performance improvement analyst, and the medical  
18 staff office manager.

19 Q. Who was the performance and improvement  
20 analyst?

21 A. I don't remember her name now.

22 Q. Why did you leave Centennial Hills?

23 A. The company that I had worked for prior to  
24 going to Centennial Hills twisted my arm and talked  
25 to me, and they made a job offer that I really

34

1 decided I would like. And I had enjoyed working with  
2 the company and I knew a lot of people I'd be working  
3 with, so I did finally decide to accept their offer.

4 Q. When the Cagnina incident began, did you  
5 start a file on it?

6 A. I don't remember.

7 Q. At some point I assume you became aware  
8 that it was more than just Roxanne Cagnina, is that  
9 correct, who was alleging things about Mr. Farmer?

10           A.    I'm not sure I understand what you're  
11   referring to.

12           Q.    Well, did you ever become aware that there  
13   were other women who alleged improper touching and  
14   assault?

15           A.    When Mr. Farmer went to trial and it was on  
16   the news, they talked about other women coming  
17   forward and stating that he had allegedly  
18   inappropriately touched them as well. Then I knew  
19   there were other people involved.

20           Q.    So before then you didn't know, is that  
21   correct?

22           A.    No.

23           Q.    At all?

24                   MR. PRANGLE: Yes, it's correct? He  
25   asked you if it was correct, and you said, "No."

35

1                   THE WITNESS: Yes, it's correct. I did  
2   not know of anyone else.

3   BY MR. MURDOCK:

4           Q.    Okay. Did you ever ask any of the other  
5   patients if they had been improperly touched by

6 Mr. Farmer?

7 A. No.

8 Q. In other words, did you go around and just  
9 make sure that this wasn't a facility-wide issue?

10 A. No.

11 Q. Why not?

12 A. Very honestly, I had never heard of going  
13 around and asking other patients like that. I never  
14 heard of it, never known of anyone who's done it, and  
15 no, I did not.

16 Q. Did you think about it?

17 A. No.

18 Q. The conference call that you were on -- was  
19 it discussed?

20 A. Sir, I don't remember that call of seven  
21 years ago.

22 Q. What is your overriding goal of your job at  
23 Centennial Hills?

24 MR. PRANGLE: Objection to form.

25 Vague. If you understand it, you can answer.

36

1

THE WITNESS: It was to coordinate the

2 various programs I was responsible for and see that  
3 all the people who feed into quality -- which is  
4 every employee, your physicians, your managers -- are  
5 doing the things that they need to do.

6 And the managers come to me if  
7 they have questions about what they're measuring, how  
8 they're doing.

9 My job was to coordinate all of  
10 these things and to see that the right things got  
11 reported to CMS.

12 BY MR. MURDOCK:

13 Q. But all of that -- using all of that is to  
14 just go out and really look out for the safety of the  
15 patients, right?

16 A. Yes. That's what it is all about.

17 Q. Right. Now, part of your job is to also  
18 foresee things. You're the person at Centennial  
19 Hills, for example, to put grossly, who's got the  
20 crystal ball, and you're looking out for things that  
21 might happen, right?

22 MR. PRANGLE: I object to form.

23 THE WITNESS: Huh?

24 MR. PRANGLE: I just made another  
25 objection for the record. If you understand the



1 question, you can answer it.

2 THE WITNESS: Well, if you're talking  
3 about say a potential for slip and falls, to use your  
4 example from earlier -- you know, I would walk the  
5 floors, looking around, making sure they weren't wet.

6 You know, making sure things were  
7 running, and check with the managers, any concerns,  
8 any issues, and things like that.

9 BY MR. MURDOCK:

10 Q. Right. But overall, again, like you said,  
11 it's for the safety of the patients. That's the  
12 paramount interest, right?

13 A. Uh-huh.

14 Q. Is that yes?

15 A. Yes.

16 Q. But in terms of looking out for the safety  
17 of the patients, you need to kind of foresee events  
18 that could occur.

19 For example, the reason that you  
20 wanted to re-educate these department managers, to  
21 remind them of things, is so that things don't happen

22 again, right?

23 A. That's what you you'd like to try to  
24 prevent.

25 Q. Right. Because you foresee things

38

1 happening. If they don't do these things that you  
2 reminded them of, things can be foreseen, right?

3 MR. PRANGLE: Objection to form. You  
4 can answer.

5 BY MR. MURDOCK:

6 Q. Go ahead.

7 A. Yes. That's what you try to do.

8 Q. Okay. Prior to starting your job at  
9 Centennial Hills, were you a risk manager elsewhere?

10 A. Yes, I had been.

11 Q. Where?

12 A. At Kindred, and California, and -- what was  
13 that hospital? Western Medical Center, and I think  
14 West Anaheim Medical Center. I had been a risk  
15 manager in maybe three.

16 Q. Is there a -- I don't know, kind of like a  
17 magazine that like every risk manager gets? Is that

18 something that you can tell me about?

19 A. There are various magazines out there. I  
20 don't know if any one is any better than the other.

21 Q. What are the ones that you read?

22 A. I usually read the National Quality  
23 Association one, and for awhile the -- there's a  
24 national risk group.

25 Q. Is there one just for hospitals -- hospital

39

1 risk managers?

2 A. Neither one of those were strictly  
3 hospitals.

4 Q. Is there one out there for strictly  
5 hospitals?

6 A. I don't know.

7 Q. Have you ever taken any courses in hospital  
8 risk management?

9 A. A long time ago.

10 Q. When?

11 A. It would be maybe 1990, '91, in through  
12 there.

13 Q. So let's say in between 1992 and May of

14 2008, is it safe to say you took no courses regarding  
15 risk management?

16 A. You go to seminars.

17 Q. I'm sorry?

18 A. You go to seminars.

19 Q. Okay. How often did you go to seminars?

20 A. That one I couldn't even -- I don't know.

21 Q. Were they yearly?

22 A. It would depend on when they were offered.

23 I mean sometimes they would be offered once a year;

24 sometimes not for a couple of years before there

25 would be anything offered.

40

1 Q. Are you a certified risk manager?

2 A. No.

3 Q. Are you a licensed risk manager?

4 A. No. I don't know of a licensing of risk  
5 management.

6 Q. Okay. Are you a member of a group that  
7 puts on seminars?

8 A. I used to be back in the '90s. I was a  
9 member for awhile of the -- whatever the national

10 risk group is.

11 Q. Were you ever a member of any group that  
12 was specific to hospital risk management?

13 A. I was a member of the quality group. It  
14 was a quality risk group -- probably late '90s or  
15 early 2000, I would have to guess.

16 It was a quality risk group. They  
17 weren't separate groups. Well, at least not where I  
18 was in Southern California, they didn't have separate  
19 groups.

20 Q. What was the name of that group.

21 A. I don't remember.

22 Q. Let's make it specific between 2007 and  
23 2008.

24 When you started at Centennial  
25 Hills Hospital -- between the time you started and

41

1 let's say May 16, 2008, did you attend any seminars  
2 during that time period?

3 A. I don't remember attending any during that  
4 time.

5 Q. Do you remember attending any seminars at

6 all ever specifically with regard to hospital risk  
7 management?

8 A. Not since I've moved to Nevada.

9 Q. When did you move to Nevada?

10 A. 2006.

11 Q. So before 2006 you might have attended some  
12 specific seminars with regard to hospital risk  
13 management, is that correct?

14 A. It's possible, but the meetings were  
15 usually quality and risk combined.

16 Q. And all I'm talking about right now is  
17 specific. So let's put it this way.

18 At least after 2006, or starting  
19 around 2006 when you moved to Nevada, you didn't  
20 attend any seminars specific to hospital risk; is  
21 that correct?

22 A. Not specific to hospital risk.

23 Q. Did you ever meet with the risk managers  
24 from the other Valley Health System hospitals?

25 A. Yes.

42

1 Q. How often?

2           A.    I think Ann had us meet once every other  
3   month or once a quarter.  At that point in time when  
4   I worked for them, we weren't separate.  You were  
5   quality and risk, and we met together as a group with  
6   Ann.  Probably about every other month maybe.

7           Q.    So since you started in 2007 in the summer,  
8   and you left early fall/late summer of 2008, is it  
9   safe to say there were probably approximately six  
10  meetings that you attended?  Is that correct?

11          A.    Probably, yes.

12          Q.    Was the Farmer situation discussed at any  
13  meeting?

14          A.    I don't remember that being discussed.  
15  Those were not confidential meetings.  Specific  
16  instances would not be discussed at meetings like  
17  that.

18          Q.    No, but what about things you learned from  
19  that incident?

20          A.    Generalities would be discussed, sure.

21          Q.    Right.  So was that discussed?

22          A.    I don't remember.  I can only tell you I  
23  would assume at some point we did, but I can't  
24  remember.

25          Q.    And at these meetings did you take notes?

1 A. No.

2 Q. Did anybody take notes?

3 A. Not that I remember.

4 Q. Would there be an agenda?

5 A. I don't know. I don't remember if there  
6 was even an agenda.

7 Q. At any of the hospitals that you were at  
8 was there ever an incident regarding a sexual  
9 assault?

10 A. At any hospital I've worked at ever?

11 Q. Yeah.

12 A. Yes.

13 Q. Where?

14 THE WITNESS: Do I name the hospital?

15 MR. PRANGLE: Go ahead.

16 THE WITNESS: Kindred. I remember one  
17 at Kindrred.

18 BY MR. MURDOCK:

19 Q. I'm not asking the patient's name.

20 A. Yeah. It was at one of the hospitals in  
21 Southern California. I honestly don't remember which



22 one. It was way too long ago.

23 Q. Was it a staff-on-patient sexual assault?

24 A. It was a patient alleging.

25 Q. That a staff member sexually assaulted her?

44

1 A. An inappropriate touching by staff.

2 Q. So you were aware when you went to  
3 Centennial Hills that a staff-on-patient sexual  
4 assault could happen, correct?

5 A. Sure.

6 MR. MURDOCK: Thank you. I have  
7 nothing further at this time.

8 MR. VOGEL: No questions.

9 MR. BIGGAR: No questions.

10 MR. PRANGLE: We'll reserve signature.

11 MS. HALL: I don't have any questions.

12

13 (The deposition concluded at 3:31 p.m.)

14

15

16

17

18

19

20

21

22

23

24

25

♀

45

1 REPORTER'S CERTIFICATE

2 STATE OF NEVADA )  
3 ) ss.  
4 COUNTY OF CLARK )

5 I, Carol O'Malley, Nevada Certified Court

6 Reporter 178, do hereby certify:

7 That I reported the taking of the deposition  
8 of JANET CALLIHAM on August 18, 2015 commencing at  
9 the hour of 1:30 p.m.;

10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole  
12 truth, and nothing but the truth;

13 That I thereafter transcribed my said  
14 shorthand notes into typewriting and that the

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 23rd day of August, 2015.

24

25 Carol O'Malley, CCR No. 178

♀

46

1 DEPOSITION ERRATA SHEET

2

3 File No. J0173225

4 Case Caption: Doe vs. Valley Health System

5

6

7

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I have  
11 read the entire transcript of my deposition taken in  
12 the captioned matter or the same has been read to me,  
13 and the same is true and accurate, save and except  
14 for changes and/or corrections, if any, as indicated  
15 by me on the DEPOSITION ERRATA SHEET hereof, with the  
16 understanding that I offer these changes as if still  
17 under oath.

18

19 Signed this day of ,20 .

20

21

22

JANET CALLIHAM

23

24

25

♀

47

1 DEPOSITION ERRATA SHEET

2 Page No. Line No. Change to:

3 Reason for change:

4 Page No. Line No. Change to:

5 Reason for change:

Page 54

6 Page No. Line No. Change to:  
7 Reason for change:  
8 Page No. Line No. Change to:  
9 Reason for change:  
10 Page No. Line No. Change to:  
11 Reason for change:  
12 Page No. Line No. Change to:  
13 Reason for change:  
14 Page No. Line No. Change to:  
15 Reason for change:  
16 Page No. Line No. Change to:  
17 Reason for change:  
18 Page No. Line No. Change to:  
19 Reason for change:  
20 Page No. Line No. Change to:  
21 Reason for change:  
22  
23  
24 SIGNATURE: JANET CALLIHAM DATE:  
25

48

2 Page No. Line No. Change to:  
3 Reason for change:  
4 Page No. Line No. Change to:  
5 Reason for change:  
6 Page No. Line No. Change to:  
7 Reason for change:  
8 Page No. Line No. Change to:  
9 Reason for change:  
10 Page No. Line No. Change to:  
11 Reason for change:  
12 Page No. Line No. Change to:  
13 Reason for change:  
14 Page No. Line No. Change to:  
15 Reason for change:  
16 Page No. Line No. Change to:  
17 Reason for change:  
18 Page No. Line No. Change to:  
19 Reason for change:  
20 Page No. Line No. Change to:  
21 Reason for change:

22

23

24 SIGNATURE:

JANET CALLIHAM

DATE:

25

TAB 74

Page 1

1 DISTRICT COURT  
2 CLARK COUNTY, NEVADA  
3 JANE DOE,  
4 Plaintiff,  
5 vs.  
6 CASE NO. 09-A-595780  
7 VALLEY HEALTH SYSTEM LLC,  
8 a Nevada limited  
9 liability company, d/b/a  
10 CENTENNIAL HILLS HOSPITAL  
11 MEDICAL CENTER; UNIVERSAL  
12 HEALTH SERVICES, INC., a  
13 Delaware corporation;  
14 AMERICAN NURSING  
15 SERVICES, INC., a  
16 Louisiana corporation;  
17 STEVEN DALE FARMER, an  
18 individual; DOES I  
19 through X, inclusive; and  
20 ROE CORPORATIONS I  
21 through X, inclusive,  
22 Defendants.  
23  
24  
25

DEPOSITION OF  
MARGARET WOLFE, RN

Wednesday, May 5, 2015  
9:30 a.m.

521 S. Third Street  
Las Vegas, Nevada

Carol O'Malley, CCR 178, RMR3

Page 2

1 APPEARANCES OF COUNSEL  
2 For Plaintiff:  
3 KEACH MURDOCK  
4 ROBERT E. MURDOCK, ESQ.  
5 520 S. Fourth Street  
6 Second Floor  
7 Las Vegas, Nevada 89101  
8 702.384.5563  
9 702.384.4570 Fax  
10 lasvegasjustice@aol.com  
11  
12 For Defendant Valley Health System LLC, d/b/a  
13 Centennial Hills Hospital Medical Center:  
14 HALL PRANGLE & SCHOONVELD, LLC  
15 JOHN F. BEMIS, ESQ.  
16 Suite 200  
17 1160 N. Town Center Drive  
18 Las Vegas, Nevada 89144  
19 702.889.6400  
20 702.384.6025 Fax  
21 jlbemis@hpslaw.com  
22  
23 For Defendant American Nursing Services, Inc.:  
24 LEWIS BRISBOIS BISGAARD & SMITH LLP  
25 AMANDA J. BROOKHYSER, ESQ.  
6385 S. Rainbow Boulevard  
Suite 600  
Las Vegas, Nevada 89118  
702.693.4320  
702.893.3383  
702.893.3789 Fax  
amanda.brookhyser@lewisbrisbois.com

26 PYATT & SILVESTRI  
27 JAMES P.C. SILVESTRI, ESQ.  
28 701 Bridger Avenue  
29 Las Vegas, Nevada 89101  
30 702.383.6000  
31 702.477.0088  
32 jsilvestri@psh-law.com

Page 3

1 APPEARANCES OF COUNSEL (Cont'd)  
2 For Defendant Farmer:  
3 CARROLL, KELLY, TROTTER,  
4 FRANZEN, McKENNA & PEABODY  
5 HEATHER S. HALL, ESQ.  
6 Suite 260  
7 8329 W. Sunset Road  
8 Las Vegas, Nevada 89113  
9 702.792.5755  
10 702.796.5855 Fax  
11 hshall@cktfmlaw.com  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 4

1 INDEX OF EXAMINATION  
2  
3 WITNESS: Margaret Wolfe, RN  
4  
5  
6  
7 EXAMINATION PAGE  
8  
9 By Mr. Murdock 5, 75  
10 By Mr. Silvestri 64, 76  
11 By Ms. Hall 74  
12  
13  
14  
15 INDEX TO EXHIBITS  
16  
17 EXHIBITS MARKED  
18 1 Voluntary Statement of Margaret Wolfe 44  
19  
20  
21  
22  
23  
24  
25



800.211.DEPO (3376)  
EsquireSolutions.com



Page 5

1 Deposition of Margaret Wolfe, RN  
2 May 6, 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 MARGARET WOLFE, 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. Margaret Wolfe.  
16 Q. Ms. Wolfe, have you ever had your  
17 deposition taken before?  
18 A. No.  
19 Q. Are you represented by counsel here?  
20 A. Yes.  
21 Q. Who is that?  
22 A. John Bemis.  
23 Q. How did you come to be represented by Mr.  
24 Bemis?  
25 A. I believe I was contacted by their office.

Page 6

1 Q. So he told you that you were going to be  
2 represented by him?  
3 A. They did.  
4 Q. They did?  
5 MR. BEMIS: I object to form.  
6 From the aspect of her acceptance  
7 of the representation, she can talk. But after that  
8 I'm going to instruct her not to answer about  
9 anything we talked about.  
10 BY MR. MURDOCK:  
11 Q. Go ahead.  
12 A. I was offered their representation, and I  
13 accepted it.  
14 Q. Okay. Good. How much are you paying?  
15 A. I'm not paying anything.  
16 Q. When you were offered their representation,  
17 did they tell you that they also allegedly represent  
18 a whole bunch of other people?  
19 MR. BEMIS: I object to form and  
20 instruct her not to answer anything we discussed.  
21 BY MR. MURDOCK:  
22 Q. Go ahead. You can answer the question, if  
23 you want.  
24 A. I'm going to take the advice of my  
25 attorney.

Page 7

1 Q. Okay. Did they also tell you -- or did Mr.  
2 Bemis tell you that he helped Mr. Farmer out during  
3 the criminal trial?  
4 MR. BEMIS: I'm going to instruct her  
5 not to --  
6 BY MR. MURDOCK:  
7 Q. Did he tell you that he provided documents  
8 to Mr. Farmer, so he could help out his criminal  
9 case?  
10 MR. BEMIS: I'm going to instruct her  
11 not to answer anything that her and I discussed.  
12 BY MR. MURDOCK:  
13 Q. Did he tell you that he actually represents  
14 the hospital, and not you, even here today?  
15 MR. BEMIS: You can answer, but you're  
16 not to answer anything you and I discussed.  
17 BY MR. MURDOCK:  
18 Q. Are you going to take your counsel's word  
19 for it?  
20 A. Yes, I am.  
21 Q. Okay. When did you get that phone call  
22 where they offered to represent you?  
23 A. Approximately a month ago. I don't  
24 remember exactly.  
25 Q. And who called you specifically? Do you

Page 8

1 remember?  
2 A. It was a female. I don't remember her  
3 name.  
4 Q. Was she a lawyer?  
5 A. I don't know.  
6 Q. And in that phone call was she the one who  
7 said, "We would like to represent you," or something  
8 like that, or offered to represent you?  
9 A. I believe so.  
10 Q. Did she tell you about any potential  
11 conflicts of interest between yourself and the  
12 hospital?  
13 MR. BEMIS: I'm going to instruct her  
14 not to answer anything that's been discussed with  
15 myself or my firm.  
16 BY MR. MURDOCK:  
17 Q. Do you know if she was actually even from  
18 their firm, whoever this person was?  
19 A. I'm assuming that she is. I don't know for  
20 a fact.  
21 Q. Okay. Do you remember her name?  
22 A. No.  
23 Q. Did she tell you she was from their firm?  
24 A. She told me she was from a firm. I don't  
25 remember the name of that firm.

<p style="text-align: right;">Page 9</p> <p>1 Q. Okay. And prior to your agreeing to be 2 represented by her -- so in other words, you had not 3 agreed to let them represent you at that point -- 4 tell me about the conversation you had. 5 A. She told me that there was a deposition 6 that they wanted to do, that they wanted me to be a 7 part of, and would I be willing to help them out with 8 that. 9 Q. And you said? 10 A. And I said, "Yes." 11 Q. And what else? 12 A. I believe at that point she offered the 13 representation, and I accepted. 14 Q. Did she tell you that you needed 15 representation? 16 MR. BEMIS: Objection to after -- 17 MR. MURDOCK: Prior. Prior. 18 BY MR. MURDOCK: 19 Q. Did she tell you that you needed 20 representation? 21 A. No. 22 Q. Did she advise you that she thought you 23 should be represented? 24 A. No. 25 Q. Did you believe you needed to be</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. When were the phone conversations? Do you 2 remember? 3 A. Within the last couple of weeks. 4 Q. Now, your deposition was originally set for 5 last week? 6 A. Yes. 7 Q. You're aware of that, right? 8 A. Yes. 9 Q. But you did not show up, is that correct? 10 A. That's correct. 11 Q. And why didn't you show up? 12 A. I had a conflict of interest with my 13 employer. I did try to cancel the deposition, and 14 apparently was unable to, and I had a choice to make 15 of where I had to be. 16 I had a mandatory education that I 17 had to do with my employer, that had I not shown up 18 to that, I would have been suspended. 19 Q. Okay. 20 A. And so I chose to keep my job. 21 Q. Did you tell Mr. Bemis that? 22 MR. BEMIS: I'm going to tell her not 23 to respond to anything her and I discussed. 24 BY MR. MURDOCK: 25 Q. Did Mr. Bemis tell you there was a court</p>
<p style="text-align: right;">Page 10</p> <p>1 represented, for any reason whatsoever? 2 MR. BEMIS: Calls for speculation. 3 BY MR. MURDOCK: 4 Q. Go ahead. 5 A. I'm not sure if I should answer or not. 6 Q. Well, did you believe that you needed to be 7 represented, prior to her offering you 8 representation? 9 A. No. 10 Q. In other words, was there any reason in 11 your head that you thought, "Hey, maybe I should get 12 a lawyer?" 13 A. No. 14 Q. But when they offered it, you accepted it, 15 right? 16 A. Yes. 17 Q. It's free, right? 18 A. Well, that was part of it. 19 Q. Okay. And without telling me the contents 20 of the discussions, did you at some point have a 21 discussion with Mr. Bemis? 22 A. Yes. 23 Q. When was that? 24 A. We've had a few conversations on the phone, 25 and then one yesterday.</p>	<p style="text-align: right;">Page 12</p> <p>1 notice for you to be here last week? 2 MR. BEMIS: I'm going to instruct her 3 not to answer anything that her and I discussed. 4 BY MR. MURDOCK: 5 Q. Did he tell you that? 6 A. I'm going to take his advice. 7 Q. Did he tell you that you could be 8 sanctioned? 9 MR. BEMIS: I'm going to instruct her 10 not to answer anything that her and I discussed. 11 BY MR. MURDOCK: 12 Q. Did he tell you that he could be 13 sanctioned? 14 MR. BEMIS: I instruct her not to 15 answer anything that her and I discussed. 16 BY MR. MURDOCK: 17 Q. Did he tell you that he attempted to get 18 the Court to change it by filing a motion, but the 19 Court refused? 20 MR. BEMIS: I'm going to instruct her 21 not to answer anything that her and I have discussed. 22 BY MR. MURDOCK: 23 Q. Did he tell you that he was too late in 24 filing the motion, despite the fact he could have 25 filed something earlier? Did he tell you that?</p>

Page 13

1 MR. BEMIS: I'm going to instruct her  
2 not to answer anything her and I discussed.  
3 BY MR. MURDOCK:  
4 Q. Did he tell you that he fell below the  
5 standard of care already in representing you? Did he  
6 tell you that?  
7 MR. BEMIS: I'm going to instruct her  
8 not to answer anything that her and I discussed.  
9 BY MR. MURDOCK:  
10 Q. You're currently a nurse, correct?  
11 A. Yes.  
12 Q. And where are you a nurse at?  
13 A. UMC pediatric ER.  
14 Q. Now, Ms. Wolfe, you have no legal training,  
15 do you?  
16 A. No.  
17 Q. You're not a lawyer?  
18 A. No.  
19 Q. You're not a paralegal?  
20 A. No.  
21 Q. You haven't gone to school for any legal  
22 things?  
23 A. Nothing.  
24 Q. Do you know what perjury is?  
25 A. Yes, I do.

Page 14

1 Q. What is perjury?  
2 A. Lying under oath.  
3 Q. Do you know that it is a crime to lie to  
4 the police?  
5 A. Yes, I do.  
6 Q. Do you know that it is a crime to obstruct  
7 justice?  
8 A. Yes.  
9 Q. Do you know that it is a crime to obstruct  
10 justice by lying to the police?  
11 A. Yes.  
12 Q. Prior to this deposition you were sitting  
13 in my lobby, correct?  
14 A. Yes.  
15 Q. And I came to speak with you, correct?  
16 A. Yes.  
17 Q. And at that time I did not have an actual  
18 conversation with you, did I?  
19 A. No.  
20 Q. On the other hand, I spoke, correct?  
21 A. Correct.  
22 Q. I didn't ask you one question, correct?  
23 A. Right.  
24 Q. Do you know Steven Farmer?  
25 A. Yes.

Page 15

1 Q. Who is he?  
2 A. He was a CNA that worked at Centennial  
3 Hospital at the same time I was there.  
4 Q. What did he look like?  
5 A. Poppa Smurf. Sorry. He had a white beard,  
6 white hair, medium stature.  
7 Q. Did you give a statement to the police a  
8 couple days -- well, actually it would have been  
9 maybe a couple weeks after he was arrested, in 2008?  
10 A. Yes.  
11 Q. Did you lie to the police?  
12 A. No.  
13 Q. Did you make up any stories to tell the  
14 police?  
15 A. No.  
16 Q. After you spoke with the police, did you  
17 speak with anybody at Centennial Hills Hospital about  
18 what you told the police?  
19 A. I don't recall.  
20 Q. Who was your director of nursing at the  
21 time? Do you remember?  
22 A. Amy Bochenek.  
23 Q. That's how you pronounce it?  
24 A. (Witness nods.)  
25 Q. Is that a yes?

Page 16

1 A. Yes.  
2 Q. Now, do you recall speaking with Amy --  
3 A. Yes.  
4 Q. I'm sorry, let me finish my question.  
5 A. Okay.  
6 Q. The only reason is, she's going to get mad  
7 at me.  
8 Do you recall speaking with Amy  
9 about Mr. Farmer?  
10 A. Yes.  
11 Q. Was that before or after he was arrested?  
12 A. It was after, because the situation  
13 happened on the same day.  
14 Q. Right. Okay. And you went to Amy to  
15 discuss the situation with Ms. Hanna, is that  
16 correct?  
17 A. I didn't go directly to Amy, no.  
18 Q. Who did you go to?  
19 A. I went to my charge nurse that was on that  
20 shift.  
21 Q. Who was that, by the way?  
22 A. Ray Sumera.  
23 Q. Now, Ray testified the other day that he  
24 was a relief charge nurse.  
25 A. Uh-huh.

Page 17

1 Q. Is that a yes?  
2 A. Yes.  
3 Q. What is a relief charge nurse?  
4 MR. BEMIS: I object to form. Go ahead  
5 and answer.  
6 THE WITNESS: A relief charge nurse  
7 fills in when the permanent charge nurse is not  
8 available.  
9 BY MR. MURDOCK:  
10 Q. Okay. Why did you go to Ray to talk about  
11 that incident?  
12 A. Because that's my chain of command that I  
13 would follow.  
14 Q. Have you seen the transcript of the  
15 conversation you had with Detective Saunders?  
16 A. Yes.  
17 Q. Do you recall any mistakes in that  
18 transcript?  
19 A. No.  
20 Q. So you went to Ray because of the chain of  
21 command. After you went to Ray, did you go to  
22 somebody else?  
23 A. Yes.  
24 Q. Is that when you went to Amy?  
25 A. No.

Page 18

1 Q. Who did you go to?  
2 A. I spoke with the nurse that I was giving  
3 report to at shift change.  
4 Q. Who was that? Do you remember?  
5 A. Her name is Julie. I don't remember her  
6 last name.  
7 Q. And when did you wind up speaking with Amy?  
8 A. Later that day she called me.  
9 Q. So somehow it got back up to her?  
10 A. Yes.  
11 Q. Were you at home at the time?  
12 A. Yes.  
13 Q. And my guess is that you repeated  
14 everything you told Ray, correct?  
15 A. Yes.  
16 Q. And also everything you told Julie,  
17 correct?  
18 A. Correct.  
19 Q. Did you lie to them?  
20 A. No.  
21 Q. Prior to the day you spoke with Amy and the  
22 day you spoke with Julie, and the day you spoke with  
23 Ray when the incident with Ms. Hanna occurred, had  
24 you ever spoken to anybody before about Mr. Farmer?  
25 A. Yes.

Page 19

1 Q. Who did you speak to?  
2 A. Ray Sumera, and probably a couple other ER  
3 nurses, but I don't recall exactly who.  
4 Q. And when would that have been? Do you  
5 recall?  
6 A. Just throughout the course of his  
7 employment in the ER.  
8 Q. And do you recall what you discussed?  
9 A. I told them that he made me very  
10 uncomfortable, especially around female patients, and  
11 I did not want him in my female patients' rooms.  
12 Q. What made you uncomfortable?  
13 A. He was overly helpful with female patients,  
14 and it was just a feeling I had that made me  
15 uncomfortable and uneasy around him.  
16 He would go into females rooms  
17 when there was no need for him to be in there,  
18 sometimes with the door or the curtain shut, and I  
19 felt that was inappropriate.  
20 Q. And you had voiced this to Ray prior to the  
21 incident with Ms. Hanna?  
22 A. Yes.  
23 Q. And would it have been weeks and/or a month  
24 prior?  
25 A. Weeks.

Page 20

1 MR. SILVESTRI: I'm sorry, what was it?  
2 THE WITNESS: Weeks.  
3 MR. SILVESTRI: Thank you.  
4 BY MR. MURDOCK:  
5 Q. And when you had this discussion with Ray,  
6 what did he say -- the discussion weeks before?  
7 A. I don't recall.  
8 Q. Did he say he would take care of it?  
9 A. He did say he would talk to him.  
10 Q. When you had this conversation with Ray  
11 several weeks before, why did you have the  
12 conversation with Ray?  
13 A. Because I felt it better for a male to be  
14 talking to a male about it, than me to be approaching  
15 Mr. Farmer.  
16 Q. Was it also because Ray was a relief charge  
17 nurse?  
18 A. No.  
19 Q. But nevertheless, Ray was a relief charge  
20 nurse?  
21 A. Correct.  
22 Q. Now, a relief charge nurse is not always  
23 the charge nurse?  
24 A. Correct.  
25 Q. It's just when the charge nurse is not

Page 21

1 there, he becomes the relief charge nurse?  
2 A. Right.  
3 Q. Now, is that because the charge nurse is  
4 absent, or for example because the charge nurse has  
5 gone to lunch, or something like that?  
6 A. No. The permanent charge nurse is not  
7 scheduled that day.  
8 Q. Okay. But you knew at the very least when  
9 you had these discussions with Ray, several weeks  
10 prior to the Denise Hanna discussion, that Ray was a  
11 relief charge nurse?  
12 A. Yes.  
13 Q. He may not have been at the time, but he  
14 certainly was a relief charge nurse, correct?  
15 A. Yes.  
16 Q. Okay. So I'd like to know a little bit  
17 more about the discussion you had with Ray several  
18 weeks before.  
19 A. Okay.  
20 Q. So I want to talk about that for right now,  
21 okay?  
22 A. (Witness nods.)  
23 Q. You said that he was overly attentive --  
24 that Farmer was overly attentive with female  
25 patients?

Page 22

1 A. Yes.  
2 Q. Now, you had not seen him assault anyone,  
3 correct?  
4 A. No, not at that point.  
5 Q. You had not seen him rape anyone?  
6 A. No.  
7 Q. Now, you said that he would go into rooms  
8 of patients and you weren't there, and close the  
9 door?  
10 A. Uh-huh.  
11 Q. How did you know that --  
12 MR. SILVESTRI: Hold on. Ma'am, you  
13 have to answer out loud.  
14 MR. MURDOCK: Yeah, I'm sorry.  
15 MR. SILVESTRI: "Yeses" and "nos,"  
16 because the court reporter will have a difficult time  
17 with that.  
18 THE WITNESS: Okay. Sorry.  
19 MR. SILVESTRI: So can we get a clear  
20 answer on these? I'm sorry.  
21 MR. MURDOCK: No, no. That's okay.  
22 BY MR. MURDOCK:  
23 Q. Now, when you said that he would go into  
24 rooms of patients and close the doors -- you  
25 witnessed that, correct?

Page 23

1 A. Yes.  
2 Q. And that was one of the things you  
3 complained to Ray about, correct?  
4 A. Yes.  
5 Q. And why did you go to Ray about that? Not  
6 personally Ray, but why did you go to anybody about  
7 that?  
8 A. I went to Ray about it because I trusted  
9 him. I knew that he would keep it in confidence  
10 between he and I, and I knew that he would follow  
11 through and speak with him, as I asked him to.  
12 Q. Sure.  
13 A. And he had a little bit of authority, being  
14 that he was a relief charge nurse. It gave him a  
15 little bit more leverage.  
16 Q. Sure. Did you ever go to speak with the  
17 patients of the rooms that Mr. Farmer was in?  
18 A. No.  
19 Q. Why not?  
20 A. I didn't want to accuse somebody falsely of  
21 something, and I didn't want to raise any red flags  
22 with patients.  
23 Q. Okay. But yet you were concerned about  
24 Farmer?  
25 A. Yes.

Page 24

1 Q. Was he also in rooms with patients with the  
2 lights out? Is that what I heard you say, or not?  
3 A. No, I never said that.  
4 Q. Okay. That's somebody else.  
5 So he would walk into rooms, close  
6 the door?  
7 A. Yes.  
8 Q. That's not appropriate for a CNA, is it?  
9 MR. BEMIS: I object to form. Go ahead  
10 and answer, if you know.  
11 THE WITNESS: It's inappropriate for a  
12 male patient to be in a room with a female patient  
13 alone with the door closed.  
14 BY MR. MURDOCK:  
15 Q. Why is that?  
16 A. Because of the fact that allegations can be  
17 made and people can be accused of things that may or  
18 may not be true.  
19 Q. It's not just allegations can be made,  
20 things can actually happen, right?  
21 A. Yes.  
22 MR. SILVESTRI: Ms. Reporter, can you  
23 read back the last answer? Actually, the last  
24 question and answer.  
25 (The following was read:)

Page 25

1 "Q. Was he also in rooms with patients with the  
2 lights out? Is that what I heard you say, or  
3 not?  
4 A. No, I never said that.  
5 Q. Okay. That's somebody else. So he would  
6 walk into rooms, close the door?  
7 A. Yes.  
8 Q. That's not appropriate for a CNA, is it?  
9 MR. BEMIS: I object to form. Go ahead  
10 and answer, if you know.  
11 THE WITNESS: It's inappropriate for a  
12 male patient to be in a room with a female  
13 patient alone with the door closed.  
14 Q. Why is that?  
15 A. Because of the fact that allegations can  
16 be made and people can be accused of things  
17 that may or may not be true.  
18 Q. It's not just allegations can be made,  
19 things can actually happen, right?  
20 A. Yes."  
21 BY MR. MURDOCK:  
22 Q. And your answer was?  
23 A. Yes.  
24 Q. When I say "things can actually happen,"  
25 that would include sexual assaults, correct?

Page 26

1 A. Yes.  
2 MR. BEMIS: I object to form.  
3 BY MR. MURDOCK:  
4 Q. And that's one of the reasons why male CNAs  
5 should not be in female patients' rooms with the door  
6 closed, correct?  
7 MS. HALL: Objection. Lacks  
8 foundation. Speculation.  
9 MR. BEMIS: Join. Go ahead and answer.  
10 THE WITNESS: Correct.  
11 BY MR. MURDOCK:  
12 Q. Apparently another nurse also discussed  
13 Mr. Farmer with you, is that correct, prior to the  
14 Denise Hanna situation?  
15 A. Not to my knowledge.  
16 Q. There was a nurse by the name of Kim, and  
17 my understanding is that you told Detective Saunders  
18 that Kim relayed some concerns to you also, and that  
19 would have been the same concerns that Ray had said  
20 about his actions were suspicious, especially with a  
21 female patient?  
22 A. Yes, I do recall that now.  
23 Q. Okay. And who was Kim? Do you remember?  
24 A. Just a staff nurse there in the ER.  
25 Q. And Kim had had a conversation with you or

Page 27

1 with Ray, or both?  
2 A. I believe both of us, but I know with me.  
3 Q. And why do you believe both of you?  
4 A. Because all the nurses were talking about  
5 it together. It wasn't just me. It wasn't just Ray.  
6 All the nurses were concerned.  
7 Q. When you say "all the nurses" -- all the  
8 nurses on the shift?  
9 A. Yes.  
10 Q. Can you identify some of them? I know it's  
11 been a long time, but could you identify some of  
12 them, at least by first name?  
13 A. Gina, Kim --  
14 MR. SILVESTRI: Kim?  
15 THE WITNESS: Kim.  
16 MS. HALL: Can you just keep your voice  
17 up a little bit? It's hard for us to hear you down  
18 here.  
19 THE WITNESS: Okay.  
20 MS. HALL: Thank you.  
21 THE WITNESS: I worked with Karen, but  
22 I don't recall if we had any conversations about it  
23 or not.  
24 BY MR. MURDOCK:  
25 Q. Okay.

Page 28

1 A. I don't recall any other names, it was so  
2 long ago.  
3 Q. Okay. Suffice to say, if I would have  
4 taken your deposition much closer in time to the  
5 events occurring, you would have been able to give me  
6 the names, correct?  
7 A. Yes.  
8 Q. Okay. Now, let's talk about Kim --  
9 specifically Kim, and then we'll get to the other  
10 people.  
11 But Kim -- you had a discussion  
12 with her about Ray?  
13 A. About Ray?  
14 Q. I'm sorry. That was bad. That was bad.  
15 (Discussion off the record.)  
16 BY MR. MURDOCK:  
17 Q. You were telling me about conversations you  
18 had with Kim about Steven.  
19 A. Yes.  
20 Q. Tell me about those conversations.  
21 A. I don't remember exact details, just the  
22 fact that I had shared these same concerns I've  
23 already voiced, with her, and she felt the same way.  
24 Q. So in other words, he was being overly  
25 attentive with female patients?

Page 29

1 A. Yes.  
2 Q. And you both were suspicious about him,  
3 correct?  
4 A. Yes.  
5 Q. And when I just asked you about being  
6 suspicious about him, what were you suspicious of?  
7 A. I think "uncomfortable" is a better word  
8 than "suspicious."  
9 Q. Okay. And the reason I'm using the word  
10 "suspicious," to be honest with you, is because you  
11 used it in your conversation with Detective Saunders.  
12 A. Okay.  
13 Q. You said that Kim relayed some concern to  
14 you, the same concerns that Ray had said, about his  
15 actions were suspicious, especially with female  
16 patients.  
17 So what were you trying to convey  
18 when you used the word "suspicious" in that context?  
19 A. That there could be some actions happening  
20 by Mr. Farmer that were inappropriate.  
21 Q. Looking back at it, was it just that he was  
22 overly attentive with female patients, or was it a  
23 certain type of female patient? In other words, was  
24 it a type of female patient who maybe couldn't  
25 complain?

Page 30

1 A. I didn't notice that.  
2 Q. Okay. Now, you also said that all of the  
3 nurses were talking about it.  
4 A. Yes.  
5 Q. So it was pretty common knowledge over at  
6 Centennial Hills Hospital, right?  
7 A. Yes.  
8 MR. BEMIS: I object to form.  
9 BY MR. MURDOCK:  
10 Q. And the conversations that you had with  
11 these other nurses were basically all the same, that  
12 he was overly attentive with female patients,  
13 correct?  
14 A. Yes.  
15 Q. That he was acting at least in a suspicious  
16 manner?  
17 A. Yes.  
18 Q. And that he was -- what was the word you  
19 wanted to use besides "suspicious?"  
20 A. "Inappropriate."  
21 Q. "Inappropriate." Is that correct?  
22 A. Yes.  
23 Q. And it was all related to the same thing,  
24 where he would go into female patients' rooms and  
25 close the door, correct?

Page 31

1 A. Correct.  
2 Q. That he would be overly helpful with  
3 putting certain devices on, is that correct?  
4 A. Yes.  
5 MR. BEMIS: I object to form.  
6 BY MR. MURDOCK:  
7 Q. And those devices were basically -- it  
8 wasn't blood pressure cuffs, correct?  
9 A. No.  
10 Q. It wasn't taking someone's temperature,  
11 right?  
12 A. Right.  
13 Q. It was a medical device whereby he would be  
14 able to see female private areas. Would that be  
15 correct?  
16 MR. BEMIS: I object to form. Go ahead  
17 and answer, if you know.  
18 THE WITNESS: Yes.  
19 BY MR. MURDOCK:  
20 Q. Okay. And that would include heart  
21 monitors?  
22 A. Yes.  
23 Q. And there was a discussion the other day  
24 about whether it's a 3-lead heart monitor, a 5-lead  
25 heart monitor, or a 12.

Page 32

1 When you saw him be overly  
2 attentive regarding these heart monitors, was it with  
3 a 3, a 5, a 12 -- all?  
4 A. 5.  
5 Q. It was a 5?  
6 A. It was a 5.  
7 Q. So with a 5-lead heart monitor, where would  
8 the monitors be placed?  
9 MR. BEMIS: I object to form. Go  
10 ahead.  
11 BY MR. MURDOCK:  
12 Q. Or actually they're not monitors.  
13 They're --  
14 A. Patches.  
15 Q. The patches. Where would those patches be  
16 placed?  
17 MR. BEMIS: Same objection. Answer, if  
18 you can.  
19 THE WITNESS: There's 2 leads that go  
20 under both clavicles. There is a lead that goes on  
21 both sides.  
22 BY MR. MURDOCK:  
23 Q. The ribs?  
24 A. Yes, on the ribs.  
25 Q. Okay.

Page 33

1 A. And then there's one that goes on the  
2 sternum.  
3 Q. Now, in some women, depending on the size  
4 of their breasts, you would need to move the breast  
5 in order to place those patches, correct?  
6 A. Correct.  
7 Q. And that is what he was overly attentive  
8 in?  
9 MR. BEMIS: I object to form. Calls  
10 for speculation.  
11 BY MR. MURDOCK:  
12 Q. In placing the patches. Not holding the  
13 breast, but placing the patches?  
14 A. I never saw him place patches on a patient.  
15 Q. Okay.  
16 A. Just in the situation I observed, the  
17 patches were already in place and he appeared to be  
18 checking them.  
19 Q. Okay. Is that something that a CNA should  
20 do?  
21 MR. BEMIS: I object to form. Go ahead  
22 and answer, if you know.  
23 THE WITNESS: No. Especially when  
24 there's no alarms going off, and the patient is  
25 comfortable and the nurse is standing right there.

Page 34

1 That is out of line for a CNA.  
2 BY MR. MURDOCK:  
3 Q. And that's one of the things that made you  
4 suspicious, correct?  
5 A. Yes.  
6 Q. And that's one of the things that made you  
7 go speak to Ray, correct?  
8 A. Yes.  
9 Q. When he would check those patches, would he  
10 have to undo the gown of the patient?  
11 A. There's a way to do it that you don't have  
12 to expose the patient, but he did expose the patient  
13 when he checked them.  
14 Q. Okay. And again, this was one of the  
15 things that was well-known to Centennial Hills staff,  
16 correct?  
17 MR. BEMIS: I object to form. Calls  
18 for speculation. Answer, if you can.  
19 BY MR. MURDOCK:  
20 Q. Correct?  
21 A. No.  
22 Q. What was well-known to Centennial Hills  
23 staff?  
24 A. Just our suspicions of him. Not anything  
25 concrete.

Page 35

1 Q. But you certainly had a suspicion?  
2 A. Yes.  
3 Q. And it arose because -- at least one thing,  
4 he was opening patients' gowns to check their leads  
5 when no alarms had gone off, or things like that,  
6 right?  
7 A. That was one situation I had observed.  
8 Q. So that was one. And were there other  
9 situations that you had observed?  
10 A. Doing the same thing, no.  
11 Q. Well, what else would he do? Besides the  
12 heart patch, what else?  
13 A. Well, the things I just mentioned about  
14 being in rooms alone. Transporting patients between  
15 units, he was gone an extended period of time --  
16 longer than he should have been. Things like that.  
17 Q. And again, everything together made you  
18 suspicious?  
19 A. Right.  
20 Q. It wasn't just one thing?  
21 A. Yes.  
22 Q. After you saw him with the heart patch  
23 issue -- I assume that was several weeks before the  
24 incident with Denise Hanna?  
25 A. That was Denise Hanna.

Page 36

1 Q. Oh, that was Denise Hanna.  
2 A. Yes.  
3 Q. So prior to the Denise Hanna incident, you  
4 had a suspicion of Mr. Farmer because he was in rooms  
5 alone with patients, correct?  
6 A. Correct.  
7 Q. He was gone extended periods of time,  
8 correct?  
9 A. Yes.  
10 Q. Any other suspicions? Because you said he  
11 was overly attentive with females.  
12 A. Right.  
13 Q. Explain that.  
14 A. He would always offer to help care for  
15 female patients, whereas he didn't offer that with  
16 the males.  
17 Q. And that was several weeks before the  
18 incident with Denise Hanna?  
19 A. Yes.  
20 Q. So in other words, just so I've got this  
21 right, Denise Hanna was basically the culmination?  
22 A. Yes.  
23 Q. Would you agree with that?  
24 A. Yes.  
25 Q. But before the Denise Hanna incident, at



Page 37

1 least several weeks before, that's when the  
2 suspicions started -- where he would be in rooms  
3 alone with patients, where he was gone for extended  
4 periods of time when he was transporting patients,  
5 and where he would always offer to help female  
6 patients, as opposed to male patients, correct?  
7 A. Correct.  
8 MR. BEMIS: I object to form.  
9 BY MR. MURDOCK:  
10 Q. And in terms of the gone extended periods  
11 of time with transporting patients, that would have  
12 been with females patients, correct?  
13 MR. BEMIS: I object to form. Calls  
14 for speculation.  
15 THE WITNESS: Correct.  
16 BY MR. MURDOCK:  
17 Q. And the being in rooms alone -- again, that  
18 would be with female patients, as opposed to male  
19 patients, correct?  
20 MR. BEMIS: Same objection. Go ahead  
21 and answer.  
22 THE WITNESS: I can't say that it  
23 wasn't ever with a male patient, but we noticed it  
24 more with female patients.  
25

Page 38

1 BY MR. MURDOCK:  
2 Q. Okay. And when you say "we," who is "we?"  
3 A. The nursing staff.  
4 Q. Now, who was your charge nurse on the  
5 nightshift? Did you have one?  
6 A. We had a couple of them.  
7 Q. Who were they?  
8 A. One of them was Amy.  
9 Q. Amy who?  
10 A. I don't remember her last name.  
11 Q. Okay.  
12 A. And the other one was Danielle, and I don't  
13 remember her last name.  
14 Q. Okay. And then the relief would have been  
15 Ray?  
16 A. Yes.  
17 Q. Were Amy and Danielle made aware of these  
18 suspicions that were had by the nursing staff about  
19 Steven?  
20 MR. BEMIS: I object to form. Calls  
21 for speculation. Answer, if you know.  
22 THE WITNESS: I don't know.  
23 BY MR. MURDOCK:  
24 Q. In other words, did they know?  
25 A. I don't know.

Page 39

1 Q. I mean if everybody was talking about it,  
2 would you assume they knew?  
3 MR. BEMIS: Calls for speculation.  
4 THE WITNESS: I don't know what they  
5 knew.  
6 BY MR. MURDOCK:  
7 Q. Okay. In other words, I'd have to ask  
8 them, right?  
9 A. Uh-huh.  
10 Q. Is that a yes?  
11 A. Yes.  
12 Q. Okay. You didn't have any specific  
13 conversations with Amy or Danielle that you recall,  
14 correct?  
15 A. Correct.  
16 Q. You did have specific conversations with  
17 Ray though, correct?  
18 A. Yes.  
19 Q. And that would have been before the  
20 incident with Denise Hanna, correct?  
21 A. Yes.  
22 Q. Now, after the incident with Denise Hanna,  
23 you worked at Centennial for about another year or  
24 so. Would that be right?  
25 A. Sounds about right.

Page 40

1 Q. And my understanding is that at some point,  
2 I want to say -- I could be wrong, but in the summer  
3 of 2009, you were terminated by Centennial, is that  
4 correct?  
5 A. Yes.  
6 Q. In between the time you were terminated and  
7 the Denise Hanna incident, do you recall having any  
8 conversations with anybody at Centennial Hills  
9 Hospital regarding Steven Farmer?  
10 MR. BEMIS: Besides what she already  
11 testified to?  
12 MR. MURDOCK: Yeah.  
13 THE WITNESS: Again, all the nursing  
14 staff was talking about it, following the case. So I  
15 may have. I don't remember any specific  
16 conversations with people, but it's possible.  
17 BY MR. MURDOCK:  
18 Q. Were you ever called in, for instance by  
19 risk management, to discuss what you had witnessed  
20 with Mr. Farmer?  
21 A. No.  
22 Q. Did any lawyers ever speak with you  
23 regarding Mr. Farmer?  
24 A. No.  
25 Q. When was the first time a lawyer ever spoke

Page 41

1 with you regarding Mr. Farmer?  
2 A. When I was subpoenaed for his criminal  
3 trial.  
4 Q. And before then no lawyers, like for  
5 instance Mr. Bemis -- he never called you?  
6 A. No.  
7 Q. And nobody from risk management had called  
8 you?  
9 A. No.  
10 Q. Now, your discussion with Amy Bochenek --  
11 that was after the Denise Hanna incident, correct?  
12 A. Yes.  
13 Q. And you said that occurred that day of the  
14 Denise Hanna incident, correct?  
15 A. Correct.  
16 Q. After that day, speaking with Amy Bochenek,  
17 did you speak with anybody else regarding Mr. Farmer,  
18 in terms of administrators or administration at  
19 Centennial Hills Hospital?  
20 A. Not that I can recall.  
21 Q. Okay. When you spoke with Amy Bochenek,  
22 did you tell her that the nursing staff had all been  
23 talking about Steven Farmer?  
24 A. I don't recall.  
25 Q. Is that something that you believe that

Page 42

1 it's more likely than not that you did?  
2 A. I can't recall. I can't answer that.  
3 Q. When Mr. Farmer was arrested, that didn't  
4 come as a complete shock or surprise to you, did it?  
5 A. No.  
6 MS. HALL: Objection. Lack of  
7 foundation.  
8 BY MR. MURDOCK:  
9 Q. And it didn't come as a complete shock or  
10 surprise because you already basically had these  
11 suspicions, correct?  
12 MR. BEMIS: I object to form.  
13 BY MR. MURDOCK:  
14 Q. You can go ahead.  
15 A. Correct.  
16 Q. And these are the suspicions that you had  
17 voiced to Ray and others, correct?  
18 MR. BEMIS: Same objection.  
19 THE WITNESS: Correct.  
20 BY MR. MURDOCK:  
21 Q. Now, do you remember Kim's last name?  
22 MR. SILVESTRI: Who?  
23 MS. HALL: Kim.  
24 THE WITNESS: No, I don't. I'm sorry.  
25

Page 43

1 BY MR. MURDOCK:  
2 Q. Do you remember, was she an ER nurse?  
3 A. Yes.  
4 Q. When you said the nursing staff all knew,  
5 was that the nursing staff down at the ER?  
6 A. Yes.  
7 Q. Because that's basically who you had  
8 contact with, correct?  
9 A. Correct.  
10 Q. And that was the nursing staff on your  
11 shift?  
12 A. Correct.  
13 Q. So in other words, it wouldn't be up in the  
14 med-surg units, right?  
15 A. No.  
16 Q. That would just be down in the ER?  
17 A. Correct.  
18 Q. Had you ever heard about an incident  
19 whereby Mr. Farmer was thrown out of a room of a  
20 female patient in the med-surg unit, when he was  
21 acting as a sitter for an elderly woman?  
22 A. No.  
23 Q. Had you ever heard that there were screams  
24 coming from the room, and the nursing staff there  
25 didn't lend any credence to what she was alleging?

Page 44

1 MR. BEMIS: I object to form.  
2 MS. HALL: Lacks foundation.  
3 THE WITNESS: No.  
4 BY MR. MURDOCK:  
5 Q. Do you know a Nurse Murray -- Christine  
6 Murray? Does that name sound familiar at all?  
7 A. No.  
8 MR. MURDOCK: Let's mark this.  
9 (Plaintiff's Exhibit 1 marked.)  
10 BY MR. MURDOCK:  
11 Q. Showing you what's been marked as  
12 Plaintiff's Exhibit 1 --  
13 MR. MURDOCK: It's the statement of  
14 Margaret Wolfe. I figured you should have it.  
15 BY MR. MURDOCK:  
16 Q. Ms. Wolfe, I'm showing you what's been  
17 marked as Plaintiff's Exhibit 1.  
18 This is the transcript of your  
19 statement, is that correct?  
20 A. Yes.  
21 Q. And you said you had seen this before,  
22 correct?  
23 A. Yes.  
24 Q. When was the last time you saw this?  
25 A. Yesterday.

Page 45

1 Q. Prior to yesterday -- and by the way, that  
2 was in your meeting with Mr. Bemis?  
3 A. Yes.  
4 Q. Prior to yesterday, when was the last time  
5 you had seen it?  
6 A. Probably when I testified at the criminal  
7 trial.  
8 Q. And prior to then, do you recall seeing it?  
9 A. No, I do not.  
10 Q. Have you ever listened to the transcript  
11 itself?  
12 A. No.  
13 Q. Was it recorded?  
14 A. Yes.  
15 Q. In fact that's what the transcript comes  
16 from, right?  
17 A. Yes.  
18 Q. Where did this interview take place?  
19 A. At an Einstein bagel shop right near the  
20 Centennial Hospital.  
21 Q. Do you know how Detective Saunders got your  
22 name?  
23 A. Yes. I contacted him.  
24 Q. And why did you contact him?  
25 A. Because I was disturbed over the incident

Page 46

1 that I saw with Ms. Hanna and wanted it to be brought  
2 to his attention.  
3 Q. Because they had put out like a  
4 community-wide thing about the assault, is that  
5 correct? Were you aware of that?  
6 A. Yes.  
7 Q. And had you seen that?  
8 A. No.  
9 Q. But you knew Farmer was arrested?  
10 A. Yes.  
11 Q. And you wanted to let them know that there  
12 were other issues potentially, correct?  
13 A. Yes.  
14 Q. Do you recall what time approximately the  
15 Denise Hanna incident was?  
16 A. It was in the early morning hours.  
17 Q. Okay.  
18 A. Possibly around 3:00 a.m. I'm not saying  
19 that to be exact, but early morning hours.  
20 Q. Was Marcia Petersen your nurse? Do you  
21 remember Marcia Petersen?  
22 A. I don't know that name.  
23 Q. Okay. Was Ms. Cagnina your nurse?  
24 A. My nurse?  
25 Q. I'm sorry. Did I say that the last time,

Page 47

1 too?  
2 A. Yes.  
3 Q. Let me start over.  
4 Were you Marcia Petersen's nurse?  
5 A. No.  
6 Q. You don't even know that name, do you?  
7 A. No.  
8 Q. Were you Ms. Cagnina's nurse?  
9 A. No.  
10 Q. Do you know who Ms. Cagnina is?  
11 A. No.  
12 Q. You were Denise Hanna's nurse?  
13 A. Yes.  
14 Q. When this incident occurred with Ms. Hanna,  
15 how come you didn't go speak with Ms. Hanna?  
16 A. I didn't want to alert her to something  
17 that she may have perceived differently.  
18 I did go into the room, and there  
19 was what I perceived as eye contact between her and  
20 I, knowing that something had just happened that  
21 shouldn't have. But she did not say anything to me  
22 about it, and I didn't want to raise concerns to her  
23 if it was not an issue to her.  
24 Q. But you did go speak to Ray about it?  
25 A. Yes.

Page 48

1 Q. Okay. Take a look at Plaintiff's Exhibit  
2 1. The time you gave the statement was about 7:58 in  
3 the morning on May 30th, correct?  
4 A. Correct.  
5 Q. Do you know why it was done so early?  
6 A. It was after I got off my shift.  
7 Q. Okay. I need to ask you a personal  
8 question.  
9 A. Yes.  
10 Q. And I promise you, this will probably be  
11 the only personal question I will ever ask you.  
12 Have you ever been sexually  
13 assaulted?  
14 A. Yes.  
15 Q. Was it before this incident?  
16 A. Many years.  
17 Q. Okay. If you turn to page 2, the detective  
18 asked you, "What do you do for Centennial Hills  
19 Hospital?" And your answer was, "I'm an ER nurse."  
20 Do you see that?  
21 A. Yes.  
22 Q. Was that the truth?  
23 A. Yes.  
24 Q. You didn't lie to the cops when you told  
25 them that, right?

Page 49

1 A. No.  
2 Q. Okay. And then as you go down the line it  
3 says, "And what was Steven Farmer's job?" Your  
4 answer was, "He was a CNA contracted out through an  
5 agency."  
6 Did you lie to the police there?  
7 A. No.  
8 Q. How did you know he was contracted out  
9 through an agency?  
10 A. It was just common knowledge with us there  
11 that he was an agency CNA, and not a staff CNA.  
12 I don't know how that information  
13 got relayed. We know in the hospital which employees  
14 are agency and which employees are staff.  
15 Q. Agency people back then at Centennial Hills  
16 Hospital -- did they have separate badges?  
17 A. Yes.  
18 Q. Is that how you figured out he was an  
19 agency nurse?  
20 A. Possibly.  
21 Q. But even that separate badge said  
22 "Centennial Hills Hospital" on it, correct?  
23 MR. BEMIS: I object to form.  
24 THE WITNESS: Correct.  
25

Page 50

1 BY MR. MURDOCK:  
2 Q. Was it the night of the 14th going into the  
3 day of the 15th that the incident with Ms. Hanna  
4 occurred?  
5 A. Yes, the early morning of the 15th.  
6 Q. Okay. If you would turn to page 8 in the  
7 Voluntary Statement, there's a question in the middle  
8 of the page. It starts with, "Did a -- excuse me."  
9 It states, "Um, has uh, anybody  
10 else in the ER room that you've worked with, ever  
11 come to you, or have you ever talked to anybody that  
12 shared similar concerns that you do about  
13 Mr. Farmer?"  
14 And your answer was, "Um, the same  
15 nurse, Ray Sumera, had told me another time that  
16 he -- to watch him around my female patients."  
17 Do you see that?  
18 A. Yes.  
19 Q. Did you lie to the police when you said  
20 that?  
21 A. No.  
22 Q. Were you being honest and truthful?  
23 A. Yes.  
24 Q. Tell me what Ray told you.  
25 A. That's basically all he told me. There was

Page 51

1 not much more to that conversation.  
2 Q. Well, apparently Ray told you that you  
3 should watch him around your female patients. Is  
4 that correct?  
5 A. Yes.  
6 Q. Did Ray say anything else about that? In  
7 other words, did he say he was being overly  
8 attentive, the same things you've already told us?  
9 A. I don't recall the specifics of anything  
10 else he said. Just that he did tell me that.  
11 Q. Okay. And that was at some point in time  
12 several weeks prior to the Denise Hanna situation,  
13 correct?  
14 A. Yes.  
15 Q. Okay. And that's when he told you, at the  
16 very least, to watch Mr. Farmer being around your  
17 female patients, correct?  
18 A. Yes.  
19 Q. And that was something specifically that  
20 Mr. Sumera told you, correct?  
21 A. Yes.  
22 Q. And as you go down, here's what he said --  
23 and maybe this will refresh your recollection.  
24 He states, "That he was concerned  
25 because he" -- meaning Mr. Farmer -- "was very overly

Page 52

1 attentive with female patients, and very anxious to  
2 connect them to the monitors and disconnect them from  
3 the monitors, which would require him" -- meaning  
4 Mr. Farmer -- "to reach into their clothing."  
5 Do you see that?  
6 A. Yes.  
7 Q. Does that refresh your recollection?  
8 A. Yes.  
9 Q. Okay. So let's talk about that for a  
10 second.  
11 So at some point several weeks  
12 prior to the Denise Hanna situation, Mr. Sumera came  
13 to you and told you to watch Mr. Farmer around your  
14 female patients, correct?  
15 A. Correct.  
16 Q. And he told you that he was concerned  
17 because Mr. Farmer was overly attentive with female  
18 patients, correct?  
19 A. Yes.  
20 Q. And he told you that Mr. Farmer was very  
21 anxious to connect them to the monitors, correct?  
22 A. Yes.  
23 Q. And when you say "connect them to the  
24 monitors," was that the heart monitors that we talked  
25 about before?

Page 53	Page 55
<p>1 A. Yes.</p> <p>2 Q. The 5 leads?</p> <p>3 A. Correct.</p> <p>4 Q. And also disconnect them from the monitors?</p> <p>5 A. Yes.</p> <p>6 Q. And that's the same heart monitors, the 5</p> <p>7 leads, correct?</p> <p>8 A. Correct.</p> <p>9 Q. And of course that would require him to</p> <p>10 reach into their clothing, correct?</p> <p>11 A. Yes.</p> <p>12 Q. Do you remember Julie's last name?</p> <p>13 A. No, I don't.</p> <p>14 Q. Okay. If you turn to page 9, the detective</p> <p>15 asks you basically if there's anything that he might</p> <p>16 have forgotten to ask about Mr. Farmer, and you state</p> <p>17 in the middle of the page about Farmer, "He was just</p> <p>18 very suspicious in his activities. Um, such as going</p> <p>19 into rooms with doors closed with female patients,</p> <p>20 when he was not asked to." Correct?</p> <p>21 A. Correct.</p> <p>22 Q. You didn't lie to the police when you told</p> <p>23 them that, correct?</p> <p>24 A. No.</p> <p>25 Q. And by the way, going back to page 8 for a</p>	<p>1 A. No.</p> <p>2 Q. You were being honest and truthful,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. You said something on page 11 I'd like to</p> <p>6 ask you a few questions about.</p> <p>7 There's a question towards the</p> <p>8 middle of the page -- towards the bottom, I guess.</p> <p>9 It says, "Okay. Okay." Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. It says, "Do you harbor any -- do you have</p> <p>12 any personal gain by coming forward to me with this</p> <p>13 information?"</p> <p>14 That's the detective asking,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. And you answered, "No, I don't. In fact,</p> <p>18 I" -- something -- "fear that I could possibly get in</p> <p>19 trouble with my job if I were to give out</p> <p>20 information, you know, regarding or against" --</p> <p>21 blank -- "with my patients."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. I don't know what the blanks say. Do you</p> <p>25 know what the blanks say, or do you recall what you</p>
Page 54	Page 56
<p>1 second, to that long sentence in the middle of the</p> <p>2 page -- when you told the police that Ray Sumera had</p> <p>3 told you that you should watch your female patients</p> <p>4 around Farmer, because Ray was concerned that Farmer</p> <p>5 was very overly attentive with female patients and</p> <p>6 very anxious to connect them to the monitors and</p> <p>7 disconnect them from the monitors -- when you told</p> <p>8 the police that, you didn't lie to the police,</p> <p>9 correct?</p> <p>10 A. Correct.</p> <p>11 Q. You were being and honest and truthful with</p> <p>12 the police, correct?</p> <p>13 A. Yes.</p> <p>14 Q. If you turn to page 10, in the middle of</p> <p>15 the page the detective asks you, "If you had to give</p> <p>16 me an estimate, how many times would you say that</p> <p>17 you've seen him walk into female patients' rooms</p> <p>18 where the door is closed, but there's no need for him</p> <p>19 to be in that room?" Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And your answer was, "Multiple times. I</p> <p>22 couldn't put a number on it." Is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. You weren't lying to the police when you</p> <p>25 said that, correct?</p>	<p>1 were telling the police?</p> <p>2 A. I would probably have been referring to</p> <p>3 HIPAA information.</p> <p>4 Q. Because you spoke with the police?</p> <p>5 A. Yes.</p> <p>6 Q. So you were concerned about HIPAA about</p> <p>7 going to the police, correct?</p> <p>8 A. Not necessarily the police. I was</p> <p>9 concerned just about violating HIPAA laws by speaking</p> <p>10 with anybody about my patient.</p> <p>11 Q. Okay. Prior to going to the police, did</p> <p>12 you ask anybody if you could go to the police, or</p> <p>13 would you be violating HIPAA?</p> <p>14 A. No, I did not.</p> <p>15 Q. Why didn't you?</p> <p>16 A. Well, I did feel it was safe to speak with</p> <p>17 the police, and I wasn't giving specific information</p> <p>18 on her medical condition or things like that.</p> <p>19 Q. Right. You were giving specific</p> <p>20 information regarding a crime that you believe had</p> <p>21 been committed, correct?</p> <p>22 MR. BEMIS: I object to form.</p> <p>23 THE WITNESS: Right.</p> <p>24 BY MR. MURDOCK:</p> <p>25 Q. Now, then the detective, as you go along on</p>

Page 57

1 page 11, starts talking about other people that you  
2 had discussed this with prior to the Denise Hanna  
3 situation several weeks before, and you talk about  
4 Julie specifically. Correct?  
5 A. Yes.  
6 Q. And -- oh, no, actually you don't. Because  
7 Julie didn't work the nightshift with you, right?  
8 A. Correct.  
9 Q. Okay. In fact I'm reading that wrong here.  
10 He asked you about Julie. You  
11 didn't tell him about Julie, right?  
12 A. (No response.)  
13 Q. If you look at the question, it says,  
14 "Okay, and that would be Ray Sumera. Did Julie say  
15 she had any concerns?" Do you see that?  
16 A. Yes.  
17 Q. And you said, "Julie hasn't worked with  
18 him, because she works on dayshift." Do you see  
19 that?  
20 A. Yes.  
21 Q. And you were being honest and truthful  
22 there, right?  
23 A. Yes.  
24 Q. But then as you go along, you were trying  
25 to think up I guess people's names for the detective,

Page 58

1 correct?  
2 A. Yes.  
3 Q. And then you state -- it's on the top of  
4 page 13.  
5 You state, "There's one other  
6 nurse that had come to me, that I'm trying to  
7 remember her name, that had told me some of the same  
8 things."  
9 And then you asked him to turn off  
10 the recorder for one second so you could think about  
11 it, right?  
12 A. Yes.  
13 Q. Were you nervous with the recorder being  
14 on?  
15 A. I was just nervous in general. Not so much  
16 with the recorder, but yes, I was nervous.  
17 Q. So you just couldn't think of certain  
18 things real fast, right?  
19 A. Right.  
20 Q. But then it came to you, like it does, and  
21 you came up with Kim, right?  
22 A. Yes.  
23 Q. And you state down towards the middle of  
24 the page -- the detective asks you, "And she" --  
25 meaning Kim -- "relayed some concern to you also?"

Page 59

1 And you stated, "The same concerns that Ray had said  
2 about his actions" -- meaning Farmer's -- "were  
3 suspicious, especially with a female patient."  
4 Correct?  
5 A. Yes.  
6 Q. So she had come to you, correct?  
7 A. Yes.  
8 Q. She relayed the concern to you, and I guess  
9 you discussed it with her, correct?  
10 A. Yes.  
11 Q. And you were being truthful when you said  
12 that to the police?  
13 A. Yes.  
14 Q. You weren't lying to the police?  
15 A. No.  
16 Q. I want you to take a few minutes here. I  
17 know you've looked at this before, but I want you to  
18 take a few minutes. I want you to read through your  
19 entire transcript.  
20 A. Okay.  
21 Q. And I want you to tell me if there's  
22 anything -- anything at all in the transcript that  
23 you believe is wrong.  
24 A. Okay.  
25 Q. In other words, that there's a mistake, or

Page 60

1 something like that. Okay?  
2 A. Okay.  
3 Q. So take your time, and if you want I'll  
4 give you a pen and -- well, actually just bend the  
5 page. Okay?  
6 A. Okay.  
7 Q. Take your time.  
8 MR. MURDOCK: We can go off the record.  
9 (Recess.)  
10 BY MR. MURDOCK:  
11 Q. Ms. Wolfe, you have now had an opportunity  
12 to review your voluntary statement in full, is that  
13 correct?  
14 A. Yes.  
15 Q. Is there anything at all in the voluntary  
16 statement that you believe is wrong?  
17 A. No, but there was a contradiction to  
18 something that was said earlier regarding the  
19 dates --  
20 Q. Oh, okay.  
21 A. -- of when it happened.  
22 Q. Tell me about that.  
23 A. You had said the 14th to the 15th, and it  
24 was actually the 15th to the 16th.  
25 Q. Okay. Is that something you specifically

<p>Page 61</p> <p>1 remember, or is it something that --</p> <p>2 A. Something I read in here.</p> <p>3 Q. Something you read in here?</p> <p>4 A. Yeah.</p> <p>5 Q. So in here it says the 15th to the 16th?</p> <p>6 A. Yes.</p> <p>7 Q. But it in actually it was the 14th to the</p> <p>8 15th?</p> <p>9 MR. BEMIS: I object to form. It</p> <p>10 misstates her testimony.</p> <p>11 BY MR. MURDOCK:</p> <p>12 Q. I'm trying to figure it out. I'm not</p> <p>13 trying to --</p> <p>14 A. No, I believe the dates in here are</p> <p>15 correct, the 15th and 16th.</p> <p>16 Q. Okay.</p> <p>17 MS. HALL: I believe she said one of</p> <p>18 your questions said the 14th and 15th.</p> <p>19 MR. MURDOCK: Oh, okay. So my question</p> <p>20 was wrong.</p> <p>21 BY MR. MURDOCK:</p> <p>22 Q. But anything in the statement itself,</p> <p>23 outside of my question?</p> <p>24 MR. SILVESTRI: So that would mean it</p> <p>25 would be 3:00 a.m., or thereabouts, on the 16th?</p>	<p>Page 63</p> <p>1 BY MR. MURDOCK:</p> <p>2 Q. What does it mean to you?</p> <p>3 MR. MURDOCK: Not to you, John.</p> <p>4 THE WITNESS: I take it very seriously.</p> <p>5 That the information I give needs to be true and</p> <p>6 correct, to the best of my knowledge, and that I'm</p> <p>7 not to lie about anything.</p> <p>8 BY MR. MURDOCK:</p> <p>9 Q. Okay. When you gave the statement to the</p> <p>10 police, even though you weren't put under oath, is</p> <p>11 that the same standard you held yourself to?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 MR. MURDOCK: I have nothing further at</p> <p>15 this time.</p> <p>16 However, for the record, no matter</p> <p>17 what happens to the rest of this deposition, I'm not</p> <p>18 closing this deposition.</p> <p>19 Because just for the record, I</p> <p>20 don't believe that Mr. Bemis can act as your counsel</p> <p>21 in this matter. I believe he's got a hell of a</p> <p>22 conflict of interest at this point in this case.</p> <p>23 Whether or not he continues as counsel in the entire</p> <p>24 case is up for discussion.</p> <p>25 That being said, if need be we'll</p>
<p>Page 62</p> <p>1 THE WITNESS: Correct.</p> <p>2 MR. MURDOCK: Okay.</p> <p>3 MR. SILVESTRI: Thank you.</p> <p>4 BY MR. MURDOCK:</p> <p>5 Q. So outside of my question being wrong, is</p> <p>6 there anything wrong in the statement itself,</p> <p>7 Plaintiff's Exhibit 1?</p> <p>8 A. No.</p> <p>9 Q. Is there anything in Plaintiff's Exhibit 1</p> <p>10 that you lied about?</p> <p>11 A. No.</p> <p>12 Q. Is there anything in Plaintiff's Exhibit 1</p> <p>13 you weren't being honest and truthful about with the</p> <p>14 police?</p> <p>15 A. No.</p> <p>16 Q. Okay. This morning before the deposition</p> <p>17 was started -- right when the deposition was started</p> <p>18 actually, you gave an oath.</p> <p>19 A. Yes.</p> <p>20 Q. And you gave an oath to tell the truth, is</p> <p>21 that correct?</p> <p>22 A. Yes.</p> <p>23 Q. What does that oath mean to you?</p> <p>24 MR. BEMIS: I object to form. Calls</p> <p>25 for a legal conclusion. You can answer.</p>	<p>Page 64</p> <p>1 have to get a court order, and potentially, if</p> <p>2 allowed, come back and ask you questions about your</p> <p>3 conversations with Mr. Bemis.</p> <p>4 But that being said, I'll leave it</p> <p>5 to Mr. Silvestri.</p> <p>6</p> <p>7 EXAMINATION</p> <p>8 BY MR. SILVESTRI:</p> <p>9 Q. Ms. Wolfe, my name is Jim Silvestri. I</p> <p>10 represent American Nursing Services.</p> <p>11 Why were you terminated from</p> <p>12 Centennial Hills?</p> <p>13 A. I had brought my daughter into work with me</p> <p>14 one night. I knew it was very busy that time of</p> <p>15 year, and I didn't want to call off and leave them in</p> <p>16 a bad situation.</p> <p>17 We had rooms in the back that were</p> <p>18 not being used, and she was -- you know, old enough</p> <p>19 that she didn't have to be watched continually.</p> <p>20 I just put her in one of those</p> <p>21 rooms to keep an eye on her throughout the night,</p> <p>22 instead of leaving her home alone.</p> <p>23 And she started getting sicker</p> <p>24 throughout the night. One of the doctors had</p> <p>25 suggested giving her a bag of fluid.</p>

Page 65

1 And she was not checked in as a  
2 patient, but we started an IV on her and gave her  
3 some fluids. And I was terminated for that.  
4 Q. Okay. And that was some breach of policy  
5 of the hospital?  
6 A. Yes.  
7 Q. And how long ago was that?  
8 A. About six years ago.  
9 Q. Now, most people would say that  
10 terminations are not pleasant; it can create bad  
11 feelings.  
12 Are you testifying here today with  
13 any animosity or bad feeling toward Centennial Hills  
14 Hospital?  
15 A. No. I know that I made a poor decision in  
16 that situation, and I don't hold the hospital  
17 responsible in any way.  
18 Q. All right. And it's true that the  
19 statement that we've seen in Exhibit 1 was given  
20 approximately a year before that event even occurred.  
21 Is that true?  
22 A. Yes.  
23 Q. Okay. I just want to go over some of these  
24 names, in case we can identify some different  
25 witnesses.

Page 66

1 You testified that several nurses  
2 had expressed or knew about similar concerns or  
3 suspicions that you had about Mr. Farmer, and I think  
4 the testimony was even these communications or  
5 statements were made weeks before the Hanna incident.  
6 Is that correct?  
7 A. Yes.  
8 Q. I don't want to misquote your testimony.  
9 Do you know Darby Curley?  
10 A. Yes.  
11 Q. And who is Darby?  
12 A. He was one of the charge nurses.  
13 Q. Shannon Brelig?  
14 A. Yes. She was one of the charge nurses.  
15 Q. Sherry Chipolene?  
16 A. I believe she was a relief charge.  
17 Q. Yvonne Fernandez?  
18 A. I do not remember her.  
19 Q. Jessica Brack?  
20 A. I don't recall her.  
21 Q. Ed Tenayo?  
22 A. I vaguely remember him.  
23 Q. Karen Evanson?  
24 A. Yes.  
25 Q. You remember her?

Page 67

1 A. Yes.  
2 Q. Were these some of the nurses that you were  
3 talking about when you said that there were other  
4 nurses at Centennial Hills that had these same  
5 concerns or suspicions about Mr. Farmer?  
6 MR. BEMIS: I object to form.  
7 Misstates testimony. Go ahead and answer.  
8 THE WITNESS: I don't recall speaking  
9 with any of those people in specific about it. Most  
10 likely I did not talk with those particular people.  
11 BY MR. SILVESTRI:  
12 Q. Is Kim's last name Davis?  
13 A. Yes, that sounds right.  
14 Q. That's the Kim that you spoke about  
15 earlier?  
16 A. Yes.  
17 Q. Do you recall Julie's last name?  
18 A. No, I don't.  
19 Q. Could it be Montero?  
20 A. I don't know.  
21 Q. How about Amy? Is there an Amy?  
22 A. There were two Amys there. The manager,  
23 Amy Bochenek; and then another Amy, who was a charge  
24 nurse. I don't recall her last name.  
25 Q. Is that Amy Agosto?

Page 68

1 A. Yes.  
2 Q. Did you ever speak to Amy Agosto about  
3 Mr. Farmer?  
4 A. No.  
5 Q. Did she speak to you about him?  
6 A. No.  
7 Q. Were there any nurses on your shift in or  
8 around May -- well, I'll take that back -- January  
9 2008 through May 2008, that you considered yourself  
10 closer to than other nurses?  
11 A. Yes.  
12 Q. And who would those be?  
13 A. Gina.  
14 Q. Was her name anything other than Gina? Do  
15 you recall if that was a nickname?  
16 A. No. To my knowledge, that's what she goes  
17 by.  
18 Q. Okay. Anybody else that you were closer  
19 to?  
20 A. Ray.  
21 Q. And that's Ray Sumera?  
22 A. Yes.  
23 Q. Anybody else?  
24 A. Karen Goodheart.  
25 Q. Was Karen an ER nurse?



<p style="text-align: right;">Page 69</p> <p>1 A. Yes.</p> <p>2 Q. Anybody else?</p> <p>3 A. Karen Evanston.</p> <p>4 Q. Anybody else?</p> <p>5 A. That's all that I can recall right now.</p> <p>6 Q. What are your outside activities? Do you</p> <p>7 belong to any groups or organizations?</p> <p>8 A. I was very active in my church for awhile.</p> <p>9 Not so much right now, but I was very active.</p> <p>10 Q. Which church is that?</p> <p>11 A. The LDS Church, Mormon.</p> <p>12 Q. Were you active with any children or youth</p> <p>13 groups at that church?</p> <p>14 A. Yes.</p> <p>15 Q. And I'm not in the LDS Church, but in my</p> <p>16 church I'm involved in some youth groups and we go</p> <p>17 through some youth training -- youth protection</p> <p>18 training.</p> <p>19 Are you familiar with any type of</p> <p>20 youth protection training?</p> <p>21 A. I am, but I have not had any.</p> <p>22 Q. Have you had any youth protection training</p> <p>23 through any other group?</p> <p>24 A. No.</p> <p>25 Q. A lot of the questions that you were asked</p>	<p style="text-align: right;">Page 71</p> <p>1 you know if that alarm registers anywhere, other than</p> <p>2 on the little machine where the leads are attached</p> <p>3 to?</p> <p>4 MR. BEMIS: Incomplete hypothetical.</p> <p>5 Are you talking about in the ER specifically?</p> <p>6 MR. SILVESTRI: Let's start there, with</p> <p>7 the ER.</p> <p>8 BY MR. SILVESTRI:</p> <p>9 Q. Do you know if that's registered anywhere,</p> <p>10 like in a patient's chart, or at the nurses' station?</p> <p>11 A. At the nurses' station there's usually a</p> <p>12 central monitor. Not always.</p> <p>13 Q. Well, sometimes the alarm might be going</p> <p>14 off in a patient's room, and if somebody is not right</p> <p>15 there they're not going to fix it right away.</p> <p>16 And that's why I want to know, is</p> <p>17 that alarm registered anywhere else in the ER?</p> <p>18 MR. BEMIS: Same objection.</p> <p>19 THE WITNESS: The alarm itself?</p> <p>20 BY MR. SILVESTRI:</p> <p>21 Q. Yeah.</p> <p>22 A. No.</p> <p>23 Q. Is there some other notification though</p> <p>24 that the nurses' station would get that a lead was</p> <p>25 not attached properly, or was somehow improperly</p>
<p style="text-align: right;">Page 70</p> <p>1 about whether it's appropriate or not for a male</p> <p>2 nurse or a male CNA to be in a room of a female</p> <p>3 patient alone -- a lot of those questions sometimes</p> <p>4 spoke about the door being closed and the door not</p> <p>5 being closed.</p> <p>6 A. Yes.</p> <p>7 Q. I've got a couple questions to ask you</p> <p>8 about that.</p> <p>9 Is it appropriate for a male nurse</p> <p>10 or a male CNA to be alone with a female patient with</p> <p>11 the curtain closed?</p> <p>12 MR. BEMIS: I object to form.</p> <p>13 Incomplete hypothetical. Answer, if you know.</p> <p>14 THE WITNESS: It would be similar to</p> <p>15 the door being closed.</p> <p>16 BY MR. SILVESTRI:</p> <p>17 Q. And is it my understanding that at the ER</p> <p>18 at Centennial Hills in or around January through May</p> <p>19 of 2008 -- at least in those dates, some of the rooms</p> <p>20 had doors, and some had just curtains. Is that fair?</p> <p>21 A. Yes.</p> <p>22 Q. If an alarm goes on because a lead is</p> <p>23 detached or is not working properly, with respect to</p> <p>24 a patient that has, as you talked about, a 5-lead</p> <p>25 monitor on a patient, and that alarm goes off -- do</p>	<p style="text-align: right;">Page 72</p> <p>1 working?</p> <p>2 A. The alarm doesn't necessarily mean that a</p> <p>3 lead is not attached properly. It just means there's</p> <p>4 an arrhythmia that needs to be addressed, which could</p> <p>5 be caused from a lead not being attached properly.</p> <p>6 Q. Okay.</p> <p>7 A. The alarms are very loud, so you would hear</p> <p>8 it outside of the room.</p> <p>9 Q. Is there any other mechanism though that</p> <p>10 registers that problem or that issue?</p> <p>11 A. Sometimes there's central monitors, that an</p> <p>12 alarm would go off on that central monitor at the</p> <p>13 nurses' station as well.</p> <p>14 Q. Do you know if that central alarm goes off</p> <p>15 if it's registered in a patient's chart?</p> <p>16 A. Occasionally the monitor will print out a</p> <p>17 strip of what the rhythm is, and that could be placed</p> <p>18 into the patient's chart.</p> <p>19 Q. And it would print out this arrhythmia?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know if it's the same system up on</p> <p>22 the 6th floor of Centennial Hills Hospital?</p> <p>23 A. I do not know.</p> <p>24 MR. BEMIS: Objection. Foundation.</p> <p>25</p>

Page 73

1 BY MR. SILVESTRI:  
2 Q. Do you know where Kim Davis is today?  
3 A. No, I don't.  
4 Q. You also mentioned Gina. Do you know where  
5 Gina is today, where she works?  
6 A. The last I knew she was working at UMC. I  
7 don't know if she's still there.  
8 Q. Do you know what department?  
9 A. I believe med-surg.  
10 Q. Then you mentioned Karen Evanson. Do you  
11 know where she is?  
12 A. No, I don't.  
13 Q. Then there was one other person. I think  
14 it was another Karen.  
15 A. Karen Goodheart.  
16 Q. Do you know where Karen Goodheart is?  
17 A. I don't. I know they're still in Las  
18 Vegas, but I don't know where they're working.  
19 Q. I'm sorry if I've asked this before.  
20 Did you ever communicate with the  
21 agencies, or any agency nurse or agency CNA, while  
22 you worked at Centennial Hills Hospital?  
23 A. No.  
24 Q. And the Julie that we spoke of in your  
25 statement, do you know where she is today?

Page 74

1 A. No, I don't.  
2 Q. Do you know if she's still in Las Vegas?  
3 A. I do not know.  
4 Q. Do you know the last place that you were  
5 aware of where she worked?  
6 A. Centennial Hills.  
7 MR. SILVESTRI: Thank you, Ms. Wolfe.  
8 MS. BROOKHYSER: I have no questions.  
9 MS. HALL: Just a couple.  
10  
11 EXAMINATION  
12 BY MS. HALL:  
13 Q. I just want to get some context on a couple  
14 of things that you testified to earlier.  
15 Earlier when Mr. Murdock was  
16 questioning you, you mentioned that -- I think your  
17 testimony was that among the nurses it was kind of  
18 well-known, these suspicions or concerns about Steven  
19 Farmer, correct?  
20 A. Yes.  
21 Q. Were you talking about before May 16, 2008?  
22 A. Yes.  
23 Q. Do you know if before May 16, 2008 there  
24 was ever any sort of internal investigation at  
25 Centennial related to Steven Farmer?

Page 75

1 MR. BEMIS: Objection.  
2 THE WITNESS: Not to my knowledge.  
3 BY MS. HALL:  
4 Q. You certainly weren't ever contacted by  
5 anyone at Centennial and asked to give any sort of  
6 statement about Steven related to an internal  
7 investigation, true?  
8 A. True.  
9 MS. HALL: Thank you. That's all I  
10 have.  
11  
12 FURTHER EXAMINATION  
13 BY MR. MURDOCK:  
14 Q. Had you been asked by Centennial about  
15 Steven Farmer prior to Denise Hanna, that situation,  
16 what would you have told them?  
17 A. Exactly what I've told you here. That he  
18 made me uncomfortable and I did not want him around  
19 my female patients.  
20 Q. Because he was overly attentive?  
21 A. Yes.  
22 Q. And you were suspicious?  
23 A. Yes.  
24 MR. MURDOCK: Thank you. I have  
25 nothing further at this time.

Page 76

1 MR. SILVESTRI: Oh, I just have one  
2 other question.  
3  
4 FURTHER EXAMINATION  
5 BY MR. SILVESTRI:  
6 Q. You mentioned you went to Ray Sumera, as he  
7 was a relief charge nurse. He was also a male.  
8 Typically at your work, if you're  
9 on your shift and you have any issues, is the charge  
10 nurse the first person you would go to?  
11 A. Yes.  
12 MR. SILVESTRI: That's all I've got.  
13 Thank you.  
14 MR. MURDOCK: You have an opportunity  
15 to read and sign, if you so desire. I know John will  
16 tell you to read and sign, so --  
17 MR. BEMIS: We'll read and sign.  
18 MR. MURDOCK: Very good.  
19  
20 (The deposition concluded at 11:03 a.m.)  
21  
22  
23  
24  
25

Page 77

1 REPORTER'S CERTIFICATE

2 STATE OF NEVADA )

3 ) ss.

4 COUNTY OF CLARK )

5 I, Carol O'Malley, Nevada Certified Court

6 Reporter 178, do hereby certify:

7 That I reported the taking of the deposition

8 of MARGARET WOLFE, RN on May 6, 2015 commencing at

9 the hour of 9:30 a.m.;

10 That prior to being examined, the witness was by

11 me duly sworn to testify to the truth, the whole

12 truth, and nothing but the truth;

13 That I thereafter transcribed my said

14 shorthand notes into typewriting and that the

15 typewritten transcription of said deposition is a

16 complete, true, and accurate transcription of my said

17 shorthand notes taken down at said time. Review of

18 the transcript was requested.

19 I further certify that I am not a relative or

20 employee of an attorney or counsel involved in said

21 action, nor financially interested in said action.

22 IN WITNESS WHEREOF, I have hereunto set my hand

23 in my office in the County of Clark, State of Nevada,

24 this 7th day of May, 2015.

25 *Carol O'Malley*  
Carol O'Malley, CCR No. 178

Page 78

1 DEPOSITION ERRATA SHEET

2

3 File No. 104099

4 Case Caption: Doe vs. Valley Health Systems

5

6

7

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I have

11 read the entire transcript of my deposition taken in

12 the captioned matter or the same has been read to me,

13 and the same is true and accurate, save and except

14 for changes and/or corrections, if any, as indicated

15 by me on the DEPOSITION ERRATA SHEET hereof, with the

16 understanding that I offer these changes as if still

17 under oath.

18

19 Signed this day of , 20 .

20

21

22 MARGARET WOLFE, RN

23

24

25

Page 79

1 DEPOSITION ERRATA SHEET

2 Page No. Line No. Change to:

3 Reason for change:

4 Page No. Line No. Change to:

5 Reason for change:

6 Page No. Line No. Change to:

7 Reason for change:

8 Page No. Line No. Change to:

9 Reason for change:

10 Page No. Line No. Change to:

11 Reason for change:

12 Page No. Line No. Change to:

13 Reason for change:

14 Page No. Line No. Change to:

15 Reason for change:

16 Page No. Line No. Change to:

17 Reason for change:

18 Page No. Line No. Change to:

19 Reason for change:

20 Page No. Line No. Change to:

21 Reason for change:

22

23

24 SIGNATURE: DATE:

25 MARGARET WOLFE, RN

Page 80

1 DEPOSITION ERRATA SHEET

2 Page No. Line No. Change to:

3 Reason for change:

4 Page No. Line No. Change to:

5 Reason for change:

6 Page No. Line No. Change to:

7 Reason for change:

8 Page No. Line No. Change to:

9 Reason for change:

10 Page No. Line No. Change to:

11 Reason for change:

12 Page No. Line No. Change to:

13 Reason for change:

14 Page No. Line No. Change to:

15 Reason for change:

16 Page No. Line No. Change to:

17 Reason for change:

18 Page No. Line No. Change to:

19 Reason for change:

20 Page No. Line No. Change to:

21 Reason for change:

22

23

24 SIGNATURE: DATE:

25 MARGARET WOLFE, RN

TAB 75

RSPN

MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

JOHN F. BEMIS, ESQ.

Nevada Bar No. 9509

HALL PRANGLE & SCHOONVELD, LLC

1160 North Town Center Drive, Suite 200

Las Vegas, NV 89144

702-889-6400 - Phone

702-384-6025 - Facsimile

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

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

*Attorneys for Defendants*

*Centennial Hills Hospital and*

*Universal Health Services, Inc.*

DISTRICT COURT

CLARK COUNTY, NEVADA

MISTY PETERSEN, 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'S  
RESPONSES TO PLAINTIFF'S ELEVENTH SET OF INTERROGATORIES**



COMES NOW, Defendant, VALLEY HEALTH SYSTEM, LLC, by and through their  
counsel of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, and hereby  
provides the following responses to Plaintiff's Eleventh Set of Interrogatories:

**INTERROGATORIES**

**INTERROGATORY NO. 18:**

Please state when you received the LVMPD Statement of Margaret Wolfe.

**RESPONSE NO. 18:**

Objection. This Interrogatory seeks information protected by the attorney-client  
privilege. Without waiving said Objection, this Answering Defendant has only learned of the  
LVMPD Statement of Margaret Wolfe through counsel.

**INTERROGATORY NO. 19:**

Please state when you first became aware that Margaret Wolfe had spoken with the  
LVMPD regarding Steven Farmer.

**RESPONSE NO. 19:**

See Response No. 18.

**INTERROGATORY NO. 20:**

Please identify who transported Jane Doe from the Emergency Room at Centennial Hills  
to her room on the 6<sup>th</sup> floor on May 13, 2008.

**RESPONSE NO. 20:**

Please see CHH00217-222, CHH00212, CHH00197-201.

**INTERROGATORY NO. 21:**

Please state exactly where Steven Farmer was assigned to be by Centennial Hills Hospital  
from May 13, 2008 through May 16, 2008.

1 **RESPONSE NO. 21:**

2 May 13, 2008 – Steven Farmer was not on schedule to work at Centennial Hills Hospital

3 May 14, 2008 – Steven Farmer was scheduled to be in the Emergency Department from  
4 7:00 pm – 7:00 am the following morning. At 2130, Mr. Farmer was floated to the 6<sup>th</sup> floor.

5 May 15, 2008 – Steven Farmer was scheduled in the Emergency Room at Centennial  
6 Hills Hospital from 7:00pm – 7:00 am the following morning.

7 May 16, 2008 – Steven Farmer was continuing his May 15, 2008, shift until 7:00 am.

8 **INTERROGATORY NO. 22:**

9 Please state the exact whereabouts of Steven Farmer at Centennial Hills Hospital from  
10 May 13, 2008 through May 16, 2008.

11 **RESPONSE NO. 22:**

12 Objection. This Interrogatory is vague as “exact whereabouts,” vague, overbroad and  
13 unduly burdensome. Without waiving said Objection, please see Response No. 21, and  
14 CHH00322-325.

15 DATED this 12<sup>th</sup> day of June, 2015.

16 HALL PRANGLE & SCHOONVELD, LLC

17 By: /s/ John Bemis  
18 MICHAEL E. PRANGLE, ESQ.  
19 Nevada Bar No. 8619  
20 JOHN F. BEMIS, ESQ.  
21 Nevada Bar No. 9509  
22 HALL PRANGLE & SCHOONVELD, LLC  
23 1160 North Town Center Drive, Suite 200  
24 Las Vegas, NV 89144  
25 Attorneys for Defendants  
26 Centennial Hills Hospital and  
27 Universal Health Services, Inc.  
28

VERIFICATION

STATE OF NEVADA       )  
                                      ) ss:  
COUNTY OF CLARK       )

AMANDA BELL, being first duly sworn and upon her oath, deposes and says:


That she is the Risk Analyst at Centennial Hills Hospital Medical Center, a named Defendant in the foregoing District Court action;

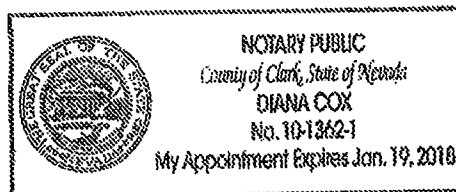
That she has read the foregoing Responses to Plaintiff's Eleventh Set of Interrogatories, knows the contents thereof, and the same is true to the best of her knowledge, except as to those matters therein stated on information and belief, and as to those matters, she believes them to be true. Information for these answers was gathered from various departments and individuals throughout Centennial Hills Hospital. Amanda Bell, Risk Analyst, of Centennial Hills Hospital reviewed same, and is signing these documents in her capacity, based upon information and belief that the information contained herein is accurate.

DATED this 12 day of June, 2015.

  
AMANDA BELL  
RISK ANALYST

Subscribed and sworn to before me this  
12 day of June, 2015.

  
NOTARY PUBLIC in and for said  
County of Clark and State of Nevada





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 12<sup>th</sup> day of June, 2015, I served a true and correct copy of the foregoing DEFENDANT VALLEY HEALTH SYSTEM, LLC'S RESPONSES TO PLAINTIFF'S ELEVENTH SET OF INTERROGATORIES 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/ Diana Cox  
An employee of HALL PRANGLE & SCHOONVELD, LLC

TAB 76

RSPN  
MICHAEL E. PRANGLE, ESQ.  
Nevada Bar No. 8619  
JOHN F. BEMIS, ESQ.  
Nevada Bar No. 9509  
HALL PRANGLE & SCHOONVELD, LLC  
1160 North Town Center Drive, Suite 200  
Las Vegas, NV 89144  
702-889-6400 – Phone  
702-384-6025 – Facsimile  
[mprangle@hpslaw.com](mailto:mprangle@hpslaw.com)  
[jbemis@hpslaw.com](mailto:jbemis@hpslaw.com)  
*Attorneys for Defendants*  
*Centennial Hills Hospital and*  
*Universal Health Services, Inc.*

DISTRICT COURT

CLARK COUNTY, NEVADA

MISTY PETERSEN, 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'S**  
**RESPONSES TO PLAINTIFF'S TENTH SET OF INTERROGATORIES**



COMES NOW, Defendant, VALLEY HEALTH SYSTEM, LLC, by and through their  
counsel of record, the law firm of HALL PRANGLE & SCHOONVELD, LLC, and hereby  
provides the following responses to Plaintiff's Tenth Set of Interrogatories:

**INTERROAGORIES**

**INTERROGATORY NO. 17:**

Identify any and all persons present at the meeting between Renato Sumera and  
Centennial Hills Hospital after Farmer was arrested.

**RESPONSE NO. 17:**

Objection. This Interrogatory is irrelevant. Counsel of record met with Mr. Sumera  
following Mr. Farmer's arrest. Former Centennial Hills Hospital Risk Manager, Janet Calliham,  
and her staff provided introduction and left the meeting prior to any substantive discussion.

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

HALL PRANGLE & SCHOONVELD, LLC

By: 

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

*Attorneys for Defendants*

*Centennial Hills Hospital and*

*Universal Health Services, Inc.*

HALL PRANGLE & SCHOONVELD, LLC  
1160 NORTH TOWN CENTER DRIVE  
SUITE 200  
LAS VEGAS, NEVADA 89144  
TELEPHONE: 702-389-6406 FACSIMILE: 702-384-6025

VERIFICATION

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

AMANDA BELL, being first duly sworn and upon her oath, deposes and says:

That she is the Risk Analyst at Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center, a named Defendant in the foregoing District Court action;

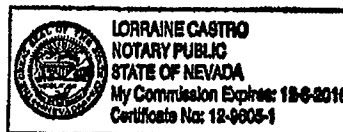
That she has read the foregoing Responses to Plaintiff's Tenth Set of Interrogatories, knows the contents thereof, and the same is true to the best of her knowledge, except as to those matters therein stated on information and belief, and as to those matters, she believes them to be true. Information for these answers was gathered from various departments and individuals throughout Centennial Hills Hospital. Amanda Bell, Risk Analyst, of Centennial Hills Hospital reviewed same, and is signing these documents in her capacity, based upon information and belief that the information contained herein is accurate.

DATED this 10 day of June, 2015.

*Amanda Bell*  
AMANDA BELL  
RISK ANALYST

Subscribed and sworn to before me this  
10 day of June, 2015.

*Lorraine Castro*  
NOTARY PUBLIC in and for said  
County of Clark and State of Nevada



**CERTIFICATE OF SERVICE**

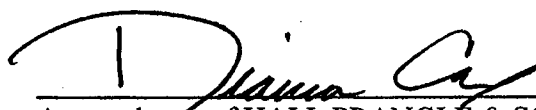
I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 10<sup>th</sup> day of June, 2015, I served a true and correct copy of the foregoing **DEFENDANT VALLEY HEALTH SYSTEM, LLC'S RESPONSES TO PLAINTIFF'S TENTH SET OF INTERROGATORIES** via E-Service on Wiznet pursuant to mandatory NEFCR 4(b) to the following parties:

Robert E. Murdock, Esq.  
MURDOCK & ASSOCIATES, CHTD.  
521 South Third 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