### IN THE SUPREME COURT OF THE STATE OF NEVADA

BARRY JAMES RIVES, M.D. and

LAPAROSCOPIC SURGERY OF NEVADA, LLC,

Appellants/Cross-Respondents,

VS.

TITINA FARRIS and PATRICK FARRIS.

Respondents/Cross-Appellants.

BARRY JAMES RIVES, M.D. and LAPAROSCOPIC SURGERY OF NEVADA, LLC,

Appellants,

VS.

TITINA FARRIS and PATRICK FARRIS,

Respondents.

80271 No.:

Electronically Filed

Appeal from the Eighth Judicial District Court, the Honorable Joanna Krishfer Presiding Clerk of Supreme Court

Presiding

81052 No.:

Appeal from the Eighth Judicial District Court, the Honorable Joanna S. Kishner Presiding

# RESPONDENTS/CROSS-APPELLANTS' APPENDIX, VOLUME 17 (Nos. 2105–2267)

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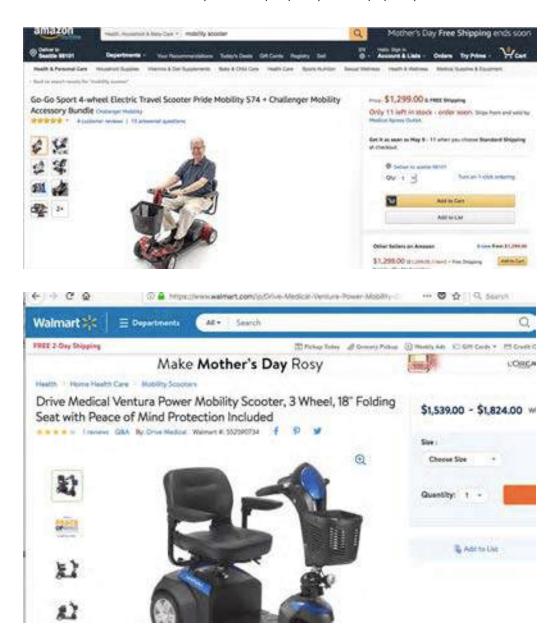
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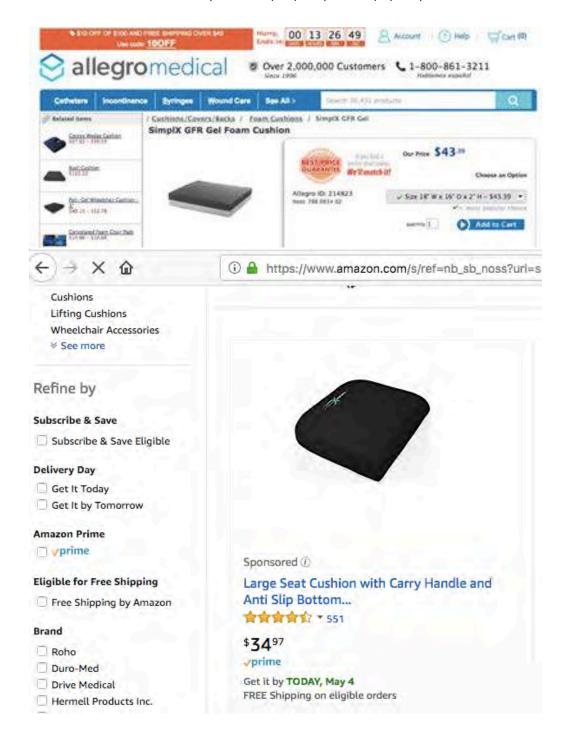
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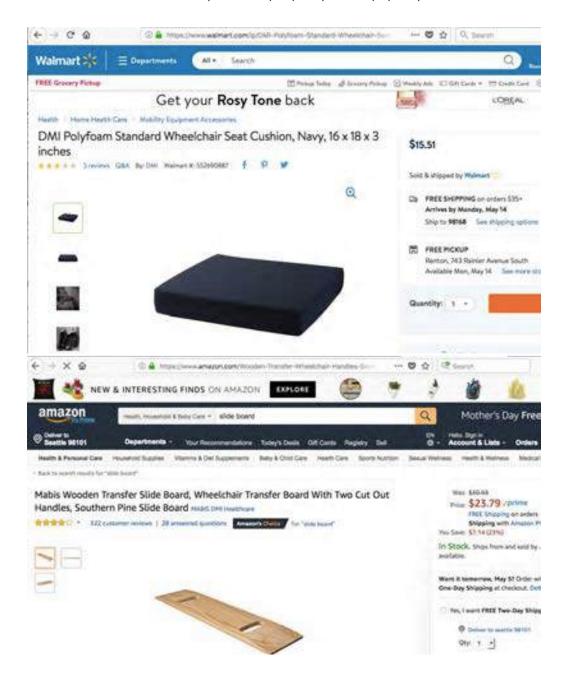
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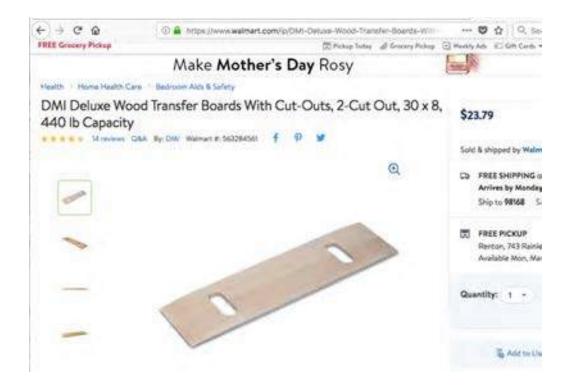




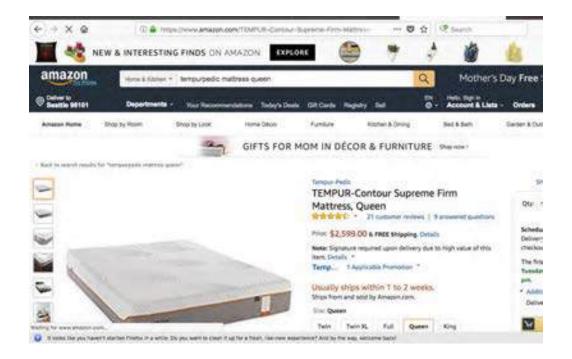


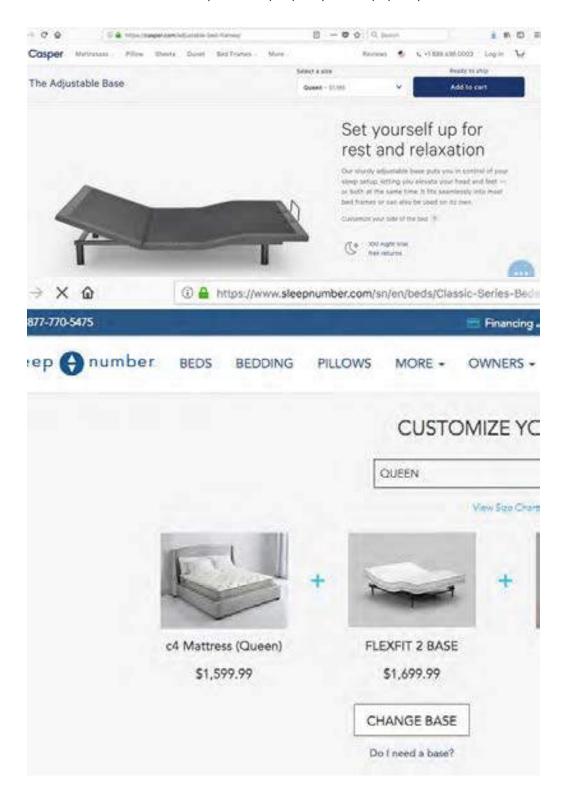




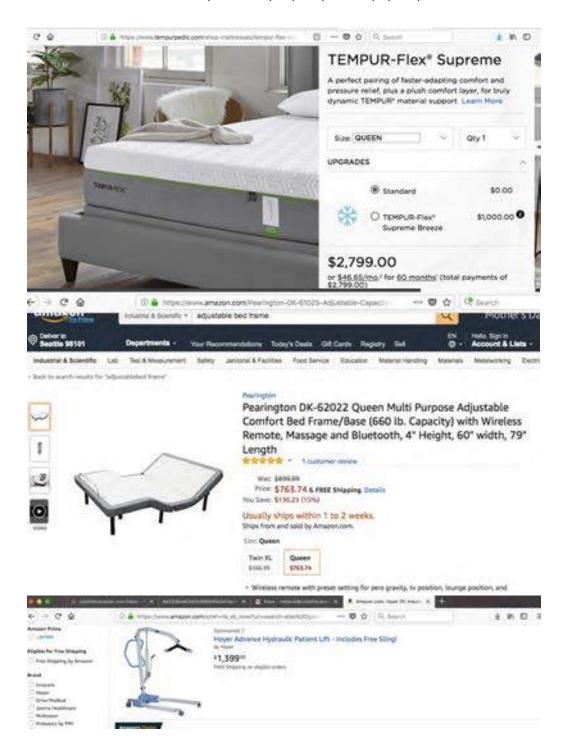


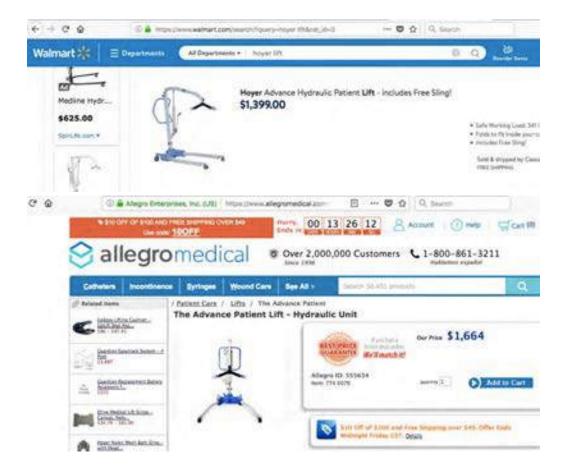


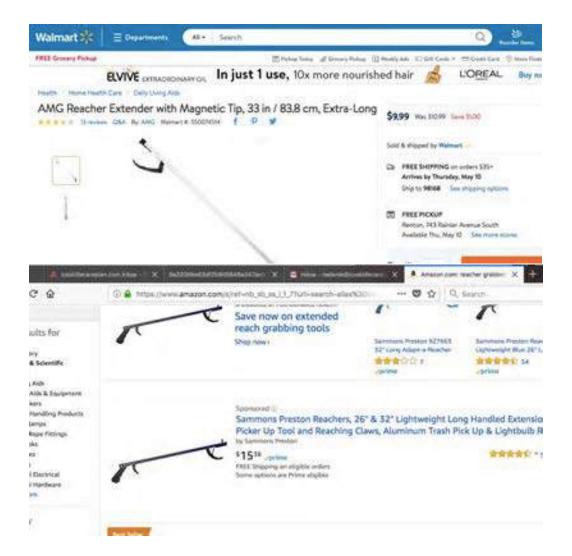


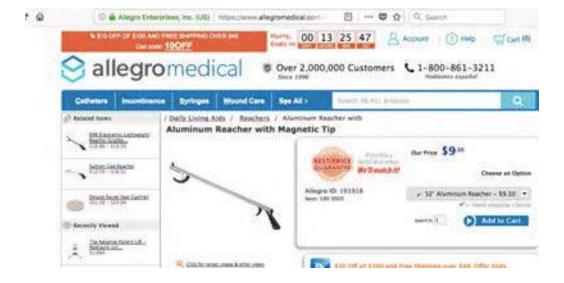


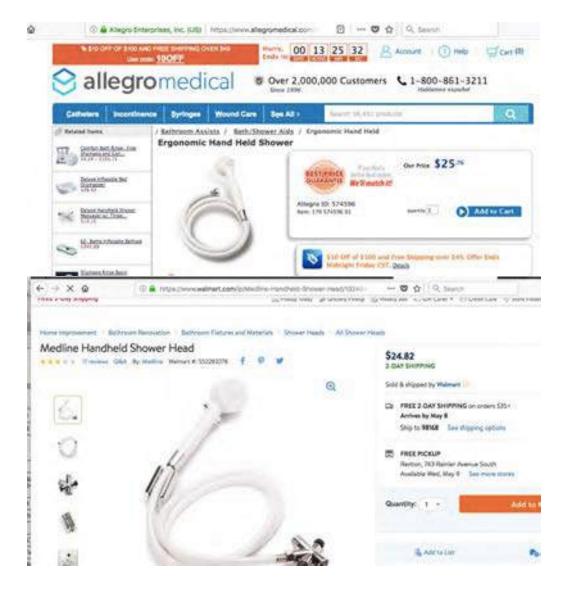
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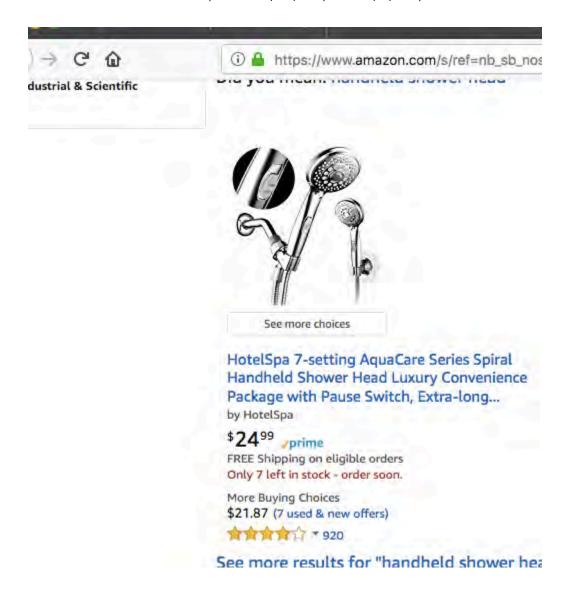


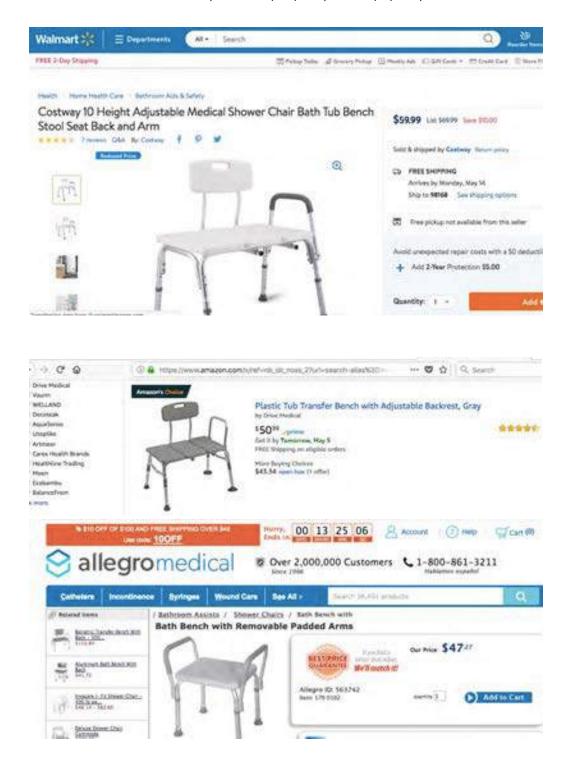






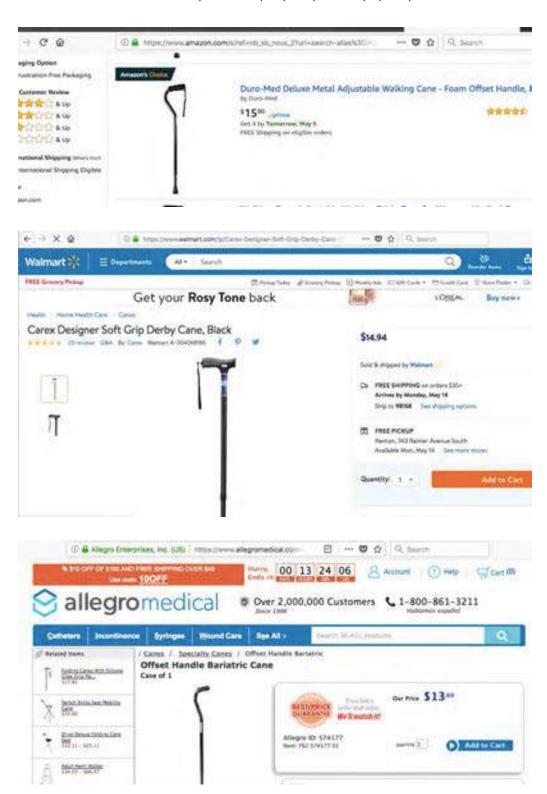






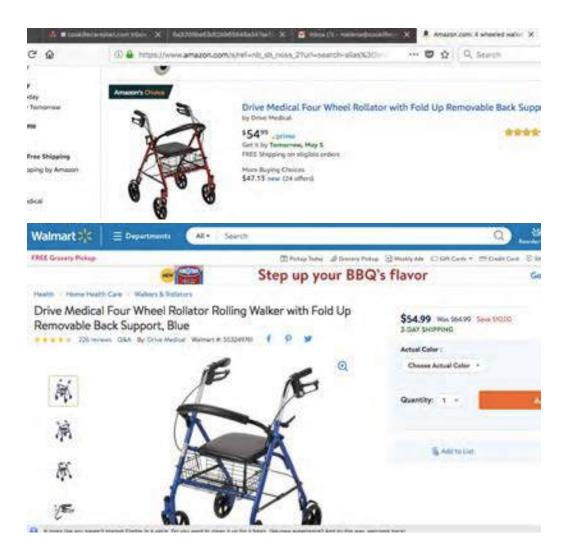
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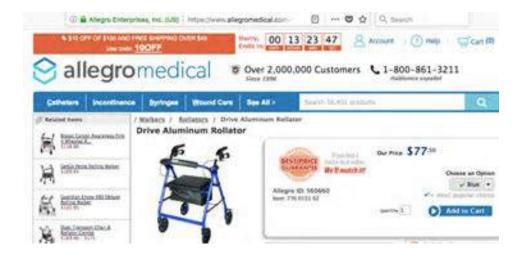




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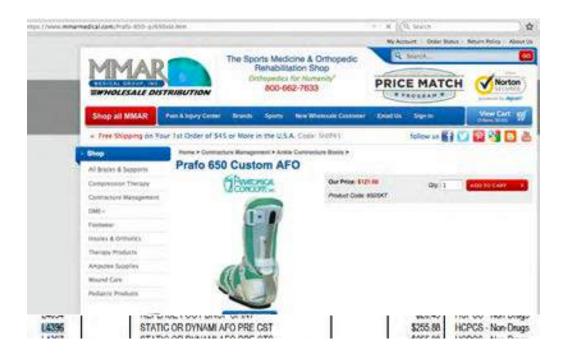


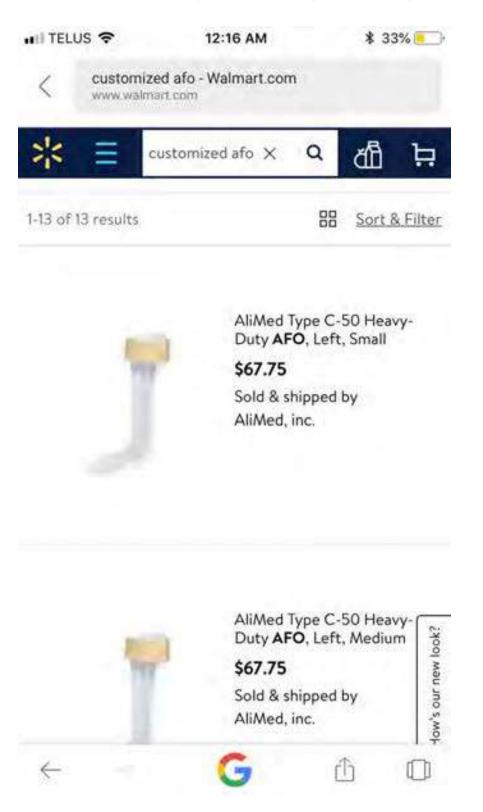












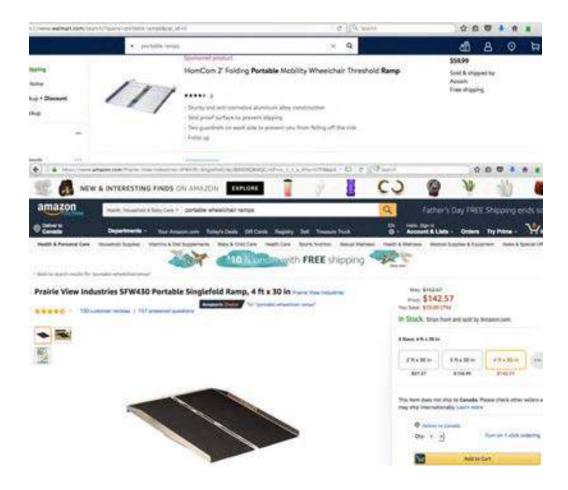
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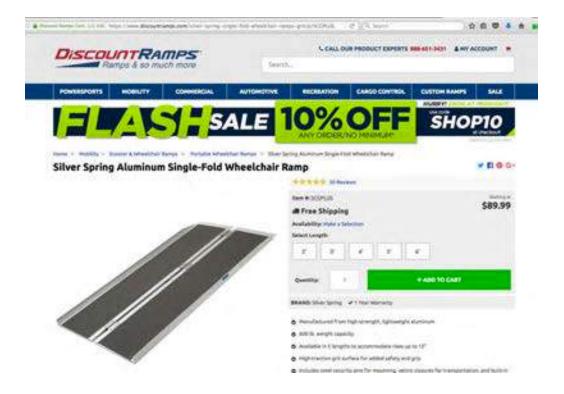
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#### **END OF REPORT**



# PAST MEDICAL BILL REVIEW FOR MS. TITINA FARRIS

Regarding: Farris v. Rives, et al. Date of Incident: July 3, 2015 Case No. A-16-739464-C

Prepared for: George Hand, Esq. Hand & Sullivan, LLC 3442 N. Buffalo Drive Las Vegas, NV 89129

Prepared by: Dawn Cook RN Dawn Cook Consulting LLC 1001 E. Sunset Road #97553 Las Vegas, NV 89193

November 15, 2018

Dawn Cook, RN, CLCP, CNLCP

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#### INTRODUCTION

At the request of George Hand, Esq. I have prepared this report following a review of past medical bills for Ms. Farris alleged to be related to her incident on 07/03/15. The scope of my review and research included the following:

- 1. Review of the bills and corresponding medical records
- 2. Research into the usual, reasonable and customary<sup>1</sup> cost for these bills

### **Summary of opinions:**

It is my opinion that the total amount of the charges that I reviewed are \$1,075,564.94.

It is my opinion that the usual, reasonable and customary charges for the allowable charges is \$1,222,026.79.

All my opinions rendered are within a reasonable degree of professional probability. I reserve the right to alter or amend my opinion upon my review of additional information. I also reserve the right to respond to the reports of other experts.

Dawn Cook RN Life Care Planner

<sup>&</sup>lt;sup>1</sup> URC (Usual, Reasonable and Customary) "The amount paid for a medical service in a geographic area based on what providers in the area usually charge for the same or similar medical service. The UCR amount sometimes is used to determine the allowed amount." <a href="https://www.healthcare.gov/glossary/UCR-usual-customary-and-reasonable/">https://www.healthcare.gov/glossary/UCR-usual-customary-and-reasonable/</a>

### **QUALIFICATIONS**

- A. I am a Registered Nurse with over 35 years experience in health care including hospitals and home care.
- B. I am a licensed Registered Nurse in Nevada and California. I maintain my licenses by successfully completing 30 continuing education credits every two years.
- C. I have two certifications as a life care planner and I maintain these certifications by accruing a minimum of 80 hours of continuing education credits every five years. In 2017 I renewed two life care planning certifications and I had 233 qualifying hours of continuing education.
  - a. Certified Life Care Planner (CLCP) from the International Commission for Health Care Certifications<sup>2</sup> (ICHCC) since 2013.
  - b. Certified Nurse Life Care Planner (CNLCP) from the Certification Board for the American Association of Nurse Life Care Planners<sup>3</sup> since 2015.
- D. I am experienced in life care planning and past medical bill review and in testifying:
  - a. I have prepared over 450 medical damages reports for both plaintiff and defense counsel since 2012.
  - b. I have prepared reports in 26 states in Life Care Planning and Past Medical Bill Reviews.
  - c. I have had my deposition testimony taken over 55 times since 2012
  - d. I have qualified at Federal Court and State Court in California, Nevada and New Mexico as a life care planner.
- E. I actively continue my education in life care planning, cost research and coding by attending conferences. I have annual continuing education that exceeds the requirements for maintaining my RN license and certifications as a nurse life care planner. My ongoing education includes nursing, life care planning, medical billing, coding and projecting usual, reasonable and customary medical costs.
- F. I am a member of:

3 http://cnlcp.org/

Dawn Cook Consulting

<sup>&</sup>lt;sup>2</sup> https://ichcc.org/certifications/clcp-cclcp-mscc-cgcm.html

- a. American Nursing Association<sup>4</sup>
- b. Nevada Nurses Association<sup>5</sup>
- c. American Association of Nurse Life Care Planners<sup>6</sup>
- d. International Association of Rehabilitation Professionals<sup>7</sup>
- e. American Association of Professional Coders<sup>8</sup>
- f. National Alliance of Medical Auditing Specialists9
- G. I actively participate in my professional associations by:
  - a. AANLCP Conference Planning Committee 2017-2018
  - b. AANLCP Journal Committee member and Peer Reviewer since 2015
- H. I purchase and subscribe to cost research materials:
  - a. Common Procedural Terminology<sup>10</sup> (CPT), Diagnosis Related Group<sup>11</sup> (DRG), ICD-10 and Healthcare Common Procedure Coding System<sup>12</sup> (HCPCS) coding books
  - b. PMIC Medical Fees<sup>13</sup> and Anesthesia Guides
  - c. American Hospital Directory<sup>14</sup> (on-line subscription source)
  - d. Direct communication with providers of medical care, supplies and medical equipment
  - e. Current billing records when available
  - f. VA<sup>15</sup>, Medicare<sup>16</sup> and Medicaid databases when applicable

#### **METHODOLOGY**

<sup>&</sup>lt;sup>4</sup> https://www.nursingworld.org/

<sup>&</sup>lt;sup>5</sup> http://www.nvnurses.org/

<sup>6</sup> http://www.aanlcp.org/

<sup>7</sup> https://rehabpro.org/

<sup>8</sup> https://www.aapc.com/

<sup>9</sup> http://namas.co/

<sup>10</sup> https://www.ama-assn.org/practice-management/cpt-current-procedural-terminology

<sup>11</sup> https://www.cms.gov/.../Defining the Medicare Severity Diagnosis Related Groups. 12 https://www.cms.gov/Medicare/Coding/MedHCPCSGenInfo/index.html

<sup>13</sup> http://pmiconline.stores.yahoo.net/mefe20.html

<sup>14</sup> https://ahd.com/

<sup>15</sup> https://www.va.gov/COMMUNITYCARE/revenue\_ops/payer\_rates.asp

<sup>16</sup> https://www.cms.gov/

My methodology in this report is to review bills and medical records, and research the usual, reasonable and customary (URC) charges based on this information.

**Codes**: I compare the bill's codes to the medical records to ensure that the codes are correct for the care documented. If the codes are not correct, I assign the appropriate code and explain. If there is no code on the bills, I research the most appropriate code and add this to the tables.

**Costing**: I provide the amount that my research reveals to be the usual, reasonable and customary (URC) cost or charge based on the resources used. I explain what resource I used.

#### Resources (see appendix A):

- 1. For physician care, labs, radiology and therapy codes, I refer to the American Medical Association's guides to Current Procedural Terminology that provides a code for most charges. For the URC, I use the current or correct year of Med Fees book (Practice Management Information Corporation) or as indicated in my report.
- 2. For in-patient hospital stays, I determine the correct diagnosis related group (DRG) code by reviewing the medical records and research. For the URC I use an average of the area or region that the care was received in, from the American Hospital Directory or as indicated in my report. I provide a screenshot of the findings.

### **DOCUMENTS**

#### Bills

- Advanced Orthopedics & Sports Medicine
- St. Rose Dominican San Mar
- Laparoscopic Surgery of Nevada (Dr. Barry Rives)
- Southern Nevada Surgery Specialists (Dr. Elizabeth Hamilton)
- ATI Physical Therapy (Desert Valley Therapy)
- Internal Medicine of Spring Valley
- St. Rose Dominican Siena
- Southern Nevada Pain Center

#### Medical Records:

- Advanced Orthopedics & Sports Medicine, 8420 west Warm Springs Road, Suite 100, Las Vegas, NV 89113
- Saint Rose Dominican Hospitals, San Martin Campus, 8280 West Warm Springs Road, Las Vegas, NV 89113
- Laparoscopic Surgery of Nevada, 8285 West Arby Avenue, Suite 190, Las Vegas, NV 89113
- Southern Nevada Surgery Specialists, 999 Adams Boulevard, Suite 104, Boulder City, Nevada, 89005
- Care Meridian, 3391 North Buffalo Drive, Las Vegas, NV 89129
- Bess Chang, MD/Neurology, 8530 West Sunset Road, Suite 350, Las Vegas, NV 89113
- Desert Valley Therapy/ATI Physical Therapy, 6830 Oquendo Road, Suite 101, Las Vegas, NV 89118
- Internal Medicine of Spring Valley, 5380 South Rainbow Boulevard, Suite 218, Las Vegas, NV 89118
- Saint Rose Dominican Hospitals, Siena Campus, 3001 St Rose Pkwy, Henderson, NV 89052
- Southern Nevada Pain Center, 6950 West Desert Inn Road, Suite 110, Las Vegas, NV 89117

	Advanced Orthopedics & Sports Medicine				
Date and Page #	Item and code	Charge	URC	Allowable	
08/31/15	CPT 99213 OV Est	\$210.00	\$144.38	\$144.38	
PLTF10122	Detailed exam				
p. 5					
08/31/15	CPT 73610-RT X-Ray	\$95.00	\$130.05	\$130.05	
PLTF10122	Exam of Ankle				
p. 5					
08/31/15	CPT 73610 LT X-Ray	\$95.00	\$130.05	\$130.05	
PLTF10122	exam of ankle				
p. 5					
08/31/15	CPT 73630 RT X-Ray	\$95.00	\$112.64	\$112.64	
PLTF10122	exam of foot				
p. 5					
08/31/15	CPT 73630 LT X-Ray	\$95.00	\$112.64	\$112.64	
PLTF10122	exam of foot				
p. 5					
Total		\$590.00	\$629.76	\$629.76	

#### **Resources Used:**

National Fee Analyzer 2014 using 75<sup>th</sup> percentile adjusted to Las Vegas, NV (x1.070) Medical Fees 2015 using 75<sup>th</sup> percentile adjusted to Nevada (x1.024)

VA Reasonable Charges 2014 and 2015<sup>A</sup>

Laparoscopic Surgery of Nevada (Dr. Barry Rives)						
Date and Page #	Item and code   Charge   IJKC   Allowable					
07/03/15 PLTF008649 p. 3	Repair of Intestine: 49655	\$3,814.00	\$3536.90	\$3536.90		
Total		\$3,814.00	\$3536.90	\$3536.90		

#### **Resources Used:**

Med Fees 2015 adjusted to Nevada 1.024

St. Rose Dominican San Mar				
Date and Page #	Item and code	Charge	URC	Allowable
07/05/15 -	DRG 003	\$908,033.12	\$802,877.66	\$802,877.66
08/11/15	37 days			
PLTF8909	-			
p. 9-193				
DRG 003: Tra	nch with mechanical ver	ntilation greater th	an 96 hours	
Total		\$908,033.12	\$802,877.66	\$802,877.66
Resources Used:				
American Ho	ospital Directory <sup>B</sup>			

Southern Nevada Surgery Specialists (Elizabeth Hamilton, MD & Gregg Ripplinger, MD)				
Date and Page #	Item and code	Charge	URC	Allowable
07/09/2015 PLTF8824 p. 81	CPT 99233 Subsequent Hospital care	\$470.00	\$261.12	\$261.12
07/16/2015 PLTF8824 p. 81	CPT 44143 22 Colectomy, partial; with end colostomy and closure of distal segment,	\$6,595.00	\$4,812.80	\$4,812.80

Southern Nevada Surgery Specialists (Elizabeth Hamilton, MD & Gregg Ripplinger, MD)					
Date and Page #	Item and code	Charge	URC	Allowable	
07/16/2015 PLTF8824 p. 81	CPT 44143 22 80 (assistant to surgeon) Colectomy, partial; with end colostomy and closure of distal segment,	\$1,625.00	\$962.56	\$962.56	
	1-008505: pages 43 – 48	T # 0 0 0	40.00	40.00	
09/11/2015 PLTF8824 p. 81	99024 – Post Op follow up visit	\$0.00	\$0.00	\$0.00	
11/06/2015 PLTF8824 p. 81	99212 Office Visit	\$75.00	\$99.33	\$99.33	
02/12/2016 PLTF8824 p. 81	99213 Office Visit	\$160.00	\$149.50	\$149.50	
04/22/2016 PLTF8824 p. 81	99213 Office Visit	\$160.00	\$149.50	\$149.50	
05/13/2016 PLTF8824 p. 81	99213 Office Visit	\$160.00	\$149.50	\$149.50	
07/01/2016 PLTF8824 p. 81	99214 Office Visit	\$235.00	\$149.50	\$149.50	
File: PLTF8824-8 99213	907: Pages 29 – 31: Docun	nentation is exp	anded problem	focused; code	
07/18/2016 PLTF8824 p. 81	44160 Colectomy; partial, with removal of terminal ileum with ileocolostomy	\$3,321.00	\$4,092.93	\$4,092.93	
	907: Pages 11 <b>-</b> 13				
08/01/2016 PLTF8824 p. 81	99024 Post Op follow up visit	\$0.00	\$0.00	\$0.00	
Total:		\$12,801.00	\$10,826.74	\$10,826.74	
Resources Used:					
Medical Fees 201	Medical Fees 2015 and 2016 using 75th percentile adjusted to Nevada (x1.024)				

	Care Meridian, LLC				
Date and Page #	Item and code	Charge	URC	Allowable	
08/11/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/11/15 PLTF10175 p. 11	R&B Complex - Level IV	\$150.00	\$424.96 (99254)	\$424.96	
08/12/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/12/15 PLTF10175 p. 11	Pharmacy	\$3,471.63	\$0.00	\$0.00	
Pharmacy ite 08/13/15 PLTF10175 p. 11	ms are included in acu R&B Complex - Level IV	\$1,478.00	re are no addition \$2,542.74	\$2,542.74	
08/14/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/15/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/16/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/17/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/18/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	
08/19/15 PLTF10175 p. 11	R&B Complex - Level IV	\$1,478.00	\$2,542.74	\$2,542.74	

	Care Meridian, LLC				
Date and Page #	Item and code	Charge	URC	Allowable	
08/20/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11					
08/21/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11					
08/22/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11					
08/23/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11					
08/24/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11					
08/25/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11	DA D	<b>41.4 15</b> 2 2 2	<b>***</b>	<b>***</b>	
08/26/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11	D ( D	ф1 4 <b>5</b> 0 00	Ф2 F 12 F 1	ФО F 40 F 4	
08/27/15	R&B	\$1,478.00	\$2,542.74	\$2,542.74	
PLTF10175	Complex - Level IV				
p. 11	that DDC 045 D.1. 1 1	the enteresting of			
	I determined that DRG 945: Rehab is the appropriate code.				
Total		\$28,747.63	\$43,651.54	\$43,651.54	
	Resources Used:  Medical Fees 2015 using 75 <sup>th</sup> percentile adjusted to Nevada (x1.024)				
		me adjusted to N	evada (X1.024)		
American Hospital Directory <sup>C</sup>					

	Dr. Bess Chang				
Date and Page #	Item and code	Charge	URC	Allowable	
09/14/15	CPT 95913 Nerve	\$636.00	\$1,169.41	\$1,169.41	
PLTF008698	Conduction study;				
p. 4	13 or more studies				
	(1 unit)				

Dr. Bess Chang					
Date and Page #	Item and code	Charge	URC	Allowable	
09/14/15 PLTF008698 p. 4	CPT 95886 Musc Test done w/n test comp. (2 units)	\$382.00	\$620.54	\$620.54	
File: PLTF008	8698-008706: Pages 5 – 9	: Report available			
Total		\$1,018.00	\$1,789.95	\$1,789.95	
Resources Used:					
Medical Fees	2015 using 75th percent	ile adjusted to Ne	vada (x1.024)		

ATI Physical Therapy				
Date and Page #	Item and code	Charge	URC	Allowable
11/12/2015 Pg. PLTF8748	97001, PT Evaluation	\$200.00	\$186.37	\$186.37
11/18/2015	97014 Electrical Stimulation Unattended	\$25.00	\$41.98	\$41.98
11/18/2015	97112 Neuromuscular Re-education	\$55.00	\$66.56	\$66.56
11/18/2015	97530 Therapeutic Activity x2	\$120.00	\$139.26	\$139.26
12/01/2015	97014 Electrical Stimulation Unattended	\$25.00	\$41.98	\$41.98
12/01/2015	97112 Neuromuscular Re-education	\$55.00	\$66.56	\$66.56
12/01/2015	97530 Therapeutic Activity x2	\$120.00	\$139.26	\$139.26
12/03/2015	97014 Electrical Stimulation Unattended	\$25.00	\$41.98	\$41.98
12/03/2015	97112 Neuromuscular Re-education	\$55.00	\$66.56	\$66.56
12/03/2015	97530 Therapeutic Activity x2	\$120.00	\$139.26	\$139.26
01/11/2016 Pg. PLTF8749	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03

ATI Physical Therapy				
Date and Page #	Item and code	Charge	URC	Allowable
01/11/2016	97530 Therapeutic Activity x2	\$130.60	\$139.26	\$139.26
01/14/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
01/14/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46
01/14/2016	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63
01/21/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
01/21/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46
01/21/2016	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63
01/26/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
01/26/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46
01/26/2016	97530 Therapeutic Activity x2	\$130.60	\$139.26	\$139.26
01/28/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
01/28/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63
01/28/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46
01/28/2016	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63
02/08/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
02/08/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63
02/08/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46

ATI Physical Therapy						
	Till I hybicul Therupy					
Date and	Item and code	Charge	URC	Allowable		
Page #	2000	4.5.0	<b>*</b> * * * * * * * * * * * * * * * * * *	<b>.</b>		
02/08/2016	97530 Therapeutic	\$65.30	\$69.63	\$69.63		
	Activity					
02/10/2016	97014 Electrical	\$34.87	\$44.03	\$44.03		
	Stimulation					
22/12/2011	Unattended		4.0.15			
02/10/2016	97110 Therapeutic	\$65.31	\$69.63	\$69.63		
Pg. PLTF8750	Exercise					
02/10/2016	97112 Neuromuscular	\$63.92	\$84.46	\$84.46		
	Re-education					
02/10/2016	97530 Therapeutic	\$65.30	\$69.63	\$69.63		
	Activity					
02/16/2016	97014 Electrical	\$34.87	\$44.03	\$44.03		
	Stimulation					
	Unattended					
02/16/2016	97110 Therapeutic	\$65.31	\$69.63	\$69.63		
	Exercise					
02/16/2016	97112 Neuromuscular	\$63.92	\$84.46	\$84.46		
	Re-education					
02/16/2016	97530 Therapeutic	\$65.30	\$69.63	\$69.63		
	Activity					
02/18/2016	97014 Electrical	\$34.87	\$44.03	\$44.03		
	Stimulation					
	Unattended					
02/18/2016	97110 Therapeutic	\$65.31	\$69.63	\$69.63		
	Exercise					
02/18/2016	97112 Neuromuscular	\$63.92	\$84.46	\$84.46		
	Re-education					
02/18/2016	97530 Therapeutic	\$65.30	\$69.63	\$69.63		
	Activity					
02/22/2016	97014 Electrical	\$34.87	\$44.03	\$44.03		
	Stimulation					
	Unattended					
02/22/2016	97110 Therapeutic	\$130.62	\$139.26	\$139.26		
	Exercise x2					
02/22/2016	97112 Neuromuscular	\$63.92	\$84.46	\$84.46		
	Re-education					
02/22/2016	97530 Therapeutic	\$65.30	\$69.63	\$69.63		
	Activity					

	ATI Physical Therapy				
Date and Page #	Item and code	Charge	URC	Allowable	
02/25/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03	
02/25/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63	
02/25/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46	
02/25/2016 Pg. PLTF8751	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63	
03/07/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03	
03/07/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63	
03/07/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46	
03/07/2016	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63	
03/14/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03	
03/14/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63	
03/14/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46	
03/14/2016	97530 Therapeutic Activity x2	\$130.60	\$139.26	\$139.26	
03/17/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03	
03/17/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63	
03/17/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46	

ATI Physical Therapy				
Date and Page #	Item and code	Charge	URC	Allowable
03/17/2016 Pg. PLTF8752	97530 Therapeutic Activity x2	\$130.60	\$139.26	\$139.26
03/21/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
03/21/2016	97110 Therapeutic Exercise	\$65.31	\$69.63	\$69.63
03/21/2016	97112 Neuromuscular Re-education	\$63.92	\$84.46	\$84.46
03/21/2016	97530 Therapeutic Activity	\$65.30	\$69.63	\$69.63
04/20/2016	97014 Electrical Stimulation Unattended	\$34.87	\$44.03	\$44.03
04/20/2016	97110 Therapeutic Exercise x3	\$195.93	\$208.90	\$208.90
	ges are accounted for.		Τ.	T .
Total:		\$4,473.15	\$5,184.12	\$5,184.12
Resources Used:				2.2.1)
Medical Fees 201	5 and 2016 using $75^{th}$ perc	entile adjusted	d to Nevada (x1	.024)

Internal Medicine of Spring Valley (Dr. Naomi Chaney)					
Date and Page #	Item and code	Charge	URC	Allowable	
09/01/2015	99213 Office	\$125.00	\$144.38	\$144.38	
PLTF100092	Outpatient Visit 15				
p. 19	minutes				
09/18/2015	99213 Office	\$125.00	\$144.38	\$144.38	
PLTF100092	Outpatient Visit 15				
p. 19 minutes					

Dawn Cook Consulting

10/22/2015	99213 Office	\$125.00	\$144.38	\$144.38
PLTF100092	Outpatient Visit 15			
p. 18	minutes			
				•
11/20/2015	99213 Office	\$125.00	\$144.38	\$144.38
PLTF100092	Outpatient Visit 15			
p. 18	minutes			
12/15/2015	99213 Office	\$125.00	\$144.38	\$144.38
PLTF100092	Outpatient Visit 15			
p. 18	minutes			
12/15/2015	93000 ECG Routine	\$75.00	\$84.99	\$0.00
PLTF100092	w/Least 12 LDS			
p. 18	w/I&R			
The charge is not re	elated to DOI and there	fore not allowe	ed.	•
01/20/2016	99396 Periodic	\$200.00	\$261.12	\$0.00
PLTF100092	Preventive Med Est			, , , , , , , , , , , , , , , , , , , ,
p. 17	Patient 40-64 yrs			
	is unrelated to the inju	rv. The charge	is not allowed.	
02/13/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15	Ψ120.00	Ψ117.00	Ψ117.50
p. 17	minutes			
03/11/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15	Ψ1 <b>201</b> 00	φ113.00	ψ113.0°0
p. 17	minutes			
04/14/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15	7	7 7 - 7 - 7	7-27.00
p. 16	minutes			
05/17/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15	i i		
p. 16	minutes			
06/09/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 16	minutes			
06/27/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 15	minutes			
08/15/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 15	minutes			
09/22/2016	99213 Office	\$125.00	\$149.50	\$0.00
PLTF100092	Outpatient Visit 15			
p. 14	minutes			

File: PLTF9125-I	PLTF10091: Pages 689 - 69	0: Documenta	tion reflects the	e office visit was
unrelated to DO	I. The charge is not allow	red.		
10/26/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 14	minutes			
•		l	l .	
11/29/2016	99213 Office	\$125.00	\$149.50	\$0.00
PLTF100092	Outpatient Visit 15			
p. 14	minutes			
	PLTF10091: Pages 713 - 71	4: Documenta	tion reflects the	e office visit was
	I. The charge is not allow			
12/28/2016	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 14	minutes			
_ <u> </u>	minutes			
01/26/2017	99213 Office	\$125.00	\$159.74	\$0.00
PLTF100092	Outpatient Visit 15	φ123.00	Ψ137.74	ψ0.00
p. 14	minutes			
	PLTF10091: Pages 743 - 74	1. Dogumenta	tion roflects the	office wieit was
	O O		mon reflects the	e office visit was
	I. The charge is not allowed 99214 Office	\$165.00	\$234.50	¢0.00
02/23/2017		\$165.00	\$234.30	\$0.00
PLTF100092	Outpatient Visit 25			
p. 13	minutes		Carana Clarata (la	((:
File: PL1F9125-1	PLTF10091: Pages 752 - 75	3: Documenta	ition reflects the	e office visit was
	I. The charge is not allow		ф1 <u>ГО</u> <u>7</u> 4	Φ0.00
03/01/2017	99213 Office	\$125.00	\$159.74	\$0.00
PLTF100092	Outpatient Visit 15			
p. 12	minutes			
	PLTF10091: Pages 770 - 77		ition reflects the	e office visit was
	I. The charge is not allow			
03/30/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 12	minutes			
04/26/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 12	minutes			
			<u>.</u>	
05/25/2017	99396 Periodic	\$200.00	\$277.50	\$0.00
PLTF100092	Preventive Med Est			
p. 11	Patient 40-64 yrs			
		L		1

05/25/2017	93000 ECG Routine	\$75.00	\$88.64	\$0.00
PLTF100092	w/Least 12 LDS			
p. 11	w/I&R			
Preventative heal	th is unrelated to the inju	ıry. The charş	ges for 05/25/1	7 are not allowed.
06/29/2017	99396 Periodic	\$200.00	\$277.50	\$0.00
PLTF100092	Preventive Med Est			
p. 11	Patient 40-64 yrs			
06/29/2017	Q0091 Screening	\$125.00	\$0.00	\$0.00
PLTF100092	PAP Smear			
p. 11				
	th is unrelated to the inju	ıry. The charş	ges for 06/29/1	7 are not allowed.
08/02/2017	99213 Office	\$125.00	\$159.74	\$0.00
PLTF100092	Outpatient Visit 15			
p. 10	minutes			
File: PLTF9125-PI	LTF10091: Pages 850 - 85	1: Documenta	tion reflects the	e office visit was
unrelated to DOI.	The charge is not allow			
08/31/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 10	minutes			
09/28/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 10	minutes			
		•		
10/27/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 9	minutes			
11/30/2017	99213 Office	\$125.00	\$159.74	\$159.74
PLTF100092	Outpatient Visit 15			
p. 9	minutes			
	•	•	<u>'</u>	•
01/09/2018	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15	, =======	7	, = = , , ,
p. 9	minutes			
1				
02/06/2018	99213 Office	\$125.00	\$149.50	\$0.00
PLTF100092	Outpatient Visit 15	123.00	Ψ117.00	Ψ0.00
p. 8	minutes			
	LTF10091: Pages 922 - 923	3: Documenta	tion reflects the	e office visit was
	The charge is not allowed		in the second second second	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
	crising to not unow			

03/07/2018	99213 Office	\$125.00	\$149.50	\$0.00
PLTF100092	Outpatient Visit 15			
p. 8	minutes			
File: PLTF9125-PLT	F10091: Pages 931 - 932:	Documentatio	n reflects the of	fice visit was
unrelated to DOI. T	he charge is not allowed	l.		
03/22/2018	99213 Office	\$125.00	\$149.50	\$149.50
PLTF100092	Outpatient Visit 15			
p. 8	minutes			
Total		\$6,570.00	\$7,878.98	\$5,727.01

#### **Resources Used:**

National Fee Analyzer using 75th percentile adjusted to Las Vegas, NV (x1.070)

Medical Fees 2015 and 2016 using 75th percentile adjusted to Nevada (x1.024)

Medical Fees 2017 using 75th percentile adjusted to Nevada (x1.015)

Medical Fees 2018 using 75th percentile adjusted to Nevada (x1.005)

	St. Rose Dominican Siena					
Date and Page #	Item and code	Charge	URC	Allowable		
07/18/16 - 07/25/16 PLTF9102 p. 13-23	DRG 329	\$104,120.04	\$338,136.66	\$338,136.66		

File: PLTF8824-8907: Page 9: Admission for colostomy reversal. Post-operative period was complicated by pain then s/sx C-Diff: N/V/Diarrhea (C-Diff was negative), she was dehydrated and developed acute kidney injury which later resolved once hydrated. DRG 329 is the most appropriate

Total		\$104,120.04	\$338,136.66	\$338,136.66
Recourage II	end:			

American Hospital Directory<sup>D</sup>

Southern Nevada Pain Center				
Date and Page #	Item and code	Charge	URC	Allowable
04/05/18 PLTF10150 p. 6	CPT 99243 Office Consultation	\$375.00	\$332.66	\$332.66
04/30/18 PLTF10150 p. 6	CPT 99213 Office Visit	\$160.00	\$154.77	\$154.77

	Southern Nevada Pain Center				
Date and Page #	Item and code	Charge	URC	Allowable	
05/30/18 PLTF10150 p. 6	CPT 99213 Office Visit	\$160.00	\$154.77	\$154.77	
06/27/18 PLTF10150 p. 6	CPT 99213 Office Visit	\$160.00	\$154.77	\$154.77	
08/23/18 PLTF10150 p. 6	CPT 99213 Office Visit	\$160.00	\$154.77	\$154.77	
Total \$1,015.00 \$951.74 \$951.74 Resources Used:					

Medical Fees 2018 using 75th percentile adjusted to Nevada (x1.005)

Bill Review Total Costs		
FACILITY OR PROVIDER	Charged	Allowable
Advanced Orthopedics & Sports Medicine	\$4,973.00	\$5,503.94
St. Rose Domincan San Mar	\$908,033.12	\$802,877.66
Laparoscopic Surgery of Nevada (Dr. Barry Rives)	\$3,814.00	\$3,536.90
Southern Nevada Surgery Specialists (Dr. Hamilton	\$12,801.00	\$14,748.66
Care Meridian	\$28,747.63	\$43,651.54
Dr. Bess Chang	\$1,018.00	\$1,789.95
ATI Physical Therapy (Desert Valley Therapy)	\$4,473.15	\$5,102.73
Internal Medicine of Spring Valley (Dr. Chaney)	\$6,570.00	\$5,727.01
St. Rose Dominican Siena	\$104,120.04	\$338,136.66
Southern Nevada Pain Center	\$1,015.00	\$951.74
Total:	\$1,075,564.94	\$1,222,026.79

### **Appendix A: REFERENCES**

#### Qualifications and Methodology:

- 1. American Nurses Association (ANA). (n.d.). https://www.nursingworld.org/
- 2. Nevada Nurses Association. <a href="http://www.nvnurses.org/">http://www.nvnurses.org/</a>
- 3. <u>International Commission on Health Care Certification</u>: Certification Programs, Standards Manual and Ethical Practice Guidelines. https://ichcc.org/certifications/clcp-cclcp-mscc-cgcm.html
- 4. International Association of Rehabilitation Professions, https://rehabpro.org/
- 5. Certified Nurse Life Care Planner (CNLCP). (2018). http://cnlcp.org/
- 6. American Association of Nurse Life Care Planners (AANLCP). (n.d.). <a href="https://www.aanlcp.org/default.aspx">https://www.aanlcp.org/default.aspx</a>
- 7. American Academy of Professional Coders (AAPC). (201820). https://www.aapc.com/
- 8. International Association of Rehabilitation Professionals (IARP). https://rehabpro.site-ym.com/default.aspx
- 9. National Alliance of Medical Auditing Specialists (NAMAS). <a href="https://namas.co/">https://namas.co/</a>

### Coding, Auditing and Usual, Reasonable and Customary Costs:

- 1. HealthCare.gov Glossary: UCR (Usual, Customary, and Reasonable). (n.d.). <a href="https://www.healthcare.gov/glossary/UCR-usual-customary-and-reasonable/">https://www.healthcare.gov/glossary/UCR-usual-customary-and-reasonable/</a>
- 2. American Medical Association (AMA): CPT® (Current Procedural Terminology). <a href="https://www.ama-assn.org/practice-management/cpt-current-procedural-terminology">https://www.ama-assn.org/practice-management/cpt-current-procedural-terminology</a>
- 3. Centers for Medicare & Medicaid Services (CMS). Defining the Medicare Severity Diagnosis Related Groups (MS-DRGs), <a href="https://www.cms.gov">https://www.cms.gov</a>
- 4. Centers for Medicare & Medicaid Services (CMS). *HCPCS General Information*. (2018).
  - http://www.cms.gov/Medicare/Coding/MedHCPCSGenInfo/index.html
- 5. Davis, J. (2017). Medical Fees 2018: A Comprehensive Listing of Current UCR and Medicare Fees with Relative Value Units (e-Book) Practice Management Information Corporation (PMIC).

Dawn Cook Consulting

- 6. American Hospital Directory <a href="https://ahd.com">https://ahd.com</a>
- 7. U.S. Department of Veterans Affairs. (2018). VHA Office of Community Care. https://www.benefits.va.gov/homeloans/adaptedhousing.asp
- 8. Centers for Medicare & Medicaid Services (CMS). Research, Statistics, Data & Systems. <a href="https://www.cms.gov/Research-Statistics-Data-and-Systems/Research-Statistics-Data-and-Systems.html">https://www.cms.gov/Research-Statistics-Data-and-Systems.html</a>
- 9. Arias, E., Heron, M., & Xu, J. (2017, August 14). United States Life Tables, 2014. National Vital Statistics Reports, 66(4). https://www.cdc.gov/nchs/data/nvsr/nvsr66/nvsr66\_04.pdf
- 10. Davis, J. (2017). Medical Fees 2018: A Comprehensive Listing of Current UCR and Medicare Fees with Relative Value Units (e-Book). (2017). Practice Management Information Corporation (PMIC).
- 11. Marini, I., & Harper, D. (2006). Empirical Validation of Medical Equipment Replacement Values in Life Care Plans. *Journal of Life Care Planning*, 4(4), 173-182. <a href="http://www.flcpr.org/Documents/Marini\_Harper\_JLCP\_4\_173-182.pdf">http://www.flcpr.org/Documents/Marini\_Harper\_JLCP\_4\_173-182.pdf</a>
- 12. American Family Physician, Preoperative Testing Before Non-cardiac Surgery: Guidelines and Recommendations, <a href="http://www.aafp.org/afp/2013/0315/p414.html">http://www.aafp.org/afp/2013/0315/p414.html</a>
- 13. Goodrx.com is a listing source from millions of prices and discounts from pharmacies, drug manufacturers and other sources. The range of prices in a particular zip code are listed. <a href="http://www.goodrx.com/how-goodrx-works">http://www.goodrx.com/how-goodrx-works</a>
- 14. Explanation of assistants to surgery and payment: <u>http://www.medicarepaymentandreimbursement.com/2015/02/assistant-surgery-modifiers.html</u>
- 15. Assistants at Surgery, American College of Surgeons 2018 guidelines of surgeries and need for assistant, retrieved from <a href="http://bulletin.facs.org/2018/04/acs-releases-2018-update-to-the-physicians-as-assistants-at-surgery-report/#.WySbyqknZsM">http://bulletin.facs.org/2018/04/acs-releases-2018-update-to-the-physicians-as-assistants-at-surgery-report/#.WySbyqknZsM</a>

## Appendix B: RESOURCES FOR COST ANALYSIS

A VA Reasonable Charges 2014 - J1040 - \$17.83 x 1.32 (GAAF) = \$23.54 2015 - J1040 - \$23.35 x 1.31 (GAAF) = \$29.28

<sup>B</sup> American Hospital Directory DRG 003 – University Medical Center \$726,260.00, Sunrise Hospital \$817,733, Metropolitan Area \$864,640 Avg. \$802,877.66

MB-086 003 - ECHNO DR TRACH W MY >64 HIS OR POX EXC FACE, MOUTH A RACK W RAU O R. THACK W R

<sup>c</sup> DRG 945 – Daily Rate Avg. \$32,038.50 – 12.6 = Daily Rate of \$2,542.74 Encompass Health Rehabilitation of Desert Canyon \$29,663 – ALOS 12.3, Encompass Health Rehabilitation Hospital of Las Vegas \$34,414 – ALOS 12.9

HS-DRG 945 - REHABILITATION W CC/MCC

HS-DRG 945 - REHABILITATION W CC

DRG 329 – Sunrise Hospital \$392,903,University Hospital \$312,904,
 MountainView Hospital \$308,603 Avg. \$338,136.66





# Curriculum Vitae Dawn Cook, RN, CNLCP, LNCP-C, CLCP

1001 E. Sunset Rd #97553, Las Vegas, NV 89193-7553 702-544-2159 Fax 702-543-7133 Dawn@CookLifeCarePlan.com

#### **SUMMARY OF QUALIFICATIONS**

- ♦ Licensed registered nurse with over 30 years of experience in clinical settings and as a life care planner and medical bill reviewer.
- ♦ Three certifications as a life care planner.
- Prepared reports in 22 states in Life Care Planning and Past Medical Bill Reviews.
- Qualified at Federal Court and State Court in California, Nevada and New Mexico as a life care planner.

#### PROFESSIONAL CREDENTIALS

- 2015 Certified Nurse Life Care Planner (CNLCP) #4150834
- 2012 Certified Life Care Planner (CLCP) #1159
- 2012 Lifetime Nurse Care Planner-Certified (LNCP-C)
- 2012 RN License Nevada #RN71479
- 1986 RN License California #411737

#### **EDUCATION**

2011	Life Care Pl	lanning Course,	Kelynco Univers	sity, Draper, Utah, USA

1988 Critical Care Nursing Course, Kuakini Medical Center, Honolulu, Hawaii, USA

1979 Nursing Diploma, Valedictorian, Royal Jubilee School of Nursing, Victoria, British

Columbia, Canada

#### PROFESSIONAL MEMBERSHIPS

2018-present National Alliance of Medical Auditing Specialists (NAMAS	2018-present	National	Alliance of	Medica	ıl Auc	diting	Specia	ilists	(NAMAS	5)
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2018-present American Association of Professional Coders (AAPC)

2012-present Organization of Lifetime Nurse Care Planners

2012-present International Association of Rehab Professionals (IARP)

2012-present American Association of Nurse Life Care Planners (AANLCP)

2012-present American Nurses Association (ANA)

2012-present Nevada Nurses Association (NNA)

#### **PROFESSIONAL COMMITTEES**

2017-2018 Conference Planning Committee AANLCP

2016-2017 Executive Forum in Lifetime Nurse Care Planning Committee member

2013-present AANLCP Journal Committee member and Peer Reviewer

#### PROFESSIONAL SUBSCRIPTIONS

- ♦ American Nurse Today
- ♦ Journal of Issues in Nursing
- ♦ American Nursing Association Smart Brief
- ♦ Journal of American Association of Nurse Life Care Planners
- ♦ Journal of American Association of Legal Nurse Consultants
- ♦ Journal of Life Care Planning
- ♦ Nevada RN Formation

#### **PRESENTATIONS**

- 1. Presenter, "Medical Bill Reviews, a Primer for Law Offices." Las Vegas Valley Paralegal Association, January 16, 2018, Las Vegas, Nevada.
- 2. Presenter, "Transplantation Costs and Litigation, Valuing the Lifetime Cost of Organ Transplantation." International Transplantation Nurse Society annual conference, June 26, 2017, Lake Buena Vista, Florida.
- 3. Presenter, "Complex Regional Pain Syndrome and Nurse Life Care Planning." American Association of Nurse Life Care Planners, February 7, 2016, San Antonio, Texas.
- 4. Presenter, "How to Select a Life Care Planning Expert Witness." Las Vegas Valley Paralegal Association, October 15, 2015, Las Vegas, Nevada.
- 5. Presenter, "Complex Regional Pain Syndrome and Pain Management." American Society of Pain Management Nursing, September 19, 2015, Atlanta, Georgia.
- 6. Presenter, "Complex Regional Pain Syndrome and Life Care Planning." Executive Forum for Lifetime Nurse Care Planners, May 3, 2015, Honolulu, Hawaii.
- 7. Presenter, "Complex Regional Pain Syndrome for Legal Nurse Consultants." American Association of Legal Nurse Consultants, April 18, 2015, Indianapolis, Indiana.
- 8. Presenter, "The Movable Office." International Symposium of Life Care Planners, September 21, 2014, Minneapolis, Minnesota.
- 9. Presenter, "Anatomy and Physiology 101 for Attorneys." National Business Institute seminar, January 31, 2013, Fresno, California.

#### **PUBLICATIONS**

- 1. Cook, D. L. (2017) "Platelet-Rich-Plasma: Life Care Planning Considerations." *Journal of Nurse Life Care Planners*. Fall 2017, vol. XVII NO. 3: pp. 28-31.
- 2. Cook, D. L. (2016) "ASPMN Core Curriculum for Pain Management Nursing" Book Review. *Journal of Nurse Life Care Planners*. Spring 2016, vol. XVI NO. 1: p. 13.
- 3. Cook, D. L. (2015) "The Work of Business, Expert Witness Development and Training." *Journal of Nurse Life Care Planners*. Fall 2015, vol. XV NO. 3: p. 884.
- 4. Cook, D. L. (2015) "The Work of Business, Can You Hear Me Now?" *Journal of Nurse Life Care Planners*. Summer 2015, vol. XV NO. 2: p. 812.
- 5. Cook, D. L. (2013) "Back and Neck Injuries", "Hand and Wrist Injuries" and "Knee Injuries." *Anatomy and Physiology 101 for Attorneys*. Eau Claire, WI: National Business Institute, publisher. pp. 33-63, 93-148.

#### **RECENT CONFERENCES**

- ♦ American Association of Nurse Attorneys, Educational Conference, 2018.
- ♦ American Academy of Physician Life Care Planners, Annual Assembly, 2018.
- American Association of Nurse Life Care Planners, Education Conference, 2012 2014, 2016, 2018.
- ♦ Juris Education Resource Knowledge for Nurse Consulting, 2017.
- ♦ International Transplant Nurse Society Annual Conference 2017.
- ♦ Summit of International Association of Life Care Planners, 2017.
- ♦ American Rehabilitation Economics Association, Annual Conference 2017.
- ◆ Executive Forum in Lifetime Nurse Care Planning Conference; 2012, 2013, 2015 2017.
- ♦ Bionics and Robotic, Limb Trauma, Biom, 2015.
- ♦ American Society of Pain Management Nursing, 2015.
- ♦ American Association of Legal Nurse Consultants Annual Conference, 2015.
- ♦ International Symposium of Life Care Planners, September 2014.

#### NURSING EXPERIENCE SUMMARY

- ♦ Open Heart Unit
- Home Care Nurse
- ♦ In and Outpatient Surgery Department
- Member of Rapid Response Team and Cardiac Arrest Team
- Nursing Governance Committee Member

- ♦ Intensive Care Unit
- ♦ Emergency Room
- ♦ Hospital Float Nurse
- Clinical Liaison, Electronic Medical Records Implementation
- ◆ Numerous past certifications in advanced life support

### PROFESSIONAL EXPERIENCE

2011-present	Dawn Cook Consulting LLC, Las Vegas, Nevada, USA Expert Witness and Nurse Life Care Planner
2003-2011	Mammoth Hospital, Mammoth Lakes, California, USA Charge Nurse in Peri-Anesthesia Care Unit, managing emergency and scheduled surgical patients, discharge planning, Critical Care Recovery Room. Clinical liaison for Electronic Medical Records initiation, policy writer, form developer. Manager Jaymee Davis. (760) 934-3011
1992-2003	Nanaimo Regional General Hospital, Nanaimo, B.C. Canada Charge nurse, 5 years in 12-bed ICU/CCU, 5 years in Emergency Room, also float to Medical/Surgical floors. Manager Diane Maitland. (250) 755-7690
1991-1995	Yuma Regional Medical Center, Yuma, Arizona USA Seasonal staff RN in 28-bed ICU/CCU for 5 winter seasons. (928) 344-2000
Sep-Nov 1991	Bullhead Community Hospital Travel Nurse Position, 8-bed ICU. Nurse Manger Minni Hawkes. (520) 763-2273
1987-1990	Kuakini Medical Center, Honolulu, Hawaii, USA Charge Nurse in ICU, CCU and Open Heart, 12-week ICU training program for telemetry-trained nurses. Manager Isabel Kang. (808) 536-2236
1983-1986	Holy Family Hospital, Prince Albert, Saskatchewan, Canada Charge Nurse in ICU/CCU and Medical/Surgical floors
1982-1986	Pineland Home Care, Prince Albert, Saskatchewan, Canada Home Care Nurse
1982-1986	Victoria General Hospital, Prince Albert, Saskatchewan, Canada Charge Nurse
Feb-Jun 1982	Ladysmith General Hospital, Ladysmith, BC, Canada In-house registry, 40 bed general hospital.
1979-1981	Cowichan District General Hospital, Duncan BC, Canada Charge Nurse in 12-bed ICU/CCU.
Jan-Aug 1979	Powell River General Hospital, Powell River, BC Canada. Charge Nurse in ICU/CCU.



# Dawn Cook Consulting LLC Dawn L. Cook RN, CNLCP, LNCP-C, CLCP

Nurse Life Care Planner

1001 E Sunset Rd #97553 Las Vegas, NV 89193-7553 702-544-2159 Fax 702-543-7133 Dawn@CookLifeCarePlan.com

#### Fee Schedule 2018

#### Fees

- Retainer\* for Life Care Plans is \$7,500.
- Retainer\* for Rebuttal reports is \$5,000.
- Retainer\* for other projects is \$5,000 or based on the estimated size of the project.
- Expert fee is \$375/hour for the time spent in working on this matter including consultation, case material review, conferences, consultations with law firm, reviewing documents, organizing documents, analysis, responding to discovery requests, travel, site inspection, research, report writing, reading and signing deposition transcripts, local portal-to-portal travel, waiting time, preparing exhibits, preparing demonstrative aids, and preparation time for testifying at deposition, trial, hearing, arbitration or other venues.

#### **Rush Fees**

- Rush rate is \$425/hour for the time spent in working on this matter including consultation, case material review, conferences, consultations with client, reviewing documents, organizing documents, analysis, responding to discovery requests, travel, site inspection, research, report writing, reading and signing deposition transcripts, local portal-to-portal travel, waiting time, preparing exhibits, preparing demonstrative aids, and preparation time for testifying at deposition, trial, hear, arbitration or other venues.
  - o for life care planning reports within 4 weeks from receipt of records
  - o for other reports requested within 2 weeks of receipt of records.

#### **Testimony**

- Expert fee for deposition testimony is \$650 per hour. Testimony may have preparation time, travel time at a rate of \$375/hour, and applicable expenses. If deposition is cancelled within three (3) business days of scheduled date, a \$650 cancellation charge plus travel and/or expenses incurred, if any, will invoiced.
- Expert fee for trial testimony is \$3,000 per day. Testimony may have preparation time, travel time at a rate of \$375/hour, and applicable expenses. These fees are payable two-weeks in *advance* of the trial date. If trial is cancelled within three (3) business days of scheduled date, a \$650 cancellation charge plus travel and/or expenses incurred, if any, will be deducted from the amount and the remainder will be returned to the sender.

#### **Expenses**

- Ground travel per IRS per mile.
- Any air travel, ground transportation and lodging costs are payable in advance or prepaid directly by your law firm.
- Meals and incidental expenses will be billed at cost.
- Firm is responsible for any charges incurred as a result of cancellation of reservations made at the request of your firm.

<sup>\*</sup>The retainer will be credited to the time charged; after the retainer is fully applied, a monthly-itemized statement for services rendered to date will follow as the case progresses.

# Dawn Cook Consulting LLC Dawn L. Cook RN, CNLCP, CLCP

Dawn L. Cook RN, CNLCP, CLCP 1001 E. Sunset Rd.#97553 Las Vegas, NV 89193

# **Four-Year Testimony Log**

Date	Case Name	Case/Docket Number	Court	Deposition or Trial
1/12/2015	Evan Sleight and Robyn Lee Sleight v. Ford Motor Company, Rockaway Car Center Inc., Tim Lamont Whitesides, Rusty's Service LLC	110905721	Second Judicial District Court of Weber County, Ogden Department, UT	Deposition
1/29/2015	Justin Goodman v. James Anthony Clark	09-A-601168	Eighth Judicial District Court, Clark County, NV	Deposition
2/2/2015	Carlos Martinez v. David Sherifi Adbou, Nahed Abdou	A-13-679482-C	District Court, Clark County, NV	Deposition
2/20/2015	Michael C. Linkewitz v. Robert Heath Trucking Inc.	13-CV-420 WPL/SCY	United States District Court, District of New Mexico	Deposition
6/2/2015	Marie Gonzalez v. Deval M. Hatcher, Republic Silver State Disposal Inc.	A-13-687931- C; A-13- 692547-C	District Court, Clark County, NV	Deposition
6/16/2015	Anthony R. Bodine v. David Clay Broadbent	140500155	Fifth Judicial District Court, Washington County, UT	Deposition
6/30/2015	Stephen L. Garber, Jr. and Cindy L. Garber v. MonierLifeTile LLC, Stidham Trucking Inc.	SC CV90 12- 00729	Superior Court of the State of California for the County of Siskiyou	Deposition
8/12/2015	Andres Rivera v. Volvo Cars of North America LLC	13-00397 KG/KBM	Federal Court, Albuquerque, NM	Trial
1/15/2016	Sara Corona v. Absolute Home Care Inc	A-13-693212-C	District Court, Clark County, NV	Deposition
1/26/2016	James J. Whittacre v. Robert J. Tait, MD and Horizon Surgical Center LLC	A14-696438-C	District Court, Clark County, NV	Deposition
2/2/2016	Tova Martin v. Addus Healthcare (Nevada) Inc	A-13-692642-C	District Court, Clark County, NV	Deposition
6/6/2016	Karim Kamal v. USA	CV 15-1585- FMO (JCx)	United States District Court, Central District of California	Deposition
7/8/2016	Briana Brito v. Alta Vista Regional Hospital et al	D-412-CV- 2014-00365	Fourth Judicial District Court, San Miguel County, NM	Deposition
7/25/2016	Helen Sotomayor v. Rahn Sorenson	A-15-716735-C	Eighth Judicial District Court, Clark County, NV	Deposition
8/3/2016	Andrea Minnieweather v. Smith's Food & Drug Centers Inc, et al	A-14-706571-C	District Court, Clark County, NV	Deposition
8/19/2016	Guy R. Dunivan v. Deming Hospital Corp.	D-608-CV- 2015-00031	Sixth Judicial District Court, Grant County, NM	Deposition

 $\begin{array}{c} Page~1~of~3\\ Testimony~Log~last~updated~11/07/18 \end{array}$ 

# Dawn Cook Consulting LLC Dawn L. Cook RN, CNLCP, CLCP

Dawn L. Cook RN, CNLCP, CLCP 1001 E. Sunset Rd.#97553 Las Vegas, NV 89193

Date	Case Name	Case/Docket Number	Court	Deposition or Trial
8/30/2016	Domines v. Vandana Char,	D-1113-CV-	Eleventh Judicial District	Deposition
	MD and Rehoboth McKinley	2012-00482	Court, McKinley County,	
	Christian Hospital		NM	
9/1/2016	Robert Jimenez v. Gexpro,	1-14-CV-	Superior Court of the	Deposition
	Rexel Inc, et al	270931	State of California for the	_
			County of Santa Clara	
10/13/2016	Dora Wisda v. Mercy Hospital	CJ-2013-4163	District Court of	Deposition
	Oklahoma City Inc		Oklahoma County, OK	_
10/31/2016	Paige Rawstron v. North	D-101-CV-	State Court, Santa Fe, NM	Jury Trial
	Valley Ltd. Co.	2015-00347		
11/28/2016	Morris v. Select Air	A-15-712803-C	District Court, Clark	Deposition
, ,	Conditioning, Inc.		County, NV	•
1/03/2017	Lamberth Family v. Clark	2015-17546	United States District	Deposition
, ,	County School District		Court, District of Nevada	1
3/31/2017	James J. Whittacre v. Robert J.	A14-696438-C	District Court, Clark	Trial
0,00,000	Tait, MD and Horizon Surgical		County, NV	
	Center LLC			
6/7/17	Richard Danker v. Old	Unassigned	Superior Court of San	Deposition
0/1/2	Republic Insurance	8	Bernardino County, CA	F
6/21/17	Emily J. Dipo v. Providence	15-2-03873-1	Superior Court of the	Deposition
0/21/17	Health & Services-Washington	10 2 00070 1	State of Washington,	Берознон
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6/23/17	Panje Lynn Gish v. Nth degree	A-15-721882-C	District Court, Clark	Deposition
0/23/17	Targe Lythi Gion V. Tvin degree	71 10 721002 €	County, NV	Берознон
8/30/17	Mea Harris v. Brandon B.	140100342	First Judicial District	Deposition
0/30/17	Schvaneveldt, DDS	110100312	Court, Cache County, UT	Берозион
9/12/17	Eustace De Saint Phalle v.	CIV1501625	Superior Court of the	Deposition
) 12/ 1/	Jeffrey Johnson	C1 V 1001020	State of California, Marin	Deposition
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10/27/17	Lydell Begay v. USA	2015-0358	United States District	Deposition
10/2//1/	Lyden begay v. com	2010 0000	Court, District of New	Берознон
			Mexico	
11/15/17	Tamecia Brown v. Albertson's	2:16-cv-01991-	United States District	Deposition
11/10/17	LLC	JAD-PAL	Court, District of Nevada	Берознон
11/22/17	David D. Karmeli v. The Car	2:15-cy-00486-	United States District	Deposition
11/22/17	Carrier, UI Express Inc., and	BCW	Court, District of Utah	Deposition
	Vladymir Botiuk	DCVV	Court, District of Ctarr	
1/22/18	Hector Landeros v. Pick Your	BCV-17-	Superior Court of the	Deposition
1/22/10	Parts Auto Wrecking	100012	State of California, Kern	Deposition
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1/26/10	Nicolas Rivera v. FirstFleet,	A-15-721970-C	County  District Court, Clark	Donosition
1/26/18	Inc.	A-10-/219/U-C		Deposition
3/6/18		ECU 09738	County, NV	Donosition
3/0/18	Rafael Lara Soto v. MB Corky	ECO 09/38	Superior Court of the	Deposition
	Wycuff, Ruegger & Ruegger,		State of California,	
4/6/10	Inc.	A 16 7000FF C	Imperial County	Danasiii
4/6/18	Araceli Ramirez-Brassetti,	A-16-730355-C	Eighth Judicial District	Deposition
	Orlando Acosta-Ruiz v.		Court, Clark County, NV	
	Temesgen Hagos Zerezghi,			<u> </u>

Page 2 of 3 Testimony Log last updated 11/07/18

# Dawn Cook Consulting LLC Dawn L. Cook RN, CNLCP, CLCP

Dawn L. Cook RN, CNLCP, CLCP 1001 E. Sunset Rd.#97553 Las Vegas, NV 89193

Date	Case Name	Case/Docket Number	Court	Deposition or Trial
	Vegas-Western Cab LLC			
6/15/18	Jennifer A. Livesey vs. Nevada Beverage Co.	A-16-748425-C	District Court, Clark County, NV	Deposition
7/18/18	Robert Harrison vs. Flower Marie Castellon et al.	A-16-740718-C	District Court, Clark County, NV	Deposition
7/19/18	Samantha Hulme vs. Sunrise Hospital and Medical Center, LLC et al.	A-15-724332-C	District Court, Clark County, NV	Deposition
9/5/18 Republic Silver State Disposal, Inc. vs. Andrew M. Cash, M.D. et al.  9/12/18 Michael Brent Bailey vs. R+L Carriers et al.		A-16-738123-C	District Court, Clark County, NV	Deposition
9/12/18		A-17-752450-C	District Court, Clark County, NV	Deposition
9/19/18	Judith K. Simpkins and Robert L. Simpkins vs. Southern Illinois Brain and Spine Center, Nicholas E. Poulos, Hospital Sisters Health System, St. Elizabeth's Hospital of the Hospital Sisters of the Third Order of St. Francis	13-L-183	Twentieth Judicial Circuit Court, St. Clair County, IL	Deposition
10/1/18 Marcy Trujillo and Cornelio Trujillo vs. Lovelace Health Systems, Inc.		D-202-CV- 2017-06198	Second Judicial District Court, Bernalillo County, NM	Deposition
10/22/18	Dawn Anderson vs. Jet Air Delivery	160900575	Third Judicial District Court, Salt Lake County, UT	Deposition
11/07/18	Jacob A. Velazquez and Stephanie Velazquez vs. Shamsher Singh, Judith Lynne Smith, United Express, Inc	34-2016- 00196290-CU- PA-GDS	Superior Court of California, Sacramento County	Deposition

# "EXHIBIT 4(b)"

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MEMO: Farris Medical Bill Review

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# "EXHIBIT 5(a)"

# EXPERT REPORT OF ALAN J. STEIN, M.D. Re: Farris v. Rives, et al Clark County District Court Case No. A-16-739464-C

I am a physician duly licensed to practice medicine in the State of New York. I am Board Certified in Internal Medicine and Infectious Diseases and practice in the New York metropolitan area. I am familiar with the standards of care applicable for the treatment rendered to Titina Farris. I am qualified on the basis of my training, background, knowledge and experience to offer an expert medical opinion regarding those accepted standards of medical care, the breaches thereof in this case, and any resulting injuries and damages arising therefrom.

My opinions are to a reasonable degree of medical probability.

I have been retained as an expert on behalf of the Plaintiff in this matter. I have reviewed medical records and documents concerning the care and treatment provided to Titina Farris including:

- Records of Dr. Rives;
- Records of Dr. Chang;
- Desert Valley Therapy;
- 4. Dr. Hamilton's Records;
- St. Rose Dominican Records and billing;
- Records and billing of Dr. Chaney;
- Records and billing of Advanced Orthopedics and Sports Medicine;
- 8. Records and billing of Care Meridian;
- Records and billing of Dr. Chinn.
- Plaintiff's Complaint with Expert Affidavit of Vincent Pesiri, M.D.;
- Dr. Rives Interrogatory Answers to Interrogatories.

I am conversant with the standard of care in recognizing and treating infections, including sepsis. On July 3, 2015, Barry Rives, M.D. performed a laparoscopic reduction and repair of an incarcerated incisional hernia on Titina Farris at St. Rose Dominican Hospital. Post-operatively Ms. Farris became septic as a result of a perforated colon.

It is my professional opinion, to a reasonable degree of medical probability, that Dr.

Rives deviated from the accepted standard of care in his treatment of Titina Farris and said
deviations caused damage to Titina Farris.

Titina Farris was a type 2 diabetic, obese and had a history of c-sections. On August 7, 2014, Dr. Rives performed an excision of an abdominal wall lipoma and repaired an incarcerated ventral hernia with mesh on Titina Farris.

The abdominal wall hernia recurred.

The records indicate that on July 3, 2015, Dr. Rives performed 1. Laparoscopic reduction and repair of incarcerated incisional hernia with mesh; and 2. Colonorraphy x2." on Titina Farris, a 52 year old female.

The operative report of Dr. Rives stated that the transverse colon was severely stuck and adhered to prior mesh repair. The mesh would not come free from the skin. A small tear was created in the colon using an Endo-GIA blue load. Dr. Rives stapled across the small colotomy. A second small colotomy was also noticeable and was repaired. Dr. Rives noted that after successive firings, the staple lines appeared to be intact. He noted no further serosal or full-thickness injuries to the colon. A piece of mesh was placed in the intrabdominal cavity. The colon was noted to be healthy, viable with no further injuries or tears. The patient was extubated in the OR and noted to be in stable condition.

After the July 3, 2015 surgery, Titina Farris developed abdominal pain, fever of 100.76, glucose of 400-500, an elevated lactate level of 5, and WBC of 18,000. She was transferred to the ICU on July 4, 2015. She continued to deteriorate and developed respiratory failure requiring intubation, atrial fibrillation, fever, leukocytosis, ileus, and sepsis. An Infectious Diseases (ID) consultant who saw the patient on July 4 believed Ms. Farris had fecal peritonitis.

On July 16, 2015, Dr. Elizabeth Hamilton operated on Titina Farris. The procedure performed was: 1. Exploratory laparotomy; 2. Removal of prosthetic mesh and washout of abdomen; 3. Partial colectomy and right ascending colon end ileostomy; 4. Extensive lysis of adhesions over 30 minutes; 5. Retention suture placement; 6. Decompression of the stool from the right colon into the ostomy; The postoperative diagnosis was: 1. Perforated viscus with free intra-abdominal air; 2. Sepsis; 3. Respiratory failure; 4. Anasarca; 5. Fever; 6. Leukocytosis; 7. Fecal disimpaction of the rectum. The operative report also states: "Decision was made that she had evidence of perforation and likely perforation of the colon from the previous colon injuries. A decision was made that it would be in her best interest to take her to the operating room to evaluate this and try to get rid of the source of continued sepsis in this patient, who is failing". The transverse colon was visualized and there was an approximately quarter-size or 2.5 to 3 cm hole. Around it was an active leak of green feculent material and free air. Feculent material was noted on the mesh with 3 cm colotomy in the transverse colon at the staple line.

In this case, to a reasonable degree of medical probability, Dr. Rives fell beneath the accepted standard of care as follows: During the July 3, 2013 surgery, Dr. Rives nicked the bowel in two places. Within twenty four hours, Titina Farris had suspected fecal peritonitis (ID consultant note of 7/4/2015) before she was intubated.

A differential diagnosis was required to assess the cause of sepsis. The symptoms presented could have been bowel leak, pulmonary embolism, or aspiration pneumonia. A chest angio-CT ruled out pulmonary embolism and aspiration pneumonia. By July 6, Titina Farris' heart rate and glucose had come down and the patient was medically stable to undergo reoperation to determine the cause of her infection. Matthew Ripplinger, M.D. gave a second opinion on July 9, 2015. Dr. Ripplinger suspected a bowel leak and stated there should be a fairly low threshold for reoperation.

From 7/4 to 7/16, Titina Farris had a rapid heartbeat in the range of 92-169 and a high WBC in the range of 17-26.7k that did not come down even though she was on antibiotics to suppress the infection. CT scans of the abdomen and pelvis performed on 7/5 and 7/9/2015 were non-diagnostic. However, CT scans are not sensitive to determine sources of intra-abdominal infection early in the post-operative course. The persistent signs of sepsis (fever, elevated WBC, tachycardia, failure to extubate, negative blood and urine cultures), history of two known colonic perforations during recent surgery, an impression of fecal peritonitis from the ID consultant, and a second surgical opinion of a bowel leak, provided enough clinical justification for reoperation to determine and treat the source of infection. Finally, on 7/15/2015, a third CT of the abdomen and pelvis without contrast showed pneumoperitoneum with free fluid in the abdomen, free fluid in the right subphrenic space, and extra luminal gas. This meant that there was a bowel perforation with leakage of bowel contents (feces) into the abdomen. On July 15, 2015 Dr. Rives was concerned about a possible bowel leak or abscess and determined that surgical

The patient's persistent rapid heartbeat, high WBC, and fever were not properly evaluated by Dr. Rives. Considering he was aware that he created two holes in the bowel, Dr. Rives should have immediately suspected a bowel perforation as the likely source of infection. He should have reoperated to rule out a bowel leak as soon as Ms. Farris was medically stable and other obvious causes of post-operative deterioration (pneumonia, urinary tract infection, pulmonary embolism were eliminated. His failure to do so allowed sepsis to progress, resulting in an abdominal catastrophe. Antibiotics merely suppressed the infection; only reoperation and repair of the bowel leak could cure it. Instead, he allowed Ms. Farris to linger with a bowel leak/perforation for eleven days before recommending surgery, at which point she was in critical condition.

The post-operative management of the perforated bowel and resultant sepsis was below the standard of care.

It is my opinion to a reasonable degree of medical probability that the aforesaid breaches of the standard of care by Dr. Barry Rives caused damage to Titina Farris. I reserve the right to supplement this report if more information becomes available.

November

,2018

### CURRICULUM VITAE

Name:	Alan J. Stein, MD
Birth Date: Birth Place: Citizenship: Military Service:	10/11/1946 Philadelphia, PA USA None
Undergraduate:	The City College of New York BS, English, 1968
Medical School:	New York Medical College MD, 1972
Postgraduate:	1972-73 Straight Medical Internship, New York Medical College, Metropolitan Hospital, NY, NY.
	1973-74-Medical Resident, Lenox Hill Hospital, NY, NY
	1974-76- Medical Resident, New York Medical College, Metropolitan Hospital, NY, NY
Fellowship:	1976-78- Infectious Diseases, New York University, NY, NY
Certification:	1976, American Board of Internal Medicine
Certification, continued	1978, Infectious Diseases
	2002, 2003, 2005, American Academy of HIV Medicine

License New York State #116611 DEA# AS5713208 Post-Fellowship: 1978-79--Assistant Professor of Medicine, Downstate Medical Center, 450 Clarkson Avenue, Brooklyn, NY 11203 1979-1991 - Private practice, Internal Medicine & Infectious Diseases: Chief, Infectious Diseases New Rochelle Hospital Medical Center, 16 Guion Place New Rochelle. NY 10801; Chief, Infectious Diseases, Wyckoff Heights Hospital, Brooklyn, NY 1990—Practice limited to Infectious Diseases 1991-1997—Chief, Infectious Diseases, The Brooklyn Hospital Center, 121 Dekalb Ave., Brooklyn, NY 11201 1998 -2013--Private Practice, Infectious Diseases, HIV/AIDS, Hepatitis C, Travel Medicine 5/2013 to Present--AJS Brooklyn Medical Practice, Medical Director, affiliated with the AIDS Healthcare Foundation. Academic Title: 1991-1997--Clinical Associate Professor of Medicine, New York University Current Hospital Affiliations: The Brooklyn Hospital Center—Attending Physician.

Program speaker for Gilead

Pharmaceuticals, AbbVie, Janssen, Merck,

1991to present-- Medical/Legal Case

Reviewer

**Current Activities:** 

Hobbies:

Swimming, classical music, opera, chess, qigong, economics, physics, lifelong NY Yankees fan.

**Publications:** "Netilmicin Therapy of Gentamicin-sensitive and resistant gram negative infection.: The Journal of the Medical Sciences; 282: 2-11, July/August, 1981.

Gombert, M., Goldstein, E., Corrado, M., Stein, A., Butt, K., "Disseminated Mycobacterium Marinum Infection After Renal Transplantation., Annals of Internal Medicine: 94: 486-7, April 1981.

"Diffuse Large Cells Lymphoma of the Liver Treated with Highly Active Antiretroviral Therapy," V. Gotlieb, E. Guevara, A. Stein, A. Nayak, Abstract #2115 American Society of Hematology 43<sup>rd</sup> Annual Meeting, 2001

**Book Chapters**: Infections of Eyes, Ears, Nose, and Throat, pp. 155-168; Urinary Tract Infections, pp. 169-183, in <u>Antibiotics and Infections</u>, Edberg and Berger, editors, Churchill Livingston Publisher, 1983

#### **Studies:**

1990—Participant in Phase IV Study of Intravenous Ciprofloxacin, Wyckoff Heights Hospital.

1992-93 –Participant in CHESS Trial (Centocor HA-1A Efficacy in Septic Shock), The Brooklyn Hospital Center

1998—Participant in CHAMPS1 (Community HIC Anemia Management Protocol Sites)

2001—Participant in PLATO Study.

2003-- Participant in ALOHA Study.

Participant, expanded access trials using Adefovir, Tenofovir, Abacavir, Kaletra.

#### **Society Membership**

1982: Infectious Diseases Society of America

### FEE SCHEDULE

Alan J. Stein, MD

Review of medical records: \$500 per hour

Deposition: \$2,400

Trial Testimony: \$7,000

### Depostions and Court Testimony Alan J. Stein, MD

Year	State	Case	Despositions & Court Testimony
(Approx)			(D/CT)
2013	NY	Antonucci , John	СТ
2013	LA	Zahn, N (deceased) v. Lammico, et.al	D, CT
2013	NJ	Castellano, C vs. Hackensack U. Hospital	СТ
2015	NY	Dischiavi, Gary vs. Calli et al	СТ
2016	KY	Micatrotto vs. Burandt	D
2016	NY	Schrickle vs. Keller	D
2017	IL	Stark, Robert	D
2017	NJ	Tatka vs. Overlook Hospital et.al	D
2017	MD	Miller vs. Sood	D
2017	IN	Gonzles vs. McBride et al.	D
2017	IN	Mahajan Estate vs. Hollingsowrth et. al	D
2018	NJ	Georges vs. Wallmart	D
2018	NY	Georges vs. Wallmart	CT (video)
2018	KY	Micatratto v. Burandt	CT (video)
2018	MD	Miller vs. Sood	СТ
2018	NY	Hassan vs. Foote/Fauser	СТ

# "EXHIBIT 5(b)"

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### National Medical Consultants, P.C.

14-14 Bonnie Lane Bayside, NY 11360

### Invoice

Date	Invoice #
10/21/2019	28771

George F. Hand, Jr., Esq. Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, Nevada 89129

Due upon receipt	FAX#
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Description	Quantity	Rate	Amount
Additional Time on Your Client Titina Farris	8	500.00	4,000.00
by Alan Stein, M.D.			
Review of 8 depositions			
prior to trial			

Make check payable to: National Medical Consultants, P.C.
Tax I.D. # 14-1843204

Total

\$4,000.00

Phone #	Fax #	E-mail
718-423-9167	718-423-9169	medicalconsultants@nyc.rr.com

## "EXHIBIT 6"

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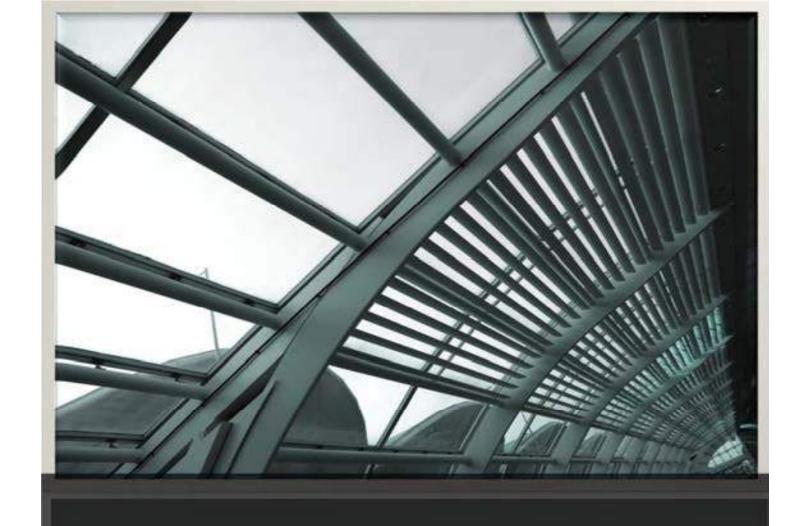
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# "EXHIBIT 7(a)"



# REVISED REPORT ON PRESENT VALUE OF A LIFE CARE PLAN FOR MS. TITINA FARRIS

July 5, 2019

Terrence M. Clauretie, Ph.D.

#### I. ASSIGNMENT

I have been asked by Mr. George Hand to revise my estimate of the present value of a life care plan for Ms. Titina Farris. The earlier report indicated a present value of \$3,463,164. This revision reflects an increase in the hours for companion care and does not account for a change in the date of thi revised report or the interest rates as of July, 2019.

REVISED ESTIMATE OF PRESENT VALUE OF LIFE CARE PLAN: \$4,663,473.

#### II. MATERIALS RELIED ON

For this purpose I have relied on the following material:

- 1. Revised report on life care plan by Ms. Dawn Cook, RN, June 14, 2019,
- 2. Forecast of future growth rate in non-medical labor from the 2018 Annual Report of the Trustees of the OASDI (if applicable),
- 3. Consumer Price Index published by the United States Department of Commerce,
- 4. Life expectancy tables from the United States government,
- 5. Forecast of future medical costs by Trustees of the United States Hospital and Supplementary Insurance Trust Funds, 2018 (for forecast of growth of medical costs) available by clicking on the following link: <a href="https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/ReportsTrustFunds/downloads//tr2015.pdf">https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/ReportsTrustFunds/downloads//tr2015.pdf</a> See Table II.C.1 pp. 10-16 (also attached to this report),
- 6. Interest Rates on United States Treasury Bonds (to replace future costs to present value), available by clicking on the following link: <a href="http://www.treasury.gov/resource-center/data-chart-center/Pages/index.aspx">http://www.treasury.gov/resource-center/data-chart-center/Pages/index.aspx</a>,

#### III. CALCULATIONS

Table one shows the client information in this case. Table two shows the future cost as outlined by Ms. Dawn Cook without a growth rate or discount rate applied. The total for each item in the plan and the total for the plan in table two are identical to the totals in the Cook report (with the exception of the revision for companion care). Table three shows the future costs applying a

3.50% annual growth rate for medical and professional costs. The growth rates in these costs come from items #2 and #5 above. The discount rate is the rate of interest on government bonds that mature in the next twenty-nine years as of October 2018. The present value of the life care plan is \$4,663,473.

**Table One – Client Information** 

Client Name	Titina Farris
Gender	Female
Age	56 (eoy)
Life Expectancy	85

TABLE TWO
COSTS IN 2018 DOLLARS

							\$98,504
	\$17,953	\$13,465	\$1,696	\$33,693	\$7,403	\$22,598	\$1,696
	#1	#2	#3	#4	#5	#6	#7
AGE AT EOY	PM&R	INTERN. MED.	ORTHO	PODIATRY	PSYCHOL.	PSYCHOL.	PLASTIC SURGEON
56	\$155	\$116	\$242	\$2,035	\$64	\$873	\$242
57	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
58	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
59	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
60	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
61	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
62	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
63	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
64	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
65	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
66	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
67	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
68	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
69	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
70	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
71	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
72	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
73	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
74	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
75	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
76	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
77	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
78	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
79	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
80	\$619	\$464	\$242	\$1,131	\$255	\$776	\$242
81	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
82	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
83	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
84	\$619	\$464	\$0	\$1,131	\$255	\$776	\$0
85	\$464	\$348	\$0	\$0	\$191	\$0	\$0

#### **TABLE TWO CONTINUED**

\$8,161	\$6,587	\$7,598	\$68,380	\$7,316	\$24,482	\$679,171
#8	#9	#10	#11	#12	#13	#14
DIETICIAN	PT	PT	PT	ОТ	ОТ	POOL
	EVAL					PROG.
\$281	\$227	\$0	\$0	\$252	\$844	\$0
\$281	\$227	\$3,799	\$0	\$252	\$844	\$17,873
\$281	\$227	\$3,799	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$281	\$227	\$0	\$2,533	\$252	\$844	\$23,831
\$0	\$0	\$0	\$0	\$0	\$0	\$17,873

#### TABLE TWO CONTINUED

		\$1,112,088	\$31,362		\$23,322	\$2,056	\$18,003
\$46,166	\$227,341	\$36,888	\$31,362	\$2,133	\$21,190	\$2,056	\$15,947
#15	#16	#17	#18	#19	#20	#21	#22
MESSAGE	ACCUP.	WOUMD	ER &	MRI	DIAG.	TRIGGER	ARTHRO-
THERAPY	THERAPY	CLINIC	PHYSIC.		OTHER	POINT	SCOPIES
\$873	\$1,960	\$8,973	\$873	\$2,133	\$0	\$343	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$343	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$343	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$15,947
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$343	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$343	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$1,592	\$7,839	\$997	\$1,081	\$0	\$757	\$0	\$0
\$719	\$5,880	\$0	\$208	\$0	\$0	\$343	\$0

#### TABLE TWO CONTINUED

\$59,972			\$2,588,325	\$114,800	\$81,080	
\$59,972	\$2,501,391	\$68,664	\$18,270	\$114,800	\$81,080	\$4,127,456
#23	#24	#25	#26	#27	#28	\$4,127,456
CARPAL	COMPANION	HOME	CASE	DME	HOME	
TUNNEL	CARE	MAIN.	MNGMT.		MOD.	
\$0	\$9,809	\$592	\$630	\$3,827	\$81,080	\$116,424
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$84,850
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$93,341
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$89,542
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$90,026
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$89,542
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$89,884
\$0	\$39,238	\$2,368	\$630	\$3,827	\$0	\$89,542
\$0	\$51,009	\$2,368	\$630	\$3,827	\$0	\$101,798
\$0	\$54,933	\$2,368	\$630	\$3,827	\$0	\$105,237
\$0	\$54,933	\$2,368	\$630	\$3,827	\$0	\$105,237
\$0	\$54,933	\$2,368	\$630	\$3,827	\$0	\$105,237
\$0	\$54,933	\$2,368	\$630	\$3,827	\$0	\$106,064
\$59,972	\$66,704	\$2,368	\$630	\$3,827	\$0	\$192,927
\$0	\$78,475	\$2,368	\$630	\$3,827	\$0	\$128,779
\$0	\$78,475	\$2,368	\$630	\$3,827	\$0	\$128,779
\$0	\$78,475	\$2,368	\$630	\$3,827	\$0	\$129,264
\$0	\$78,475	\$2,368	\$630	\$3,827	\$0	\$128,779
\$0	\$78,475	\$2,368	\$630	\$3,827	\$0	\$129,122
\$0	\$109,865	\$2,368	\$630	\$3,827	\$0	\$160,169
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$192,044
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$192,386
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$141,255	\$2,368	\$630	\$3,827	\$0	\$191,559
\$0	\$105,941	\$1,776	\$0	\$3,827	\$0	\$137,570

#### TABLE THREE

GROWTH		3.50%	3.50%	3.50%	3.50%	3,50%	3,50%	3.50%
GINOWIII		#1	#2	#3	#4	#5	#6	#7
AG	E	PM&R	#Z INTERN.	#3 ORTHO	PODIATRY	PSYCHOL.	PSYCHOL.	#1 PLASTIC
YEAR	_	FINION	MED.	OKTHO	FODIATRI	F31CHOL.	FSTCHOL.	SURGEON
2018	56	\$155	\$116	\$242	\$2,035	\$64	\$873	\$242
2019	57	\$641	\$481	\$0	\$1,170	\$264	\$803	\$0
2019	58	\$663	\$497	\$0 \$0	\$1,170	\$204	\$831	\$0 \$0
2020	59	\$686	\$497 \$515	\$0 \$0	\$1,211	\$273 \$283	\$860	\$0 \$0
2021	60	\$710	\$533	\$278	\$1,297	\$203 \$293	\$890	\$278
2022	61	\$710 \$735	\$555 \$551	\$0	\$1,343	\$303	\$922	\$0
2023	62	\$761	\$551 \$571	\$0 \$0	\$1,343	\$303 \$314	\$954	\$0 \$0
2024	63	\$788	\$57 1 \$591	\$0 \$0	\$1,439	\$325	\$987	\$0 \$0
2025	64	\$815	\$611	\$319	\$1,439	\$336	\$1,022	\$319
2020	65	\$844	\$633	\$0	\$1,541	\$348	\$1,022	\$0
2027	66	\$873	\$655	\$0 \$0	\$1,595	\$360	\$1,03 <i>1</i> \$1,094	\$0 \$0
2020	67	\$904	\$678	\$0 \$0	\$1,651	\$373	\$1,094	\$0 \$0
2029	68	\$935	\$702	\$366	\$1,708	\$373 \$386	\$1,133 \$1,172	\$366
2030	69	\$968	\$702 \$726	\$300	\$1,768	\$399	\$1,172	\$300 \$0
2031	70	\$1,002	\$720 \$752	\$0 \$0	\$1,700	\$413	\$1,213	\$0 \$0
2032	71	\$1,002	\$732 \$778	\$0 \$0	\$1,894	\$428	\$1,230	\$0 \$0
2033	72	\$1,037	\$805	\$420	\$1,961	\$443	\$1,345	\$420
2034	73	\$1,073 \$1,111	\$833	\$420	\$2,029	\$458	\$1,343	\$420
2036	73 74	\$1,111 \$1,150	\$862	\$0 \$0	\$2,029	\$474	\$1,392 \$1,441	\$0 \$0
2030	7 <del>4</del> 75	\$1,130	\$893	\$0 \$0	\$2,100	\$491	\$1,441 \$1,492	\$0 \$0
2037	75 76	\$1,190	\$924	\$482	\$2,174	\$508	\$1,492	\$482
2039	70 77	\$1,232 \$1,275	\$956	\$402 \$0	\$2,230	\$506 \$526	\$1,544	\$402 \$0
2039	78	\$1,273	\$990	\$0 \$0	\$2,320	\$544	\$1,596 \$1,654	\$0 \$0
2040	78 79	\$1,320 \$1,366	\$1,024	\$0 \$0	\$2,410	\$563	\$1,054	\$0 \$0
2041	80	\$1,300 \$1,414	\$1,02 <del>4</del> \$1,060	\$553	\$2,494	\$583	\$1,772	\$553
2042	81	\$1,414 \$1,463	\$1,000	\$000 \$0	\$2,562	\$603	\$1,772	\$000 \$0
2043	82	\$1, <del>4</del> 03 \$1,514	\$1,0 <i>91</i> \$1,136	\$0 \$0	\$2,766	\$624	\$1,898	\$0 \$0
2044	83	\$1,51 <del>4</del> \$1,567	\$1,130 \$1,175	\$0 \$0	\$2,760	\$646	\$1,090 \$1,964	\$0 \$0
2045	აა 84	\$1,567 \$1,622	\$1,175 \$1,217	\$0 \$0	\$2,062	\$669	\$2,033	\$0 \$0
2046	85		\$1,217 \$944	\$0 \$0	\$2,962	\$669 \$519	\$2,033 \$0	эо \$0
2U41	00	\$1,259	Ф944	ΦΟ	φU	\$518	\$0	φU

#### TABLE THREE CONTINUED

INDLL	inice o					
3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%
#8	#9	#10	#11	#12	#13	#14
DIETICIAN	PT	PT	PT	ОТ	OT	POOL
	EVAL					PROG.
\$281	\$227	\$0	\$0	\$252	\$844	\$0
\$291	\$235	\$3,932	\$0	\$261	\$874	\$18,499
\$301	\$243	\$4,069	\$2,713	\$270	\$904	\$25,528
\$312	\$252	\$0	\$2,808	\$280	\$936	\$26,421
\$323	\$261	\$0	\$2,906	\$289	\$969	\$27,346
\$334	\$270	\$0	\$3,008	\$300	\$1,003	\$28,303
\$346	\$279	\$0	\$3,113	\$310	\$1,038	\$29,294
\$358	\$289	\$0	\$3,222	\$321	\$1,074	\$30,319
\$371	\$299	\$0	\$3,335	\$332	\$1,112	\$31,380
\$384	\$310	\$0	\$3,452	\$344	\$1,151	\$32,479
\$397	\$320	\$0	\$3,572	\$356	\$1,191	\$33,615
\$411	\$332	\$0	\$3,698	\$368	\$1,233	\$34,792
\$425	\$343	\$0	\$3,827	\$381	\$1,276	\$36,010
\$440	\$355	\$0	\$3,961	\$395	\$1,320	\$37,270
\$456	\$368	\$0	\$4,100	\$408	\$1,367	\$38,574
\$471	\$381	\$0	\$4,243	\$423	\$1,414	\$39,925
\$488	\$394	\$0	\$4,391	\$437	\$1,464	\$41,322
\$505	\$408	\$0	\$4,545	\$453	\$1,515	\$42,768
\$523	\$422	\$0	\$4,704	\$469	\$1,568	\$44,265
\$541	\$437	\$0	\$4,869	\$485	\$1,623	\$45,814
\$560	\$452	\$0	\$5,039	\$502	\$1,680	\$47,418
\$580	\$468	\$0	\$5,216	\$520	\$1,739	\$49,077
\$600	\$484	\$0	\$5,398	\$538	\$1,799	\$50,795
\$621	\$501	\$0	\$5,587	\$557	\$1,862	\$52,573
\$643	\$519	\$0	\$5,783	\$576	\$1,928	\$54,413
\$665	\$537	\$0	\$5,985	\$596	\$1,995	\$56,317
\$688	\$556	\$0	\$6,195	\$617	\$2,065	\$58,289
\$712	\$575	\$0	\$6,411	\$639	\$2,137	\$60,329
\$737	\$595	\$0	\$6,636	\$661	\$2,212	\$62,440
\$0	\$0	\$0	\$0	\$0	\$0	\$48,469

#### TABLE THREE CONTINUED

IADEL IIII	LL CONT	MOLD					
3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%
#15	#16	#17	#18	#19	#20	#21	#22
MESSAGE	ACCUP.	WOUMD	ER &	MRI	DIAG.	TRIGGER	ARTHRO-
THERAPY	THERAPY	CLINIC	PHYSIC.		OTHER	POINT	SCOPIES
\$873	\$1,960	\$8,973	\$873	\$2,133	\$0	\$343	\$0
\$1,648	\$8,114	\$1,032	\$1,119	\$0	\$783	\$0	\$0
\$1,705	\$8,398	\$1,068	\$1,158	\$0	\$811	\$0	\$0
\$1,765	\$8,692	\$1,105	\$1,199	\$0	\$839	\$0	\$0
\$1,827	\$8,996	\$1,144	\$1,241	\$0	\$868	\$0	\$0
\$1,891	\$9,311	\$1,184	\$1,284	\$0	\$899	\$0	\$0
\$1,957	\$9,637	\$1,226	\$1,329	\$0	\$930	\$421	\$0
\$2,025	\$9,974	\$1,268	\$1,376	\$0	\$963	\$0	\$0
\$2,096	\$10,323	\$1,313	\$1,424	\$0	\$997	\$0	\$0
\$2,170	\$10,684	\$1,359	\$1,474	\$0	\$1,031	\$0	\$0
\$2,246	\$11,058	\$1,406	\$1,526	\$0	\$1,068	\$0	\$0
\$2,324	\$11,445	\$1,456	\$1,579	\$0	\$1,105	\$0	\$0
\$2,406	\$11,846	\$1,506	\$1,634	\$0	\$1,144	\$518	\$0
\$2,490	\$12,260	\$1,559	\$1,691	\$0	\$1,184	\$0	\$24,940
\$2,577	\$12,690	\$1,614	\$1,751	\$0	\$1,225	\$0	\$0
\$2,667	\$13,134	\$1,670	\$1,812	\$0	\$1,268	\$0	\$0
\$2,760	\$13,593	\$1,729	\$1,875	\$0	\$1,312	\$0	\$0
\$2,857	\$14,069	\$1,789	\$1,941	\$0	\$1,358	\$0	\$0
\$2,957	\$14,562	\$1,852	\$2,009	\$0	\$1,406	\$637	\$0
\$3,060	\$15,071	\$1,917	\$2,079	\$0	\$1,455	\$0	\$0
\$3,168	\$15,599	\$1,984	\$2,152	\$0	\$1,506	\$0	\$0
\$3,278	\$16,145	\$2,053	\$2,227	\$0	\$1,559	\$0	\$0
\$3,393	\$16,710	\$2,125	\$2,305	\$0	\$1,613	\$0	\$0
\$3,512	\$17,295	\$2,199	\$2,386	\$0	\$1,670	\$0	\$0
\$3,635	\$17,900	\$2,276	\$2,469	\$0	\$1,728	\$783	\$0
\$3,762	\$18,526	\$2,356	\$2,556	\$0	\$1,788	\$0	\$0
\$3,894	\$19,175	\$2,439	\$2,645	\$0	\$1,851	\$0	\$0
\$4,030	\$19,846	\$2,524	\$2,738	\$0	\$1,916	\$0	\$0
\$4,171	\$20,540	\$2,612	\$2,834	\$0	\$1,983	\$0	\$0
\$1,950	\$15,945	\$0	\$564	\$0	\$0	\$929	\$0

#### TABLE THREE CONTINUED

3.50%	3.50%	3.50%	3.50%	2.80%	2.80%	\$7,613,103		\$4,663,473
#23	#24	#25	#26	#27	#28	TOTAL	DISC.	PRESENT
CARPAL	COMPANION	HOME	CASE	DME	HOME		RATE	VALUE
TUNNEL	CARE	MAIN.	MNGMT.		MOD.			
\$0	\$9,809	\$592	\$630	\$3,827	\$81,080	\$116,424	0.00%	\$116,424
\$0	\$40,611	\$2,451	\$652	\$3,934	\$0	\$87,793	2.41%	\$85,727
\$0	\$42,032	\$2,536	\$675	\$4,044	\$0	\$99,934	2.33%	\$95,434
\$0	\$43,503	\$2,625	\$698	\$4,157	\$0	\$99,191	2.30%	\$92,650
\$0	\$45,026	\$2,717	\$723	\$4,274	\$0	\$103,190	2.31%	\$94,181
\$0	\$46,602	\$2,812	\$748	\$4,393	\$0	\$106,196	2.33%	\$94,644
\$0	\$48,233	\$2,911	\$774	\$4,516	\$0	\$110,303	2.39%	\$95,729
\$0	\$49,921	\$3,012	\$802	\$4,643	\$0	\$113,696	2.43%	\$96,107
\$0	\$67,169	\$3,118	\$830	\$4,773	\$0	\$133,782	2.47%	\$110,058
\$0	\$74,867	\$3,227	\$859	\$4,906	\$0	\$143,118	2.50%	\$114,598
\$0	\$77,488	\$3,340	\$889	\$5,044	\$0	\$148,093	2.54%	\$115,239
\$0	\$80,200	\$3,457	\$920	\$5,185	\$0	\$153,241	2.52%	\$116,541
\$0	\$83,007	\$3,578	\$952	\$5,330	\$0	\$159,818	2.54%	\$118,278
\$93,794	\$104,322	\$3,703	\$985	\$5,479	\$0	\$301,224	2.56%	\$216,858
\$0	\$127,027	\$3,833	\$1,020	\$5,633	\$0	\$207,893	2.60%	\$145,136
\$0	\$131,473	\$3,967	\$1,055	\$5,791	\$0	\$215,130	2.62%	\$145,955
\$0	\$136,075	\$4,106	\$1,092	\$5,953	\$0	\$223,459	2.64%	\$147,276
\$0	\$140,837	\$4,249	\$1,131	\$6,119	\$0	\$230,369	2.66%	\$147,435
\$0	\$145,766	\$4,398	\$1,170	\$6,291	\$0	\$239,025	2.69%	\$148,230
\$0	\$211,216	\$4,552	\$1,211	\$6,467	\$0	\$307,036	2.72%	\$184,393
\$0	\$281,068	\$4,711	\$1,254	\$6,648	\$0	\$381,160	2.75%	\$221,550
\$0	\$290,905	\$4,876	\$1,297	\$6,834	\$0	\$393,456	2.74%	\$223,031
\$0	\$301,087	\$5,047	\$1,343	\$7,025	\$0	\$407,179	2.76%	\$223,695
\$0	\$311,625	\$5,223	\$1,390	\$7,222	\$0	\$421,382	2.78%	\$224,273
\$0	\$322,532	\$5,406	\$1,438	\$7,424	\$0	\$437,968	2.80%	\$225,740
\$0	\$333,820	\$5,596	\$1,489	\$7,632	\$0	\$451,290	2.82%	\$225,173
\$0	\$345,504	\$5,791	\$1,541	\$7,846	\$0	\$467,032	2.84%	\$225,493
\$0	\$357,597	\$5,994	\$1,595	\$8,066	\$0	\$483,323	2.86%	\$225,726
\$0	\$370,112	\$6,204	\$1,651	\$8,291	\$0	\$500,183	2.88%	\$225,872
\$0	\$287,300	\$4,816	\$0	\$8,524	\$0	\$371,219	2.90%	\$162,026

#### IV. COMPENSATION

My charges are \$350 per hour for non-testimony work and \$450 per hour for all testimony. I have allocated one hour to this updated report.

#### V. ATTACHMENTS

In addition to the materials relied upon I have attached or previously provided the following:

- 1. Curriculum Vitae
- 2. Testimony history
- 3. Invoice

Respectfully Submitted,

Terrence M. Clauretie, PH.D.

Terrence M. Clauretie

# **OCTOBER 2018 INTERST RATES**



## MEDICAL AND PROFESSIONAL COSTS GROWTH RATES

Table II.C1.—Long-Range Values<sup>a</sup> of Key Assumptions for the 75-year Projection Period

Long-range assumptions	Intermediate	Low-cost	High-cost
Demographic:			
Total fertility rate (children per woman), for 2032 and later	2.0	2.2	1.8
Average annual percentage reduction in total age-sex-adjusted death rates from 2015 to 2090	.78	.42	1.16
to 2090	1,291	1,629	961
Economic:			
Average annual percentage change in:			
Productivity (total U.S. economy), for 2026 and later	1.68	1.98	1.38
Average wage in covered employment from 2026 to 2090	3.80	5.03	2.59
Consumer Price Index (CPI-W), for 2019 and later.  Average annual real-wage differential (percent) for 2026	2.60	3.20	2.00
to 2090	1.20	1.83	.59
later	5.5	4.5	6.5
Annual trust fund real interest rate (percent), for 2026 and later.	2.7	3.2	2.2
Programmatic:			
Disability incidence rate (per 1,000 exposed, age-sex-adjusted)			
in 2090	5.4	4.3	6.4
Disability recovery rate (per 1,000 beneficiaries, age-sex- adjusted) in 2090.	10.4	12.6	8.3

<sup>&</sup>lt;sup>a</sup> See chapter V for details, including historical and projected values.

Table IV.B1.—Components of Increases in Total Allowed Charges per Fee-for-Service Enrollee for Practitioner Services

(In percent)

		Physician fee schedule			_				
Calendar year	MEI	Physician update			Total increase <sup>2</sup>	CPI	DME	Lab	Other
Aged:									
2007	2.1%	0.0%	-1.4%	3.5%	2.1%	2.9%	2.9%	9.8%	4.7%
2008	1.8	0.5	-0.3	4.0	3.7	4.1	6.4	7.3	4.2
2009	1.6	1.1	1.4	1.6	3.0	-0.7	-7.4	8.4	7.9
2010	1.2	1.33	2.3	1.6	3.9	2.1	1.2	1.4	3.3
2011	0.4	0.9	0.8	2.3	3.1	3.6	-3.7	-2.8	4.4
2012	0.6	0.0	-1.2	1.0	-0.3	2.1	0.7	6.4	3.2
2013	0.8	0.0	-0.1	0.2	0.1	1.4	-10.4	0.1	2.6
2014	0.8	0.5	0.5	0.6	1.2	1.5	-14.3	6.4	2.6
2015	0.8	0.2"	-0.5	0.7	0.2	-0.4	6.7	2.6	4.4
2016	1.1	0.8	-0.4	-0.2	-0.6	1.0	-5.8	-2.5	7.2
2017	1.2	0.5	0.1	1.5	1.6	2.2	-5.7	6.0 <sup>6</sup>	4.1
2018	1.8	0.5	-0.5	2.0	1.6	3.0	4.9	-0.8	2.9
2019	3.0	0.5	0.9	4.0°	4.9	2.6	11.3	5.1	4.0
2020	2.8	0.0	0.3	3.1	3.4	2.6	5.5	5.3	4.5
2021	2.6	0.0	0.1	3.4	3.5	2.6	5.5	13.8	4.3
2022	2.6	0.0	0.1	3.5	3.7	2.6	5.3	5.2	4.5
2023	2.4	0.0	0.1	3.5	3.7	2.6	5.3	5.2	3.8
2024	2.3	0.0	0.0	3.5	3.5	2.6	5.3	13.6	5.6
2025	22	0.0	0.0	1.0	1.0	2.6	5.3	5.2	4.7
2026	2.2	0.6	0.1	3.6	3.8	2.6	5.2	5.2	4.7
Disabled (e		ESRD):							
2007	2.1	0.0	-1.4	1.7	0.3	2.9	2.2	10.4	4.1
2008	1.8	0.5	-0.3	3.7	3.4	4.1	6.3	11.8	8.7
2009	1.6	1.1	1.4	4.5	5.9	-0.7	-2.4	21.0	9.7
2010	1.2	1.31	2.3	2.6	4.9	2,1	1,4	-4.3	2.8
2011	0.4	0.9	0.8	1.9	2.7	3.6	-3.0	6.4	3.4
2012	0.6	0.0	-1.2	2.1	0.9	2.1	1.0	24.7	1.9
2013	0.8	0.0	-0.1	1.3	1.2	1.4	-9.5	10.6	1.2
2014	0.8	0.5	0.5	1.B	2.3	1.5	-11.2	13.4	4.1
2015	0.8	0.2"	-0.5	0.4	-0.2	-0.4	7.2	5.9	6.2
2016	1.1	0.8	-0.4	0.4	0.0	1.0	-4.0	-12.9	8.7
2017	1.2	0.5	0.1	1.3	1.4	2.2	-6.0	5.75	4.1
2018	1.8	0.5	-0.5	1.9	1.5	3.0	4.7	-0.8	3.1
2019	3.0	0.5	0.9	4.0 <sup>k</sup>	4.9	2.6	11.2	5.1	4.0
2020	2.8	0.0	0.3	3.1	3.4	2.6	5.5	5.3	4.7
2021	2.6	0.0	0.1	3.3	3.5	2.6	5.4	13.8	4.5
2022	2.6	0.0	0.1	3.4	3.5	2.6	5.2	5.0	4.5
2023	2.4	0.0	0.1	3.3	3.5	2.6	5.2	5.0	3.6
2024	2.3	0.0	0.0	3.4	3.4	2.6	5.1	13.4	5.7
2025	2.2	0.0	0.0	0.8	0.8	2.6	5.1	5.0	4.7
2026	2.2	0.6	0.1	3.4	3.6	2.6	5.1	5.0	4.6

Reflects the physician update and all legislation affecting physician services—for example, the addition of new preventative services enacted in 1997, 2000, and 2010.

<sup>&</sup>lt;sup>2</sup>Equals combined increases in the modified update and residual factors.

<sup>&</sup>lt;sup>3</sup>A physician payment price change occurred on June 1, 2010.

A physician payment price change occurred on July 1, 2015.

<sup>\*</sup>Beginning in 2018, payments under the laboratory fee schedule will no longer include an adjustment for economy-wide productivity. Instead, payments will reflect a survey of private sector lab payments and will be updated every 3 years.

<sup>\*</sup>For 2019-2024, physicians in an advanced APM will receive an incentive payment amounting to 5 percent of their Medicare payments for the year. For those same years, a total of \$500 million is available for additional payment adjustment under the merit-based incentive payment system (MIPS) for certain high-performing physicians.

## Supplementary Medical Insurance

Table IV.B8.—Key Factors for Part D Expenditure Estimates

Calendar year	National health expenditure (NHE) drug trend <sup>2</sup>	Part D per capital cost trend?	Manufacturer rebates*	Plan administrative expenses and profits*
Historical data:			70.55 (III.)	
2007	4.2%	1.4%	9.6%	13.6%
2008	1.5	3.8	10.4	13.2
2009	3.8	2.9	11.1	12.7
2010	-0.7	1.3	11.3	13.6
2011	1.5	3.7	11.5	13.1
2012	-0.6	-1.8	11.7	12.1
2013	1.6	2.6	12.9	12.2
2014	11.5	10.9	14.3	11.9
2015	8.1	8.3	18.2	11.6
Intermediate estima	nes:	No.		
2016	4.1	2.5	22.0	12.0
2017	4.8	3.5	23.8	10.7
2018	6.6	6.7	24.0	11.6
2019	5.4	6.1	24.1	11.3
2020	5.3	5.9	24.3	11.3
2021	5.4	5.6	24.5	11.2
2022	5.5	5.2	24.7	11.1
2023	5.4	5.2	24.9	11.1
2024	5.4	5.1	25.0	11.0
2025	5.4	4.1	25.0	11.0
2026	5.4	5.2	25.0	10.9

<sup>2028 5.4 5.2 25.0 10.9</sup>These factors do not reflect the impact of the sequestration for 2013-2025.

On February 15, 2017, the CMS Office of the Actuary published the NHE projections through calendar year 2025; for 2026, the drug trend is the same as was used in 2025.

Youses reflect ACA add-on and other taw changes.

Expressed as a percentage of total drug costs.

Expressed as a percentage of total gross plan benefit payments, which include plan benefits and administrative expenses with profits.

### Medicare Assumptions

Table II.C1.—Key Assumptions, 2041-2091

- Underwater of Contraduction	Intermediate	Low-Cost	High-Cost
Economic			
Annual percentage change in:			
Gross Domestic Product (GDP) per capita1	3.9	5.0	2.7
Average wage in covered employment	3.8	5.0	2.6
Private nonfarm business multifactor productivity <sup>2</sup>	1.1	-	
Consumer Price Index (CPI)	2.6	3.2	2.0
Real-wage differential (percent)	1.2	1.8	0.6
Real interest rate (percent)	2.7	3.2	2.2
Demographic:			
Total fertility rate (children per woman)	2.00	2.20	1.80
Annual percentage reduction in total age-sex adjusted death rates	0.72	0.41	1.03
Net annual immigration	1,245,000	1,570,000	955,000
lealth cost growth:		5-70-000-000	
Annual percentage change in per beneficiary			
Medicare expenditures (excluding demographic			
impacts)1			
HI (Part A)	3.7		
SMI Part B	3.6		3
SMI Part D	4.5		
Total Medicare	3.7	3	

Total Medicare. 3.7

The assumed ultimate increases in per capita GDP and per beneficiary Medicare expenditures can also be expressed in real terms, adjusted to remove the impact of assumed inflation. When adjusted by the chain-weighted GDP price index, assumed real per capita GDP growth under the intermediate assumptions is 1.8 percent, and real per beneficiary Medicare cost growth is 1.5 percent, 1.3 percent, and 2.3 percent for Parts A. B. and D. respectively.

<sup>2.3</sup> percent for Parts A, B, and D, respectively.
\*Private nonfarm business multifactor productivity is published by the Bureau of Labor Statistics and is used as the economy-wide private nonfarm business multifactor productivity to adjust certain provider payment updates.

payment updates.
\*See section III.B3 for further explanation of the Part A alternative (low-cost and high-cost) assumptions.
Long-range afternative projections are not prepared for Parts B and D.

# ORIGINAL COST ESTIMATES FROM THE COOK REPORT HOME CARE IS NOW \$2,501,391

Total I	ifetime Costs
CATEGORY	LIFETIME CHARGES
Medical Care	\$98,503.98
Allied Health	\$1,112,088.31
Complications	\$31,362.20
Diagnostics	\$23,322.20
Procedures	\$77,975.10
Home Care	\$1,562,263.83
Equipment	\$114,799.71
Home Modifications	\$81,080.00
Total:	\$3,101,395.33

# "EXHIBIT 7(b)"

CHECK DATE DESCRIPTION INVOICE # AMOUNT DEDUCTION NET AMOUNT

CLAURETIE, TERRENCE 10/19/18

1,575.00

1,575.00

CHECK DATE 2737 10/19/18

CONTROL NUMBER

TOTALS F Gross:

1,575.00

0.00 Net:

1,575.00

HAND & SULLIVAN, LLC

OPERATING ACCOUNT 3442 N BUFFALO DR LAS VEGAS, NV 89129

FIRST SAVINGS BANK 78-683/914

Ded:

2737

10/19/18

\*\*\$1,575.00

PAY

\*\*\* ONE THOUSAND FIVE HUNDRED SEVENTY-FIVE & 00/100 DOLLARS

TO THE CLAURETIE. TERRENCE ORDER

OF:

MEMO: Farris

#002737# #1

HAND & SULLIVAN, LLC- OPERATING ACCOUNT FSB

2737

# "EXHIBIT 8"

Electronically Filed 1/21/2020 10:52 PM Steven D. Grierson CLERK OF THE COURT

**SUPP** 1 KIMBALL JONES, ESQ. Nevada Bar No.: 12982 JACOB G. LEAVITT, ESQ. 3 Nevada Bar No.: 12608 **BIGHORN LAW** 4 716 S. Jones Blvd. 5 Las Vegas, Nevada 89107 Phone: (702) 333-1111 6 Email: Kimball@BighornLaw.com Jacob@BighornLaw.com 7 8 GEORGE F. HAND, ESQ. Nevada Bar No.: 8483 HAND & SULLIVAN, LLC 3442 N. Buffalo Drive 10 Las Vegas, Nevada 89129 Phone: (702) 656-5814 11 Email: GHand@HandSullivan.com 12 Attorneys for Plaintiffs 13 **DISTRICT COURT** 14 **CLARK COUNTY, NEVADA** 15 TITINA FARRIS and PATRICK FARRIS, 16 CASE NO.: A-16-739464-C Plaintiffs, DEPT. NO.: XXXI 17 VS. 18 M.D.; LAPAROSCOPIC BARRY RIVES, 19 SURGERY OF NEVADA, LLC et al., 20 Defendants. 21 PLAINTIFFS' SUPPLEMENTAL VERIFIED MEMORANDUM OF COSTS AND 22 **DISBURSEMENTS** 23 Pursuant to N.R.S. 18.005, 18.020, N.R.S. 18.110 and N.R.C.P. 68, Plaintiffs PATRICK 24 FARRIS and TITINA FARRIS, by and through their attorney of record, KIMBALL JONES, ESQ. 25 and JACOB G. LEAVITT, ESQ., with the Law Offices of BIGHORN LAW and GEORGE F. 26 27 HAND, ESQ., with the Law Offices of HAND & SULLIVAN, LLC, hereby move this Court to 28 recover their costs of suit. The costs were actually incurred and are reasonable in amount.

Page 1 of 13

Case Number: A-16-739464-C

Plaintiffs are entitled to recovery statutory interest on the above costs from date the cost was incurred through the date of Entry of Judgment pursuant to N.R.S. 17.130 and *Gibellini v. Klindt*, 110 Nev. 1201, 885 P.2d 540 (1994). For purposes of calculation of prejudgment interest, the actual date or latest date each reasonable cost was incurred is set forth. Further, Plaintiffs are entitled to post-judgment interest at the statutory rate from the date of Entry of Judgment.

### BIGHORN LAW MEMORANDUM OF COSTS AND DISBURSEMENTS

Clark County Treasurer (Video Recordings from Vickie Center v Barry Rives) (Bates Stamped 0002 through 0003)	\$8.00
Bruce T. Adornato, MD (Expert Deposition Fee) (Bates Stamped 0004 through 0005)	\$1,750.00
Kim S. Erlich, MD (Expert Deposition Fee) (Bates Stamped 0006)	\$2,500.00
Copies, Facsimiles, Runner, Phone Charges, etc.	\$350.00
National Medical Consultants, P.C. (Invoice No.: 27849 - Deposition Prep of Expert Alan Stein, M.D.) (Bates Stamped 0007 through 0008)	\$4,710.00
Planet Depos, LLC (Invoice No.: 289944 - Deposition of Bruce Adornato, M.D., Video Portion) (Bates Stamped 0009 through 0010)	\$1,005.00
Planet Depos, LLC (Invoice No.: 289932 - Deposition Transcript of Kim Steven Erlich, M.D.) (Bates Stamped 0011 through 0012)	\$828.80
Planet Depos, LLC (Invoice No.: 289943 - Deposition of Kim Steven Erlich, M.D., Video Portion) (Bates Stamped 0013 through 0014)	\$830.00
National Medical Consultants, P.C. (Invoice No.: 28475 - Deposition Prep of Expert Michael Hurwitz, M.D.) (Bates Stamped 0015 through 0016)	\$1,500.00
Planet Depos, LLC (Invoice No.: 289927 - Deposition Transcript of Bruce Adornato, M.D.) (Bates Stamped 0017 through 0018)	\$1,390.99
National Medical Consultants, P.C. (Invoice No.: 27498 - Deposition Prep of Expert Justin Willer, M.D.) (Bates Stamped 0019 through 0020)	\$3,250.00
Planet Depos, LLC (Invoice No.: 290970 - Deposition of Lance Stone, D.O., Video Portion) (Bates Stamped 0021 through 0022)	\$775.00

1 2	Planet Depos, LLC (Invoice No.: 290767 - Deposition Transcript of Lance Stone, D.O.) (Bates Stamped 0023 through 0024)	\$671.32
3 4	Legal Wings (Invoice No.: R-1908919.0101 - Rush Court Run to Deliver Documents to Kimball) (Bates Stamped 0025 through 0026)	\$10.00
5	Litigation Services and Technologies of California, LLC (Invoice No.: 1337228 - Deposition Transcript of Michael B. Hurwitz, M.D.) (Bates Stamped 0027 through 0028)	\$758.05
7 8	Legal Wings (Invoice No.: R-1910077.01 - ROC of Motion to Strike on OST to Defense) (Bates Stamped 0029 through 0030)	\$95.00
9	DALOS Legal Services (Invoice No.: 250974 - Trial Exhibit Binders) (Bates Stamped 0031 through 0032)	\$809.88
10 11 12	Legal Wings (Invoice No.: R-1911808.01 - Runner Service - Filing and ROC of Plaintiffs' Motion to Strike Trial Briefs on OST) (Bates Stamped 0033 through 0034)	\$80.00
13 14	Legal Wings (Invoice No.: P-1911696.01 - Process Serve of Trial Subpoena on the COR for St. Rose Siena) (Bates Stamped 0035 through 0036)	\$209.00
15 16 17	Legal Wings (Invoice No.: P-1911097.01 - Process Serve of Trial Subpoena on Mary Jane Langan) (Bates Stamped 0037 through 0038)	\$180.00
18 19	Legal Wings (Invoice No.: P-1911694.01 - Process Serve of Trial Subpoena on the COR for Care Meridian) (Bates Stamped 0039 through 0040)	\$204.00
20 21	Dawn Cook Consulting, LLC (Invoice No.: 938 - Trial Testimony for Dawn Cook) (Bates Stamped 0041 through 0042)	\$3,000.00
22 23	Legal Wings (Invoice P-1911162.01 - Process Serve of Trial Subpoena on Bess Chang, M.D.) (Bates Stamped 0043 through 0044)	\$134.00
24 25	Legal Wings (Invoice No.: P-1911092.01 - Process Serve of Trial Subpoena on Naomi Chaney, MD.) (Bates Stamped 0045 through 0046)	\$129.00
26 27	Gresia Tarango (Court Parking) (Bates Stamped 0047)	\$18.00
28	Legal Wings (Invoice No. R-1912062.01 - Rush Court Run to Deliver Documents to Kimball) (Bates Stamped 0048 through 0049)	\$59.04

Legal Wings (Invoice No.: P-1911096.01 - Process Serve of Trial Subpoena on Lowell Pender) (Bates Stamped 0050 through 0051)	\$134.00
National Medical Consultants, P.C. (Invoice No.: 28513 - Trial Appearance for Expert Alan Stein, MD) (Bates Stamped 0052 through 0053)	\$9,000.00
National Medical Consultants, P.C. (Invoice No.: 28712 - Trial Appearance for Expert Justin Willer, MD.) (Bates Stamped 0054 through 0055)	\$10,000.00
Legal Wings (Invoice P-1911094.01 - Process Serve of Trial Subpoena on Sky Prince, M.D.) (Bates Stamped 0056 through 0057)	\$129.00
National Medical Consultants, P.C. (Invoice No.: 28711 - Trial Appearance for Expert Michael Hurwitz, MD) (Bates Stamped 0058 through 0059)	\$8,000.00
Legal Wings (Invoice No.: P-1911095.01 - Process Serve of Trial Subpoena on Addison Durham) (Bates Stamped 0060 through 0061)	\$129.00
Legal Wings (Invoice No.: R-1911871.01 - Plaintiffs' Renewed Motion to Strike on OST) (Bates Stamped 0062 through 0063)	\$52.95
Alex Barchuk, M.D. (Invoice No.: 2443 - Deposition Prep) (Bates Stamped 0064 through 0065)	\$4,825.00
Eighth Judicial District Court Portal (Copies of Complaint and Answer from Vickie Center v Barry Rives) (Bates Stamped 0066)	\$30.50
Alex Barchuk, M.D. (Invoice No.: 2495. Trial Testimony Retainer) (Bates Stamped 0067 through 0068)	\$6,000.00
Domino's Pizza (Pizza for Jury) (Bates Stamped 0069 through 0072)	\$85.80
Greg Cochran (Invoice No.: 2019-00101 - Notary Service for Dr. Hurwitz for Audiovisual Consent) (Bates Stamped 0073)	\$50.00
Legal Wings (Invoice No.: P-1911091.01 - Process Serve of Trial Subpoena on Barry Rives, MD) (Bates Stamped 0074 through 0075)	\$129.00
Legal Wings (Invoice No.: P-1911090.01 - Process Serve of Trial Subpoena on Vickie Center) (Bates Stamped 0076 through 0077)	\$129.00
Alex Barchuk, M.D. (Invoice No.: 2511 - Trial Testimony (Total Invoice is for \$12,670.00, minus \$6,000.00 Trial Testimony Retainer)	\$6,670.00

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Legal Wings (Invoice No. R-1912104.01 - Rush Court Run to Deliver Documents to Kimball) (Bates Stamped 0080 through 0081)	\$61.56
Uber Ride (Bates Stamped 0082 through 0084)	\$23.78
Uber Ride (Bates Stamped 0085 through 0087)	\$14.62
Uber Ride (Bates Stamped 0088 through 0090)	\$8.08
Uber Ride (Bates Stamped 0091 through 0093)	\$8.08
DALOS Legal Services (Invoice No.: 251033 - Video Editing and Powerpoint) (Bates Stamped 0094 through 0095)	\$3,336.25
E-Filing Charges (Bates Stamped 0096 through 0171)	\$70.00
TOTAL	\$74,138.70

# HAND & SULLIVAN, LLC MEMORANDUM OF COSTS AND DISBURSEMENTS

Legal Wings Invoices	\$159.50
Page(s) 00141-00144	
Filing Fee for Judgment on Verdict	\$3.50
Page(s) 00145-00146	
Court Parking Cost	\$42.00
Page(s) 00147-00154	
Dawn Cook Consulting Expert Invoices	\$2,795.78
Page(s) 00155-00158	
Deposition videography cost for Bart Carter, M.D. deposition	\$1,096.44
Page(s) 00159	
Deposition transcript for Bart Carter, M.D. deposition	\$1,146.88
Page(s) 00160-00161	
Recorder's fee for Jury Trial	\$1,588.00
Page(s) 00162-00163	
Travel Expense-Food Delivery for Dr. Justin Willer's Trial	\$23.40
Appearance	
Page(s) 00164-00165	
Court Parking Cost	\$339.00
Page(s) 00166-00186	
Travel Expense-Southwest Airlines for Dr. Mike Hurwitz's	\$91.00
Deposition	
Page(s) 00187-00188	
Travel Expense-JetBlue Airlines for Dr. Mike Hurwitz's Deposition	\$328.98
Page(s) 00189-00190	

1	Deposition transcript for Dawn Cook, RN Deposition Page(s) 00191	\$493.80
2	Deposition transcript for Addison Durham; Sky Prince; and Lowell	\$591.00
3	Pender Depositions Page(s) 00192	
4	Deposition transcript for Dr. Terrence Clauretie Deposition Page(s) 00193	\$479.20
5	Travel Expense-Hotel Reservation for Dr. Alan Stein's Trial	\$181.93
6	Appearance Page(s) 00194-00195	
7	Travel Expense-Hotel Reservation for Dr. Justin Willer's Trial	\$168.37
8	Appearance	·
9	Page(s) 00196-00197 Travel Expense-JetBlue Airlines for Dr. Alan Stein's Trial	\$596.60
10	Appearance	40,000
11	Page(s) 00198-00199  Deposition Videography for Dr. Brian Juell's Deposition	\$933.79
12	Page(s) 00200-00202	\$733.17
	Travel Expense-JetBlue Airlines for Dr. Justin Willer's Trial	\$444.30
13	Apperance Page(s) 00203-00204	
14	Travel Expense-American Airlines for Dr. Justin Willer's Trial	\$466.00
15	Apperance Page(s) 00205-00207	
16	Deposition transcript for Dr. Alex Barchuk Deposition Page(s) 00208	\$626.85
17	Court Parking Cost	\$21.00
18	Page(s) 00209-00210 Deposition transcript for Dr. Brian Juell's Deposition	\$622.16
19	Page(s) 00211-00212	
20	Court Parking Cost	\$6.00
21	Page(s) 00213-00216  Filing Fee for Receipt of Copy-Plaintiff's Motion for Sanctions	\$3.50
	Under Rule 37 for Defendants' Intentional Concealment of Defendant Rives' History of Negligence and Litigation and Motion	
22	for Leave to Amend Complaint to Add Claim for Punitive Damages	
23	on Order Shortening Time	
24	Page(s) 00217-00219  Deposition transcript for Dr. Justin Willer's Deposition	\$425.10
25	Page(s) 00220	
26	Deposition transcript for Dr. Alan Stein's Deposition Page(s) 00221	\$983.25
	Filing Fee for Notice of 2.67 Conference	\$3.50
27	Page(s) 00222-00224	¢15.00
28	Court Parking Cost Page(s) 00225-00226	\$15.00

1	Travel Expense-Enterprise Car Rental for attorney Hand to Dr.	\$86.10
	Alex Barchuk's Deposition	
2	Page(s) 00227-00228	
3	Travel Expense-McCarran International Airport Parking Cost Page(s) 00229-00230	\$36.00
4	Travel Expense-Southwest Airlines flight for attorney Hand to Dr.	\$637.96
_	Alex Barchuk's Deposition	
5	Page(s) 00231-00233	
6	Travel Expense-Hotel Reservation for attorney Hand for Dr. Alan	\$744.36
	Stein and Dr. Justin Willer's Depositions	
7	Page(s) 00234	
8	Expert Fee for Supplement to Economic Analysis of Life Care Plan  Page(s) 00235-00236	\$350.00
9	Deposition transcript for Dr. Naomi Chaney's Deposition	\$417.35
	(including exhibits)	
10	Page(s) 00237	
	Courier Fee-FedEx delivery of DVD mailed to Dr. Justin Willer-	\$36.65
11	Deposition Prep Review	
12	Page(s) 00238	0.504.06
	Travel Expense-JetBlue Airlines for attorney Hand for Dr. Justin	\$591.36
13	Willer and Dr. Alan Stein's Depositions	
14	Page(s) 00239-00245  Defense Expert Fee-Erik Volk's Deposition Testimony	\$630.00
	Page(s) 00246-00247	\$030.00
15	Courier Fee-FedEx delivery of Reports & Films to Dr. Alan Stein	\$44.80
16	and Dr. Mike Hurwitz	<b>\$11.00</b>
10	Page(s) 00248	
17	Travel Expense-McCarran International Airport Parking Cost	\$33.00
18	Page(s) 00249-00250	
10	Defense Expert Fee-Dr. Bart Carter's Expert Fee for Deposition	\$2,000.00
19	Testimony	
20	Page(s) 00251	** ***
20	Defense Expert Fee-Dr. Brian Juell's Expert Fee for Deposition	\$2,500.00
21	Testimony Page(s) 00252	
	Travel Expense-Hotel Reservation for attorney Hand for Dr. Bart	\$114.04
22	Carter's Deposition	\$114.04
23	Page(s) 00253-00254	
	Travel Expense-Hotel Reservation for attorney Hand for Dr. Brian	\$198.63
24	Juell's Deposition	Ψ170.02
25	Page(s) 00255	
23	Travel Expense-Enterprise Car Rental for attorney Hand for Dr.	\$82.96
26	Brian Juell's Deposition	
27	Page(s) 00256-00257	
27	Travel Expense-Budget Car Rental for attorney Hand for Dr. Bart	\$109.23
28	Carter's Deposition	
	Page(s) 00258-00259	

1	Travel Expense-Southwest Airlines for attorney Hand for Dr. Brian	\$253.98
2	Juell's Deposition	
4	Page(s) 00260-00263	44.00.00
3	Travel Expense-Southwest Airlines for attorney Hand for Dr. Bart	\$268.68
4	Carter and Dr. Brian Juell's Depositions Page(s) 00264-00266	
7	Travel Expense-Southwest Airlines for attorney Hand for Dr. Bart	\$380.18
5	Carter and Dr. Brian Juell's Depositions	,
6	Page(s) 00267-00270	
		Φ15. <b>5</b> 5
7	Courier Fee-FedEx delivery of documents to Dr. Terrence	\$15.75
8	Clauretie-Deposition Preparation Page(s) 00271	
	Copy Fee for Medical Records from Steinberg Diagnostics	\$34.80
9	Page(s) 00272	·
10	Dr. Alan Stein's Expert fee for review of Expert Witness Reports	\$1,000.00
11	and Preparation of Rebuttal Report	
11	Page(s) 00273-00274  Dawn Cook's Expert Fee for Medical Bill Review	\$3,211.25
12	Page(s) 00275-00276	\$3,211.23
13	Deposition transcript of Titina and Patrick Farris	\$612.98
	Page(s) 00277-00278	*
14	Dr. Michael Hurwit'z Expert Fee for Case Review/Consultation and	\$1,500.00
15	Declaration Preparation Report	
	Page(s) 00279-00280  Videography Fee for Day in the Life of Titina Farris and Interviews	\$1,200.00
16	of Family Members	\$1,200.00
17	Page(s) 00281-00282	
18	Courier Fee-Legal Wings fee for delivery of Stipulation and Order	\$10.00
10	to Extend Discovery Deadlines (Fifth Request) to Mandeblaum's	
19	Office Regg(c) 00293	
20	Page(s) 00283  Deposition transcript and CD of Exhibits for Dr. Barry Rives	\$1,436.50
	Deposition  Deposition	\$1,730.30
21	Page(s) 00284-00285	
22	Dr. Justin Willer and Dr. Alan Stein's Expert fee for Review of	\$5,175.00
	Records and Preparation of Report	
23	Page(s) 00286-00288  Copy fee for Care Meridian Medical Records	\$179.00
24	Page(s) 00289	\$179.00
25	Copy fee for Southern Nevada Pain Center Medical Records	\$12.00
25	Page(s) 00290-00291	
26	Dawn Cook Expert Fee for Bill Review Retainer	\$1,000.00
27	Page(s) 00292	<b>41.200.00</b>
	Dr. Justin Willer's Expert fee for Review of Records	\$1,200.00
28	Page(s) 00293	

1	Courier Fee-FedEx delivery of Records to National Medical	\$155.35
2	Consultants	
4	Page(s) 00294	<b>***</b>
3	Dr. Terrence Clauretie Review for Analysis and Report for Life Care Plan	\$1,575.00
4	Page(s) 00295-00296	
	Dr. Daniel Feingold Consultant Record Review	\$2,000.00
5	Page(s) 00297	
6	Filing Fee for Notice of Taking the Deposition of Barry Rives, M.D.	\$3.50
7	Page(s) 00298-00300	
8	Courier Fee-Legal Wings delivery of Stipulation and Order to	\$10.00
	Extend Discovery (Fourth Request) to Mandelbaum's Office Page(s) 00301-00302	
9	Dr. Alex Barchuk's Expert Fee for Patient Evaluation, Report and	\$8,625.00
10	Record Review	Ψο,ο=ε.οο
	Page(s) 00303-00304	
11	Courier Fee-Legal Wings pick up of CD Disc films from St. Rose	\$32.00
12	Dominican Hospital-San Martin Campus Radiology Department	
12	Page(s) 00305 Copy fee for Medical Records from Advanced Orthopedics &	\$61.20
13	Sports Medicine	\$01.20
14	Page(s) 00306-00307	
15	Dawn Cook review for Life Care Plan	\$8,950.00
13	Page(s) 00308-00309	
16	Copy fee for films from St. Rose Dominican	\$32.00
17	Page(s) 00310 Copy fee for Medical Records from Ciox	\$8.98
	Page(s) 00311	\$0.70
18		
19	Courier Fee-Segura Legal Services for Delivery of Stipulation and	\$12.00
	Order	
20	Page(s) 00312	Φζ 000 00
21	Dr. Alex Barchuk's Life Care Plan Evaluation Page(s) 00313	\$6,000.00
22	Dawn Cook Review for Life Care Plan	\$5,000.00
22	Page(s) 00314	φε,σσσ.σσ
23	Travel Expense-Hotel Reservation for Titina and Patrick Farris for	\$225.23
24	Mrs. Farris Medical Examination with Dr. Alex Barchuk	
	Page(s) 00315	¢402.02
25	Travel Expense-Southwest Airlines for Titina and Patrick Farris for Mrs. Farris' Medical Examination with Dr. Alex Barchuk	\$403.92
26	Page(s) 00316-00318	
	Filing Fee for Stipulation and Order to Extend Discovery	\$3.50
27	(SECOND REQUEST)	
28	Page(s) 00319-00320	

1	Copy fee for Medical and Billing Records from Desert Valley	
	Theraphy	
2	Page(s) 00321	
3	Filing fee for Stipulation and Order to Extend Discovery (First	
	Request)	
4	Page(s) 00322-00323 Copy fee for Medical Records from CIOX Health	
5	Page(s) 00324-00325	
	Courier Fee-AMPM Legal Solutions pick up of JCCR from Aimee	
6	Lambert's office	
7	Page(s) 00326-00327	
	Courier Fee-AMPM Legal Solutions for Service of Process on	
8	Defendants	
9	Page(s) 00328-00330	
	Filing fee for Complaint	
10	Page(s) 00331 National Medical Consultants Review	
11	Page(s) 00332	
	National Medical Infectious Disease Review	
12	Tumonum Moundum Biseuse Tevrew	
13	Medical Records Southern Nevada Surgery Specialists	
14	Filing fee for JCCR	
15		
13	Filing fee for Affidavit of Service	
16	E (D : 1 D D ::	
17	Expert Review by Dr. Pesiri	
	TOTAL	
18	101112	
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	Page 10 of 13	
	1 450 10 01 13	

\$46.20

\$3.50

\$36.29

\$12.00

\$70.00

\$303.50

\$900.00

\$1,200.00

\$25.00

\$3.50

\$3.50

\$2,500.00

\$78,979.56

# <u>DECLARATION OF KIMBALL JONES, ESQ., IN SUPPORT OF THE MEMORANDUM</u> <u>OF COSTS AND DISBURSEMENTS</u>

KIMBALL JONES, ESQ., being duly sworn, states: that affiant is the attorney for Plaintiffs TITINA FARRIS and PATRICK FARRIS, and has personal knowledge of the above costs and disbursements expended; that the items contained in the above memorandum are true and correct to the best of this affiant's knowledge and belief; and that the said disbursements have been necessarily incurred in this action.

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

Dated this 21st day of January, 2020.

/s/ Kimball Jones
KIMBALL JONES, ESQ.

# <u>DECLARATION OF GEORGE F. HAND, ESQ., IN SUPPORT OF THE MEMORANDUM</u> <u>OF COSTS AND DISBURSEMENTS</u>

GEORGE F. HAND, ESQ., being duly sworn, states: that affiant is the attorney for Plaintiffs TITINA FARRIS and PATRICK FARRIS, and has personal knowledge of the above costs and disbursements expended; that the items contained in the above memorandum are true and correct to the best of this affiant's knowledge and belief; and that the said disbursements have been necessarily incurred in this action.

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

Dated this 21st day of January, 2020.

/s/ George F. Hand GEORGE F. HAND, ESQ.

# 1 **CERTIFICATE OF SERVICE** 2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of 3 BIGHORN LAW, and on the 21st day of January, 2020, I served the foregoing PLAINTIFFS' 4 SUPPLEMENTAL VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS as 5 follows: 6 7 Electronic Service – By serving a copy thereof through the Court's electronic service system; and/or 8 U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage 9 prepaid and addressed as listed below: 10 Kim Mandelbaum, Esq. 11 MANDELBAUM ELLERTON & ASSOCIATES 2012 Hamilton Lane Las Vegas, Nevada 89106 13 Thomas J. Doyle, Esq. 14 Chad C. Couchot, Esq. SCHUERING ZIMMERMAN & DOYLE, LLP 15 400 University Avenue Sacramento, California 95825 16 Attorneys for Defendants 17 18 /s/ Erickson Finch An employee of **BIGHORN LAW** 19 20 21 22 23 24 25 26 27 28 Page 13 of 13

# BIGHORN LAW MEMORANDUM OF COSTS AND DISBURSEMENTS

## TRANSCRIBER'S BILLING INFORMATION

CASE #	A-16-731390-C		
CASE NAME:	Vickie Center v Barry Rives		
JURY TRIAL DATES:	4/1/2019, 4/2/2019, 4/3/2019 and 4/4/2019		
DEPARTMENT #	2		
COURT	Dalyne Easley		
RECORDER/	Court Recorder		
EXTENSION	x0663		
ORDERED BY:	Kimball Jones, Esq.		
FIRM:	Bighorn Law		
EMAIL:	Erick@bighornlaw.com		
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check  Mailing Address: Regional Justice Center Fiscal Services Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155  Call 671-4507 to charge (VISA/MASTERCARD)		
<b>BILL AMOUNT:</b>	4 CDs/DVDs @ \$2 or Thumb driver \$5 = \$8.00		
	hours @ \$40 an hour recording fee = \$		
	pages @ \$5.01   per page of trans.   \$		
	Total Due: \$8.00		
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to:		
BILL AMOUNT:	pages @ \$ per page of trans \$		
	TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL		
	PAYMENT IS RECEIVED		

40		Titina Farris (Erick) A-16-731390-C
DOLLARS		Clark County Treasurer
		nd 00/100*********************************
\$ **8.00		PAY TO THE Clark County Treasurer
09/16/2019	16-1606/1220	Las Vegas, NV 89107 702-333-1111
1588	CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103	Bighorn Law LLC 716 South Jones Blvd

# BRUCE T. ADORNATO, M.D. Neurology

177 Bovet Road Suite 600 San Mater, Caldornia 94402 650,638,2308

### Invoice:

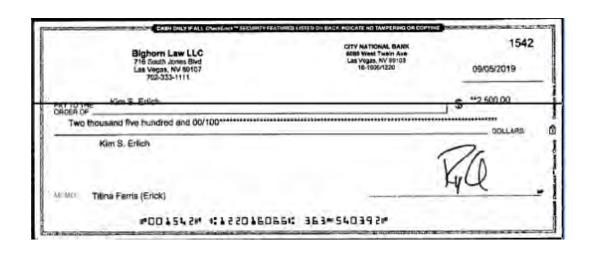
Farris v Rives, MD Deposition of Bruce Adornato MD July 23, 2019

10 am-1230pm 2.5hrs @700/h = \$1750.

Bruce T. Adornato MD 177 Bovet Rd, Suite 600 San Mateo, CA 94402

TAX ID 77-0122930





# National Medical Consultants, P.C. 14-14 Bonnie Lane

14-14 Bonnie Lane Bayside, NY 11360

# Invoice

Date	Invoice #
7/3/2019	27849

Bill To

George F. Hand, Jr., Esq. Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, Nevada 89129

	Due upon rece	ipt	FAX#
	7/3/2019		
Description	Quantity	Rate	Amount
Pre-deposition preparation of Dr. Alan Stein 7/16/19 Re: Your client TITINA FARRIS Review of depositions 4.42 hours Pre-deposition preparation 5.00 hours	9.42	500.00	4,710.00

Make check payable to: National Medical Consultants, P.C.

Tax I.D. # 14-1843204

Total

Phone #	Fax#	E-mail
718-423-9167	718-423-9169	medicalconsultants@nyc.rr.com

\$4,710.00





George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

# INVOICE

Invoice No.	Invoice Date	Job No.		
289944	8/14/2019	247245		
Job Date Case No.				
7/23/2019	A-16-739464-C			
Case Name				
Farris, et alv- Rives, M.D., et al.				
Payment Terms				
Due upon receipt				

MOBILE VIDEOCONFERENCE WITH VIDEO TECH

Bruce Adornato, M.D. - VIDEO

Mobile Videoconference Setup fee

Video Technician

Video Upload/Archive

3.50 Hours

175.00 805.00

25.00

TOTAL DUE >>>

\$1,005.00

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

Account Number: 1048289 Wire Routing Number: 055003528 We accept all major credit cards, subject to a 3% convenience fee.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within

30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

Invoice No. : 289944 Invoice Date : 8/14/2019

: \$1,005.00 **Total Due** 

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

Job No. : 247245 BU ID : 42-NoCal-V

Case No.

: A-16-739464-C Case Name : Farris, et al. -v- Rives, M.D., et al.

THE STATE OF THE PARTY OF THE P		Titina Farris (Erick) - Invoice No.: 289944
)		Planet Depos, LLC
€9		***************************************
***1 005 00		Planet Denne IIIC
09/25/2019	16-1608/1220	Las Vegas, NV 89107 702-333-1111
1633	CITY NATIONAL BANK	Bighorn Law LLC



George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

# INVOICE

Invoice No.	Invoice Date	Job No.		
289932	8/14/2019	254593		
Job Date Case No.				
7/23/2019	A-16-739464-C			
Case Name				
Farris, et alv- Rives, M.D., et al.				
Payment Terms				
Due upon receipt				

	TOTAL DUE >>>	\$828.80
Shipping & Handling		40.00
Processing Fee		36.00
Exhibits	33.00 Pages	13.20
Attendance		90.00
Hard Copy Transcript	116.00 Pages	11.60
Kim Steven Erlich, M.D.	116.00 Pages	638.00
TRANSCRIPT WITH INDEX OF:		

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

Wire Routing Number: 055003528 Account Number: 1048289 We accept all major credit cards, subject to a 3% convenience fee.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within 30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

George Hand, Esquire Invoice No. Hand & Sullivan, LLC Invoice Date 3442 North Buffalo Drive **Total Due** Las Vegas, NV 89129

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

: 254593 Job No. BU ID : 41-NoCal-R : A-16-739464-C Case No.

Case Name : Farris, et al. -v- Rives, M.D., et al.

: 289932

: 8/14/2019

: \$828.80

NO		Titina Farris (Erick) - Invoice No.: 289932
		Planet Depos, LLC
DOLLARS		Eight hundred twenty-eight and 80/100**********************************
\$ **828.80		PAY TO THE Planet Depos, LLC
09/25/2019	16-1606/1220	Las Vegas, NV 89107 702-333-1111
1631	GITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103	Bighorn Law LLC 716 South Jones Bivd



George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

# INVOICE

Invoice No.	Invoice Date	Job No.
289943	8/14/2019	254595
Job Date	Case	No.
7/23/2019	A-16-739464-C	
	Case Name	
Farris, et alv- Rives, N	1.D., et al.	
	Payment Terms	
Due upon receipt		

MOBILE VIDEOCONFERENCE WITH VIDEO TECH

Kim Steven Erlich, M.D. - VIDEO

Video Technician
Video Upload/Archive

3.50 Hours

805.00 25.00

TOTAL DUE >>>

\$830.00

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

Account Number: 1048289 Wire Routing Number: 055003528

We accept all major credit cards, subject to a 3% convenience fee.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within 30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129 Invoice No. : 289943
Invoice Date : 8/14/2019

Total Due : \$830.00

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

Job No. : 254595 BU ID : 42-NoCal-V Case No. : A-16-739464-C

Case Name : Farris, et al. -v- Rives, M.D., et al.

M		Titina Farris (Erick) - Invoice No.: 289943
DOLLARS		Planet Depos, LLC
*******************	***************************************	Eight hundred thirty and 00/100*********************************
\$ **830.00		PAY TO THE Planet Depos, LLC
09/25/2019	Las Vegas, NV 89103 16-1606/1220	716 South Jones Blvd Las Vegas, NV 89107 702-333-1111
1632	GITY NATIONAL BANK 6085 West Twain Ave	Bighorn Law LLC

# National Medical Consultants, P.C.

14-14 Bonnie Lane Bayside, NY 11360

# Invoice

Date	Invoice #
9/12/2019	28475

Bill To	
George F. Hand, Jr., Esq.	
Hand & Sullivan, LLC	
3442 North Buffalo Drive	
Las Vegas, Nevada 89129	

		Due upon rec	eipt	FAX#
		9/12/2019		
	Description	Quantity	Rate	Amount
Pre-deposition prepa Your client Titina Fa	ration of Dr. Michael Hurwitz urris	3	500.00	1,500.00
Make check payable t Tax I.D. # 14-184320	to: National Medical Consultan 14	ats, P.C.	tal	\$1,500.00
Make check payable to Tax I.D. # 14-184320	to: National Medical Consultan 14 Fax#	nts, P.C.  To		\$1,500.00

	Bighorn Law LLC 716 South Jones Blvd Las Vegas, NV 89107 702-333-1111	CITY NATIONAL BANK 6085 Wirst Twain Ave Las Vegas, NV 69103 16-1606/1220		1629 09/25/2019
PAY TO THE ORDER OF One tho	National Medical Consultants, PC usand five hundred and 00/100*********************************		\$	**1,500.00
	National Medical Consultants, PC 14-14 Bonnie Lane Bayside, NY 11360	,	V./	DOLLARS
to Pi	tina Farris (Erick) - Invoice No.: 28475		HIC	<u> </u>
	1220210511 **P52100*	163m5L0392m		



George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

### INVOICE

Invoice No.	Invoice Date Job No.			
289927	8/14/2019 247243			
Job Date	Job Date Case No.			
7/23/2019	A-16-739464-C			
	Case Name			
Farris, et alv- Rives, M.D., et al.				
Payment Terms				
Due upon receipt				

	TOTAL DUE >>>	\$1,390.99
Processing Fee		36.00
Exhibits	46.00 Pages	18.40
Conference Room(s)		563.39
Attendance		90.00
Hard Copy Transcript	122.00 Pages	12.20
Bruce Adornato, M.D.	122.00 Pages	671.00
TRANSCRIPT WITH INDEX OF:		

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within 30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129 Invoice No. : 289927

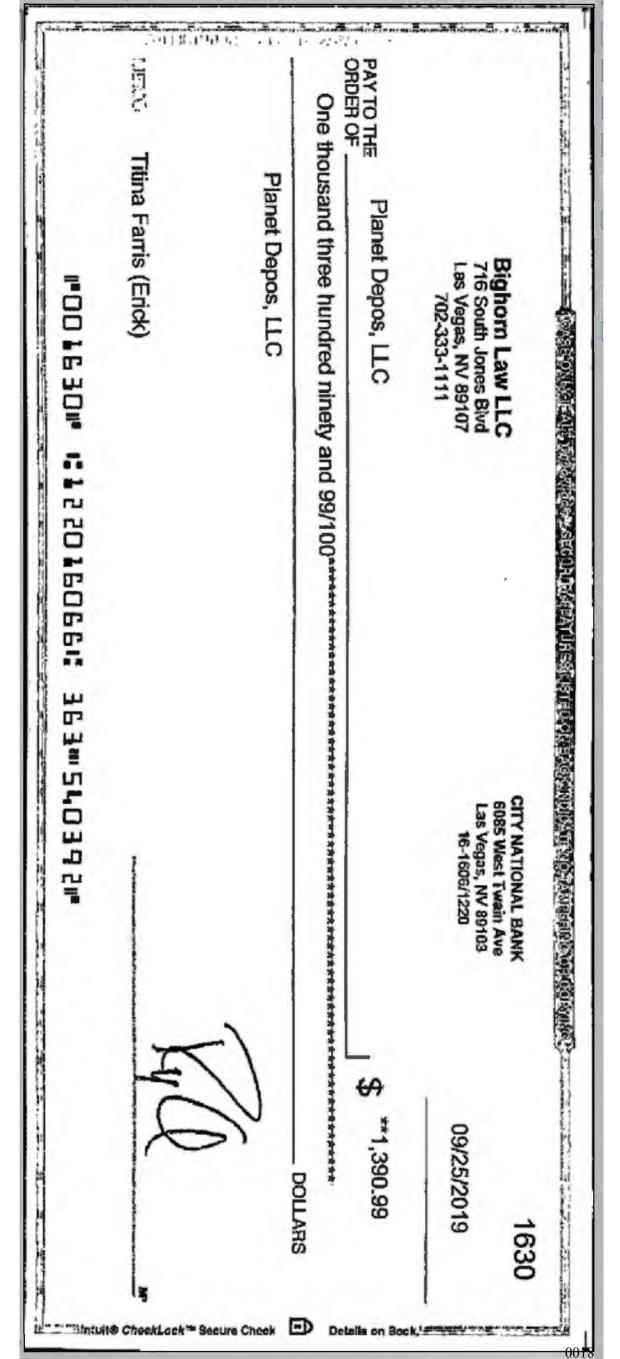
Invoice Date : 8/14/2019 **Total Due : \$1,390.99** 

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

Job No. : 247243
BU ID : 41-NoCal-R
Case No. : A-16-739464-C

Case Name : Farris, et al. -v- Rives, M.D., et al.



# National Medical Consultants, P.C.

14-14 Bonnie Lane Bayside, NY 11360

## Invoice

Date	Invoice #		
5/21/2019	27498		

Bill To

George F. Hand, Jr., Esq.
Hand & Sullivan, LLC

3442 North Buffalo Drive Las Vegas, Nevada 89129

Due upon receipt	FAX
------------------	-----

	3/21/2017		
Description	Quantity	Rate	Amount
Pre-deposition preparation 2.00 hours Review of additional records 3.75 hours of Dr. Justin Willer Your client TITINA FARRIS	5.75	500.00	2,875.00
Travel to & from	1	375.00	375.00
			- 1

Make check payable to: National Medical Consultants, P.C.

Tax I.D. # 14-1843204

Total

\$3,250.00

Phone #	Fax #	E-mail
718-423-9167	718-423-9169	medicalconsultants@nyc.rr.com





George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

### INVOICE

Invoice No.	No. Invoice Date Job No.				
290970	8/20/2019 247484				
Job Date	Job Date Case No.				
7/29/2019	A-16-739464-C				
	Case Name				
Farris, et alv- Rives, M.D., et al.					
Payment Terms					
Due upon receipt					

MOBILE VIDEOCONFERENCE WITH VIDEO TECH

Lance Stone, D.O. - VIDEO

Mobile Videoconference Setup fee

Video Technician

Video Upload/Archive

2.50 Hours

575.00

1.50 110015

25.00

175.00

TOTAL DUE >>>

\$775.00

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

Account Number: 1048289 Wire Routing Number: 055003528 We accept all major credit cards, subject to a 3% convenience fee.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within 30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129 Invoice No. : 290970
Invoice Date : 8/20/2019

Total Due : \$775.00

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

BU ID : 42-NoCal-V Case No. : A-16-739464-C

Job No.

Case Name : Farris, et al. -v- Rives, M.D., et al.

: 247484

Bighorn Law LLC 716 South Jones Bivd Las Vegas, NV 89107 702-333-1111  TO THE Planet Depos, LLC Seven hundred seventy-five and 00/100*********************************	¥∃!!: Titina Fa	Planet	PAY TO THE Plan	
CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220	rris (Erick) - Invoice No.: 290970			Bighorn Law LLC 716 South Jones Blvd Las Vegas, NV 89107 702-333-1111
			•	CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220



George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

### INVOICE

Invoice No.	Invoice Date	Job No.		
290767 8/20/2019 247483				
Job Date	Job Date Case No.			
7/29/2019 A-16-739464-C				
Case Name				
Farris, et alv- Rives, M.D., et al.				
Payment Terms				
Due upon receipt				

	TOTAL DUE >>>	\$671.32
Shipping & Handling		40.00
Processing Fee		36.00
Tabbing & Binding Exhibits		25.00
Exhibits	30.00 Pages	12.00
Conference Room(s)		74.52
Attendance		75.00
Hard Copy Transcript	73.00 Pages	7.30
Lance Stone, D.O.	73.00 Pages	401.50
TRANSCRIPT WITH INDEX OF:		

Due upon receipt and is not contingent on client payment.

For your convenience we now accept payments via wire transfer.

Account Number: 1048289 Wire Routing Number: 055003528 We accept all major credit cards, subject to a 3% convenience fee.

For billing questions, please email billing@planetdepos.com or call 888.433.3767. Invoice disputes must be brought to our attention within 30 days of receipt. Thank you for your business.

Tax ID: 26-3280557

Please detach bottom portion and return with payment.

Invoice No.

Total Due

George Hand, Esquire Hand & Sullivan, LLC 3442 North Buffalo Drive Las Vegas, NV 89129

Job No. : 247483
BU ID : 41-NoCal-R
Case No. : A-16-739464-C

Invoice Date : 8/20/2019

Case Name : Farris, et al. -v- Rives, M.D., et al.

: 290767

: \$671.32

Remit To: Planet Depos, LLC P.O. BOX 69136

Baltimore, MD 21264-9136

\$ **671.32 09/25/201	**990910221* ** 159100*
\$ **671.32	Titina Farris (Erick) - Invoice No.: 290767
\$ **671.32	Planet Depos, LLC
LLC 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220  \$ 10-1606/1220  \$ **671.32	dred seventy-one and 32/100***********************************
6085 West Twain Ave Las Vegas, NV 99103 16-1606/1220 09/25/201	PAY TO THE Planet Depos, LLC
1634	Bighorn Law LLC 716 South Jones Blvd Las Vegas, NV 89107 702-333-1111





Invoice #: R-1908919.01

Route #: 207

Due By:

Invoice Date: 9/21/2019 Invoice #: R-1908919.01

Attn: ERICK FINCH BIGHORN LAW 9345 W SUNSET RD STE 100 LAS VEGAS, NV 89148

TOTAL INVOICE AMOUNT DUE \$10.00

Date Completed 9/18/2019

Job #: R-1908919.01 Attorney #: FARRIS, TITINA

Workorder #: 02031840 Plaintiff: FARRIS

Defendant: RIVES

Case Number A-16-739464-C

Documents: MOTION FOR SANCTIONS AND FOR LEAVE TO AMEND

COMPLAINT ON OST

**TOTAL INVOICE CHARGES:** 

TOTAL INVOICE PAYMENTS:

TOTAL INVOICE AMOUNT DUE:

\$10.00

\$10.00

Legal Wings, Inc., 1118 Fremont St., Las Vegas, NV 89101 Telephone: 702-384-0015, FAX: 702-384-8638, Tax ID: 88-0223382

## INVOICE

3770 Howard Hughes Prkwy. Suite 300 Los Vegas, NA 89169 Phone: 800.330 1112 SERVICES Litigation Services.com Discovery Depositions : friel OCT 03 2019 Kimball Jones, Esq.

Invoice No.	Invoice Date	Job No.
1337228	10/1/2019	573931
Job Date	Case	No,
9/18/2019	A-16-739464-C	
	Case Name	
Parris vs. Rives, M.		
	Payment Terms	
Due upon receipt		

E Transcript Copy of the Medical Deposition of:		
Michael B. Hurwitz, M.D., FACS		758.05
	TOTAL DUE >>>	\$758.05
	AFTER 10/1/2019 PAY	\$833.86
Location of Deposition: Newport Beach, CA		
Please note, disputes or refunds will not be honored or issued after 30 days		
		Ĭ

Tax ID: 37-1787700

Bighorn Law

716 S. Jones Boulevard Ste. 100

Las Vegas, NV 89107

Phone: 702-333-1111 Fax:

Please detach bottom portion and return with payment.

Kimball Jones, Esq. Bighorn Law 716 S. Jones Boulevard Ste, 100 Las Vegas, NV 89107

Remit To: Litigation Services & Technologies of

California, LLC P.O. Box 98813

Las Vegas, NV 89193-8813

Job No. : 573931 BU ID

: NC-CRQ

Case No.

: A-16-739464-C

Case Name : Farris vs. Rives, M.D., et al.

Invoice No. : 1337228

Invoice Date : 10/1/2019

Total Due : \$ 758.05 AFTER 10/1/2019 PAY \$833.86

PAYMENT WI	TH CREDIT CARD
Cardholder's Na	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address:	<del></del>
Zip:	Card Security Code:
Amount to Chai	rge:
Cardholder's Sig	gnature:
Email:	

CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220  California, LLC	Litigation Services and Technologies of California, LL PO Box 98813 Las Vegas, NV 89193-8813  MEMO Titina Farris (Erick)	PAY TO THE Litigation Services and Technologies of Californ DER OF Seven hundred fifty-eight and 05/100**********************************	Bighorn Law LLC 716 South Jones Blvd Las Vegas, NV 89107 702-333-1111
	nologies of California, LL	California, LLC \$ "758.0	CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220





Invoice #: R-1910077.01

Route #: 207

Due By:

Invoice Date: 10/2/2019 Invoice #: R-1910077.01

Attn: ERICK FINCH
BIGHORN LAW
9345 W SUNSET RD STE 100
LAS VEGAS, NV 89148

TOTAL INVOICE AMOUNT DUE

\$95.00

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Job#: R-1910077.01 Attorney#: FARRIS, TITINA Workorder#: 02031852

Plaintiff: FARRIS
Defendant: RIVES
Case Number A-16-739464-C

-----

Documents: PLAINTIFFS' MOTION TO STRIKE ON OST

Date Completed 9/30/2019

Description	Qty	Fee	Total Fee
EXPEDITE AREA A PICK UP FROM DISTRICT COURT	1	\$35.00	\$35.00
E-FILE - RUSH	1	\$25.00	\$25.00
SPECIAL AREA A DELIVER TO MANDELBAUM AT 2012 HAMILTON LANE BY 2PM	1	\$25.00	\$25,00
PRINTING/COPY FEE - MAKE A COPY OF O.S.T. FOR DELIVERY	1	\$10.00	\$10.00
	Job Total Due =		\$95.00
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			

**TOTAL INVOICE CHARGES:** 

\$95.00

TOTAL INVOICE PAYMENTS:

TOTAL INVOICE AMOUNT DUE:

\$95.00

Legal Wings, Inc., 1118 Fremont St., Las Vegas, NV 89101 Telephone: 702-384-0015, FAX: 702-384-8638, Tax ID: 88-0223382

**Bighorn Law LLC** Las Vegas, NV 89107 716 South Jones Blvd

702-333-1111

Legal Wings, Inc

CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220

\$ --95.00

Titina Farris (Erick) Invoice No.: R-1910077.01

Las Vegas, NV 89101

Legal Wings, Inc 1118 Fremont Street

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**DALOS Legal Services** 2831 St. Rose Pkwy. 200-234 Henderson, NV 89052



#### **INVOICE**

**BIGHORN LAW** ATTN: Kimball J. Jones, Esq. 2001 S. Maryland Parkway

**Invoice Number:** 250974

Invoice Date: 10/24/2019

Las Vegas, NV 89104

In Re: FARRIS v. RIVES, ET AL.

Witness(s): Trial Binders

Attendance Date: 10/07/2019, 8:00 a.m.

Location: BIGHORN LAW - 2001 S. Maryland Parkway - Las Vegas, NV 89104

Qty	Description	Rate	Ext
3	4 Inch Trial Exhibit Binder	11.99	35.97
1	5 Inch Trial Exhibit Binder	19.99	19.99
996	Color blowback	0.55	547.80
2592	B&W blowback	0.05	129.60
140	Numbered tab	0.25	35.00
3	1 Inch Demonstrative Binder	3.99	11.97
591	B&W blowback	0.05	29.55

Invoice Total: 809.88

We Appreciate Your Business!

Tax ID: 61-1728938

Please detach bottom portion and return with payment

Invoice Number: 250974 10/24/2019 Invoice Date: Amount Due: \$809.88 Amount Enclosed: CREDIT CARDS ACCEPTED

Cardholder's Name: Card Number: Exp. Date: Phone: Billing Address: Zip: Security Code: Signature:





\*1911808.
Invoice #: R-1911808.01

Route #: 207

Invoice Date: 10/22/2019 Invoice #: R-1911808.01

Attn: ERICK FINCH
BIGHORN LAW
9345 W SUNSET RD STE 100
LAS VEGAS, NV 89148
(702) 333-1111

TOTAL INVOICE AMOUNT DUE \$80.00

Date Completed 10/18/2019

Job #: R-1911808.01

Attorney #:

\_ \_ \_ \_ \_ \_

Workorder #: 01888007

Plaintiff: TITINA FARRIS
Defendant: BARRY RIVES
Case Number A-16-739464-C

Documents: PLAINTIFFS' MOTION TO STRIKE DEFENDANTS' TRIAL

Description	Qty	Fee	Total Fee
E-FILE FEE - RUSH	1	\$25.00	\$25.00
		Ψ20.00	ψ2.0.00
PRINTING/COPY FEE	1	\$10.00	\$10.00
EXPEDITE AREA A - ROC TO 2012 HAMILTON LANE - OFFICE WAS CLOSED 10/18/19	1	\$35.00	\$35.00
AREA A - ROC TO 2012 HAMILTON LANE	1	\$10.00	\$10.00
	Job Tota	al Due =	\$80.00
	Job Total	Recd =	-\$0.00

TOTAL INVOICE CHARGES: \$80.00
TOTAL INVOICE PAYMENTS: -\$0.00
TOTAL INVOICE AMOUNT DUE: \$80.00

Legal Wings, Inc., 1118 Fremont St., Las Vegas, NV 89101 Telephone: 702-384-0015, FAX: 702-384-8638, Tax ID: 88-0223382



Invoice #: P-1911696.01

Route #: 207

Due upon receipt Invoice Date: 10/21/2019 Invoice #: P-1911696.01

Attn: ERICK FINCH **BIGHORN LAW** 9345 W SUNSET RD STE 100 LAS VEGAS, NV 89148

**TOTAL INVOICE AMOUNT DUE** \$209.00

Job #: P-1911696.01

Attorney #:

Workorder #:

Plaintiff: TITINA FARRIS, ET AL.

Defendant: BARRY RIVES, M.D., ET AL. Case Number A-16-739464-C

Documents: TRIAL SUBPOENA DUCES TECUM; NEVADA RULES OF

CIVIL PROCEDURE; \$50.00 WITNESS FEE CHECK

Recipient:

ST. ROSE SIENA DOMINICAN

Served 10/21/2019

Person Served: HILDA KRESTYN

3001 ST ROSE PKWY, HENDERSON, NV 89052

Description	Qty Fee	Total Fee
RTVS AREA D	1 \$154.00	\$154.00
CASH ADVANCE	1 \$50.00	\$50.00
CHECK CHARGE	1 \$5.00	\$5.00
	Job Total Due =	\$209.00

**TOTAL INVOICE CHARGES:** 

**TOTAL INVOICE PAYMENTS:** 

**TOTAL INVOICE AMOUNT DUE:** 

\$209.00

\$209.00

Bighorn Law LLC

716 South Jones Blvd Las Vegas, NV 89107 702-333-1111

Legal Wings, Inc

GORS West Twain Ave Las Vegas, NV 89103 16-1606/1220

2120

\$ \*\*209.

Titina Farris (Erick)

Las Vegas, NV 89101

Legal Wings, Inc 1118 Fremont Street

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#003100# \*\* 122016066\*

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Invoice #: P-1911097.01

Route #: 207

Due upon receipt Invoice Date: 10/21/2019 Invoice #: P-1911097.01

Attn: ERICK FINCH **BIGHORN LAW** 9345 W SUNSET RD STE 100 LAS VEGAS, NV 89148

**TOTAL INVOICE AMOUNT DUE** \$180.00

Job #: P-1911097.01

Attorney #:

Workorder #:

Plaintiff: TITINA FARRIS, ET AL. Defendant: BARRY RIVES, M.D., ET AL.

Case Number A-16-739464-C

Documents: TRIAL SUBPOENA; NEVADA RULES OF CIVIL

PROCEDURE; \$50.00 WITNESS FEE CHECK

Recipient:

Served MARY JAYNE LANGAN

10/18/2019

Person Served:

MARY JAYNE LANGAN

10672 BONCHESTER HILL ST, LAS VEGAS, NV 89141

Description	Qtv	Fee	Total Fee
RUSH PROCESS SERVICE AREA F	1	\$125.00	\$125.00
CASH ADVANCE	1	\$50.00	\$50.00
CHECK CHARGE	1	\$5.00	\$5.00
	Job Total	Due =	\$180.00

**TOTAL INVOICE CHARGES:** 

**TOTAL INVOICE PAYMENTS:** 

**TOTAL INVOICE AMOUNT DUE:** 

\$180.00

\$180.00

Bighorn Law LLC 716 South Jones Blvd

Las Vegas, NV 89107 702-333-1111

PAY TO THE ORDER OF \_

Legal Wings, Inc

CITY NATIONAL BANK 6085 West Twain Ave Las Vegas, NV 89103 16-1606/1220

11/13/

Titina Farris (Erick) Invoice No.: P-1911097.01

Legal Wings, Inc 1118 Fremont Street Las Vegas, NV 89101

2260



Invoice #: P-1911694.01

Route #: 207

Due upon receipt Invoice Date: 10/21/2019 Invoice #: P-1911694.01

Attn: ERICK FINCH BIGHORN LAW 9345 W SUNSET RD STE 100 LAS VEGAS, NV 89148

**TOTAL INVOICE AMOUNT DUE** 

\$204.00

Job #: P-1911694.01

Attorney #:

Workorder #:

-----

Plaintiff: TITINA FARRIS, ET AL.

Defendant: BARRY RIVES, M.D., ETAL.

Case Number A-16-739464-C

Documents: TRIAL SUBPOENA DUCES TECUM; NEVADA RULES OF

CIVIL PROCEDURE; \$50.00 WITNESS FEE CHECK

Recipient:

Person Served:

CARE MERIDIAN, PERSON

10/21/2019

Served

KORETTA SHARP 3391 N BUFFALO DR, LAS VEGAS, NV 89129

Description	Qty	Fee	Total Fee
RTVS AREA C	1	\$149.00	\$149.00
CASH ADVANCE	1	\$50.00	\$50.00
CHECK CHARGE	1	\$5.00	\$5.00
	Job Tota	I Due =	\$204.00

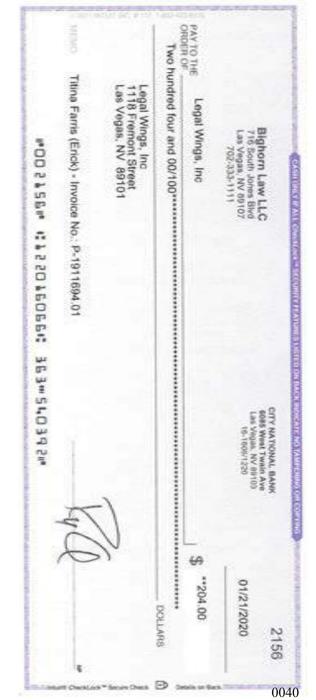
**TOTAL INVOICE CHARGES:** 

**TOTAL INVOICE PAYMENTS:** 

TOTAL INVOICE AMOUNT DUE:

\$204.00

\$204.00





From Dawn Cook Consulting LLC

1001 E Sunset Rd #97553 Las Vegas, NV 89193 Tax ID# 90-1074305

Invoice For Hand & Sullivan, LLC

3442 N Buffalo Dr Las Vegas, NV 89129 Invoice ID 9

938

Issue Date

10/01/2019

Due Date

10/01/2019 (upon receipt)

Subject

Titina Farris and Patrick Farris vs. Barry Rives, M.D.; Laparoscopic Surgery of Nevada, LLC, et al. - Expert Trial

Testimony (Case No. A-16-739464-C)

Item Type	Description	Quantity	Unit Price	Amount
Service	Farris vs. Rives, et al.: Expert Trial Testimony Fee (for trial beginning 10/14/19)	1.00	\$3,000.00	\$3,000.00

Amount Due \$3,000.00

#### Notes

Please make checks payable to: Dawn Cook Consulting LLC 1001 E Sunset Rd #97553 Las Vegas, NV 89193

01/21/2020	\$ **3,000.00	DOLLASS DOLLASS	
orn Law LLC GOTTY NATIONAL BANK 6065 West Twain Ave 606 West Twain			363#540392W
Bighorn Law LLC 716 South Jones Blvd Las Vegas, NV 89107 702-333-1111	Dawn Cook Consulting LLC	Three thousand and 00/100*********************************	# C C S T F F F F F F F F F F F F F F F F F F
	PAY TO THE ORDER OF	Three thou Do 10 10 10 10 10 10 10 10 10 10 10 10 10	



Invoice #: P-1911162.01

Route #: 207

Due upon receipt Invoice Date: 10/17/2019 Invoice #: P-1911162.01

Attn: ERICK FINCH
BIGHORN LAW
9345 W SUNSET RD STE 100
LAS VEGAS, NV 89148

**TOTAL INVOICE AMOUNT DUE** 

\$134.00

-----

Job#: P-1911162.01

Attorney #;

Workorder#:

-----

Plaintiff: TITINA FARRIS, ET AL.

Defendant BARRY RIVES, M.D., ET AL.

Case Number A-16-739464-C

Documents: TRIAL SUBPOENA; NEVADA RULES OF CIVIL

PROCEDURE; \$50.00 WITNESS FEE CHECK

Reciplent:

DR. BESS CHANG

Served 10/15/2019

Person Served:

"JANE DOE", FEMALE, 30's, BLACK HAIR, BROWN EYES.

8530 W SUNSET RD, LAS VEGAS, NV 89113

Description	Qty	Fee	Total Fee
RUSH PROCESS SERVICE AREA D	1	\$79.00	\$79.00
CASH ADVANCE	1	\$50.00	\$50.00
CHECK CHARGE	1	\$5.00	\$5.00
	Job Total	Due =	\$134.00

**TOTAL INVOICE CHARGES:** 

**TOTAL INVOICE PAYMENTS:** 

TOTAL INVOICE AMOUNT DUE:

\$134.00

\$134.00



Invoice #: P-1911092.01

Route #: 207

Due upon receipt Invoice Date: 10/15/2019 Invoice #: P-1911092.01

Attn: ERICK FINCH
BIGHORN LAW
9345 W SUNSET RD STE 100
LAS VEGAS, NV 89148

**TOTAL INVOICE AMOUNT DUE** 

\$129.00

Job #: P-1911092.01

Attorney #:

Workorder #:

Plaintiff: TITINA FARRIS, ET AL.

Defendant: BARRY RIVES, M.D., ET AL.

Case Number A-16-739464-C

Documents: TRIAL SUBPOENA; NEVADA RULES OF CIVIL

PROCEDURE: \$50.00 WITNESS FEE CHECK

Recipient:

NAOMI CHANEY, M.D.

Served 10/14/2019

Person Served: NAOMI CHANEY, M.D.

5380 S RAINBOW BLVD, LAS VEGAS, NV 89118

Description	Qty F∈	e Total Fee
RUSH PROCESS SERVICE AREA C	1 \$74.00	\$74.00
CASH ADVANCE	1 \$50.00	\$50.00
CHECK CHARGE	1 \$5.00	\$5.00
	Job Total Due = _	\$129.00

**TOTAL INVOICE CHARGES:** 

**TOTAL INVOICE PAYMENTS:** 

**TOTAL INVOICE AMOUNT DUE:** 

\$129.00

\$129.00