

IN THE SUPREME COURT OF THE STATE OF NEVADA

LANDS, INC. dba SPRINGSTONE
LAKES MONTESSORI SCHOOL and
SPRINGLANDS LLC

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA
ex rel. THE COUNTY OF CLARK, AND
THE HONORABLE TARA CLARK
NEWBERRY,

Respondent.

JASMIN LAUDIG, a minor, by and
through her father, JOHN LAUDIG,

Real Party In Interest.

Electronically Filed
May 24 2022 04:03 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court No. _____
District Court Case No. _____
A-20-808230-C

PETITIONERS' APPENDIX VOLUME 1 of 4

Karie N. Wilson, Esq. (NBN: 7957)
Tiffanie Bittle, Esq. (NBN:15179)
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy., Ste. 200
Las Vegas, Nevada 89149
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*Attorneys for Petitioners Lands, Inc. dba springstone
Lakes Montessori School and Springlands LLC*

Petitioner's Appendix Volume 1

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Exhibit B	Plaintiff's Motion for Partial Summary Judgment – Filed February 23, 2012	11-105
Exhibit C	Register of Actions for Case No. A-20-808230-C	106-108

Petitioner's Appendix Volume 2

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Exhibit F	Deposition of Plaintiff Jasmin Laudig, conducted on August 5, 2021	126-146
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Exhibit M	Plaintiff's Motion in <i>Limine</i> No. 2, Filed on March 4, 2022	300-309

EXHIBIT A



JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Jordan@TheSchnitzerLawFirm.com
Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG, a minor, by and through her
father, JOHN LAUDIG, an individual;

Plaintiff,

vs.

LANDS, INC., dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic corporation;
SPRINGLANDS LLC, a domestic limited liability
corporation; DOES 1 through 10, and ROE
CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No.: A-20-808230-C

Dept. No.: 21

**PLAINTIFF'S TWELFTH
SUPPLEMENT TO EARLY CASE
CONFERENCE DISCLOSURE
STATEMENT LIST OF DOCUMENTS
AND WITNESSES AND NRCP 16.1
(A)(3) PRE-TRIAL DISCLOSURES**

COMES NOW, Plaintiff JASMIN LAUDIG, by and through her father JOHN LAUDIG,
and by and through their attorney of record, Jordan P. Schnitzer, Esq. of The Schnitzer Law Firm,
hereby submits the following Early Case Conference Disclosure Statement Pursuant to the NRCP
16.1 and further submits the following information as Plaintiff's NRCP 16.1 (a)(3) Pre-Trial
Disclosures, as Plaintiff intends to introduce the following documents and witnesses at the trial
of this matter.

I.

LIST OF WITNESSES PLAINTIFF EXPECTS TO PRESENT AT TRIAL

1. Jasmin Laudig
c/o THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, NV 89148



1 Jasmin Laudig is the Plaintiff in the above-captioned matter and, in that capacity, and has
2 personal knowledge as to the facts and circumstances of the allegations in the complaint.

3 2. Yasemin Laudig
4 c/o THE SCHNITZER LAW FIRM
5 9205 W. Russell Road, Suite 240
6 Las Vegas, NV 89148

7 Yasemin Laudig is the mother of the Plaintiff in the above-captioned matter and, in that
8 capacity, and has personal knowledge as to the facts and circumstances of the allegations in the
9 complaint.

10 3. John Laudig
11 c/o THE SCHNITZER LAW FIRM
12 9205 W. Russell Road, Suite 240
13 Las Vegas, NV 89148

14 John Laudig is the father of the Plaintiff in the above-captioned matter and, in that
15 capacity, and has personal knowledge as to the facts and circumstances of the allegations in the
16 complaint.

17 4. Person Most Knowledgeable
18 LANDS, INC. dba SPRINGSTONE LAKES
19 MONTESSORI SCHOOL
20 c/o Karie N. Wilson, Esq.
21 Alverson Taylor & Sanders
22 6605 Grand Montecito Parkway, Suite 200
23 Las Vegas, Nevada 89149

24 LANDS, INC. dba SPRINGSTONE LAKES MONTESSORI SCHOOL is a Defendant
25 in the above-captioned matter and, in that capacity, and has personal knowledge as to the facts
26 and circumstances of the allegations in the complaint.

27 5. Person Most Knowledgeable
28 SPRINGLANDS LLC
c/o Karie N. Wilson, Esq.
Alverson Taylor & Sanders
6605 Grand Montecito Parkway, Suite 200
Las Vegas, Nevada 89149

SPRINGLANDS LLC is a Defendant in the above-captioned matter and, in that capacity,
and has personal knowledge as to the facts and circumstances of the allegations in the complaint.



1 6. W. Tracey Hankins, MD
2 Person(s) Most Knowledgeable and/or
3 Custodian of Records
4 Hankins & Sohn Plastic Surgery Associates
5 60 North Pecos Road
6 Henderson, NV 89074
7 (702) 891-1330

8 7. John J. Kim, MD
9 Person(s) Most Knowledgeable and/or
10 Custodian of Records
11 Shadow Emergency Physicians, PLLC
12 1000 River Road, Suite 100
13 Conshohocken, PA 19428
14 (800) 355-2470

15 8. John J. Kim, MD
16 Rachel D. Lovera, RN
17 Corrie Rocco, RN
18 Person(s) Most Knowledgeable and/or
19 Custodian of Records
20 Summerlin Hospital
21 657 N. Town Center Drive
22 Las Vegas, NV 89144
23 (702) 233-7580

24 Witnesses for the above medical providers are expected to testify with regard to the care,
25 treatment, prognosis, records and billing of the Plaintiff, JASMIN LAUDIG, surrounding the
26 subject incident.

27 9. Shimrit Yonsay
28 shimrit.yonasy@gmail.com
29 (702) 502-0927

30 Shimrit Yonsay is the mother of one of Plaintiff classmates at the time of the incident in
31 the above-captioned matter and, in that capacity, and has personal knowledge as to the facts and
32 circumstances of the allegations in the complaint.

33 10. Eliana Adiv
34 c/o her mother Shimrit Yonsay
35 shimrit.yonasy@gmail.com
36 (702) 502-0927

37 Eliana Adiv was a classmate of Plaintiff at the time of the incident in the above-captioned
38 matter and, in that capacity, and has personal knowledge as to the facts and circumstances of the

1 allegations in the complaint.

2 11. Amber Beach
3 Unknown

4 Amber Beach is the mother of one of Plaintiff classmates at the time of the incident in the
5 above-captioned matter and, in that capacity, and has personal knowledge as to the facts and
6 circumstances of the allegations in the complaint.

7 12. Lux Beach
8 c/o her mother Amber Beach
9 Unknown

10 Lux Beach was a classmate of Plaintiff at the time of the incident in the above-captioned
11 matter and, in that capacity, and has personal knowledge as to the facts and circumstances of the
12 allegations in the complaint.

13 13. Oliver Hopkins
14 c/o his parent or guardian
15 Unknown

16 Oliver Hopkins was a classmate of Plaintiff at the time of the incident in the above-
17 captioned matter and, in that capacity, and has personal knowledge as to the facts and
18 circumstances of the allegations in the complaint.

19 14. Anca Sora
20 (702) 839-8346

21 Anca Sora was one of Plaintiff's teachers at the time of the incident in the above-captioned
22 matter and, in that capacity, and has personal knowledge as to the facts and circumstances of the
23 allegations in the complaint.

24 15. Michelle DeSoto
25 c/o Karie N. Wilson, Esq.
26 Alverson Taylor & Sanders
27 6605 Grand Montecito Parkway, Suite 200
28 Las Vegas, Nevada 89149

Ms. Soto is a teacher at SPRINGSTONE LAKES MONTESSORI SCHOOL and was the
teacher that responded to the incident in the above-captioned matter and, in that capacity, and has
personal knowledge as to the facts and circumstances of the allegations in the complaint.

//

- 1 16. R.P. Phelps
2 Jefferey Anderson
3 Phelps Consulting Group LLC
4 PO Box 75170
5 Las Vegas, NV 89136

6 R.P. Phelps is a Retained Expert and will provide expert opinions and testimony as to his
7 opinion and comparison to The Industry standard of care regarding safe walkways and safety
8 management in an environment and operation for an establishment within the industry,
9 specifically, that Defendant fell below the standard of care. Jefferey Anderson conducted the site
10 inspection and took the photos at that site inspection.

- 11 17. Person(s) Most Knowledgeable and/or
12 Custodian of Records
13 International Code Council, Inc.
14 500 New Jersey Avenue, NW 6th Floor
15 Washington, DC 20001

16 International Code Council, Inc. is the leading global source of model codes and standards
17 and building safety solutions and will provide testimony as to the International Building Code
18 and International Property Maintenance Code.

- 19 18. Person(s) Most Knowledgeable and/or
20 Custodian of Records
21 City of Las Vegas, Nevada
22 Las Vegas Building & Safety
23 495 S Main Street
24 Las Vegas, NV 89101

- 25 19. Person(s) Most Knowledgeable and/or
26 Custodian of Records
27 Southern Nevada Building Officials
28 240 S Water Street
 Henderson, NV 89009

 The above witnesses implement and enforce building and maintenance code in Las Vegas,
Nevada and will provide testimony as to building code adoption ordinances to the International
Building Code.

20. Person(s) Most Knowledgeable and/or
Custodian of Records
U.S. Consumer Products Safety Commission
4330 East West Highway
Bethesda, MD 20814

1 U.S. Consumer Products Safety Commission is a government agency that published the
2 Public Playground Safety Handbook and will provide testimony as to the Public Playground
3 Safety Handbook

4 21. Person(s) Most Knowledgeable and/or
5 Custodian of Records
6 International Playground Safety Institute
7 10611 Winding Stream Way
8 Bradenton, Florida 34212

9 International Playground Safety Institute is an organization that provides a Certified
10 Training for Playground Safety Inspectors and will provide testimony as to their Certified
11 Training Program for Playground Safety Inspectors.

12 **II.**

13 **LIST OF WITNESSES PLAINTIFF**

14 **EXPECTS TO PRESENT AT TRIAL IF THE NEED ARISES**

15 No disclosures at this time. Plaintiff reserves the right to supplement this list as the
16 discovery process continues.

17 Plaintiff reserves the right to designate as witnesses all parties, any witnesses designated
18 by any party, as well as any person whose identity becomes known in the course of discovery.

19 **III.**

20 **LIST OF WITNESSES WHO HAVE BEEN SUBPOENAED**

21 No disclosures at this time. Plaintiff reserves the right to supplement this list as the
22 discovery process continues.

23 Plaintiff reserves the right to designate as witnesses all parties, any witnesses designated
24 by any party, as well as any person whose identity becomes known in the course of discovery.

25 **IV.**

26 **LIST OF WITNESSES PLAINTIFF EXPECTS TO**
27 **PRESENT AT TRIAL VIA DEPOSITION TESTIMONY**

28 No disclosures at this time. Plaintiff reserves the right to supplement this list as the
discovery process continues.

Plaintiff reserves the right to designate as witnesses all parties, any witnesses designated by any party, as well as any person whose identity becomes known in the course of discovery.

V.

LIST OF DOCUMENTS AND EXHIBITS PLAINTIFF

EXPECTS TO PRESENT AT TRIAL

41. Photos;

- **Bates Stamp: PHOTOS 0000020-000023**

Plaintiff specifically reserves the right to supplement the above list of documents as information becomes known.

VI.

DEMONSTRATIVE EVIDENCE

1. Plaintiffs may offer at trial certain exhibits for demonstrative purposes, including but not limited to the following:

- a. Video, storyboards and/or power point images, blow-ups and/or transparencies of exhibits.
- b. Diagrams and/or models of the human body specifically related to the Plaintiff's injuries.
- c. Samples of the hardware related to any of Plaintiff's treatment.
- d. Photographs and videos of actual and/or sample surgical procedures and/or other diagnostic tests.
- e. Actual diagnostic studies.
- f. Samples of tools used in surgical procedures.
- g. Diagrams, drawings, pictures, photos, films, video, DVD and CD ROM of various parts of the human body, diagnostic tests and surgical procedures.
- h. All x-ray images, MRI images, films or other imaging images, which may be printed or may require proprietary viewing software.
- I. Power point images/drawings/diagrams/animations/story boards/ photographs of parties, providers, and/or other witnesses.

As discovery is continuing, Plaintiff reserves the right to supplement its list of demonstrative evidence.

VII.

COMPUTATION OF DAMAGES CLAIMED BY PLAINTIFF

1. Shadow Emergency Physicians, PLLC	\$ 1,532.00
2. Summerlin Hospital	\$ 522.00
TOTAL:	\$ 2,054.00

FUTURE TREATMENT

Dr. W. Tracy Hankins at Hankins and Sohn Plastic Surgery Associates recommended a surgical revision of her initial wound due to the animation deformity. This would need to be performed under general anesthesia, and the costs for this surgery, including surgery center, anesthesia, surgeon's fees and all follow-up care would be \$13,800.00.

ADDITIONAL DAMAGES


1. For a sum to be determined by the trier of fact for past and future pain and suffering;
2. For a sum to be determined by the trier of fact for past and future physical and mental pain, suffering, anguish and disability;
3. For a sum to be determined by the trier of fact for loss of enjoyment of life pursuant to *Banks v. Sunrise Hosp.*, 120 Nev. 822, 836 (2004);
4. For reasonable attorney's fees, costs and interest for having prosecute this matter;
5. For such other and further relief as this Court deems just and proper.

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1 Plaintiff specifically reserves the right to supplement this computation of damages as
2 information becomes known.

3 DATED this 18th day of January 2022.

4
5 THE SCHNITZER LAW FIRM

6
7 By: 
8 JORDAN P. SCHNITZER, ESQ.
9 Nevada Bar No. 10744
10 9205 W. Russell Road, Suite 240
11 Las Vegas, Nevada 89148
12 Telephone: (702) 960-4050
13 Facsimile: (702) 960-4092
14 *Attorney for Plaintiff*





CERTIFICATE OF SERVICE

In accordance with Rule 9 of the N.E.F.C.R., I, the undersigned hereby certify that on the 18th day of January 2022, I served a true and correct copy of the foregoing **PLAINTIFF'S TWELFTH SUPPLEMENT TO EARLY CASE CONFERENCE DISCLOSURE STATEMENT LIST OF DOCUMENTS AND WITNESSES AND NRCP 16.1 (a)(3) PRE-TRIAL DISCLOSURES** to the above-entitled Court for electronic filing and service upon the Court's Service List to the following counsel:

J. BRUCE ALVERSON, ESQ.
Nevada Bar No. 1339
KARIE N. WILSON, ESQ.
Nevada Bar No. 7957
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy, Ste. 200
Las Vegas, NV 89149


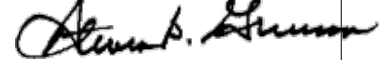
BY: 
An employee of
THE SCHNITZER LAW FIRM

EXHIBIT B



JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Jordan@TheSchnitzerLawFirm.com
Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG, a minor, by and through her
father, JOHN LAUDIG, an individual;

Plaintiff,

vs.

LANDS, INC. dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic
corporation; SPRINGLANDS LLC, a domestic
limited liability corporation; DOES 1 through 10,
and ROE CORPORATIONS 1 through 20,
inclusive,

Defendants.

Case No.: A-20-808230-C

Dept. No.: 21


**PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

HEARING REQUESTED

Plaintiff, JASMIN LAUDIG, by and through his attorney of record Jordan P. Schnitzer,
Esq. of The Schnitzer Law Firm; hereby submit their Motion for Partial Summary Judgment

This Motion is made based pleadings and papers on file herein, the attached Memorandum
of Points and Authorities, the declaration of Jordan P. Schnitzer Esq. attached hereto as **Exhibit 1**
the exhibits attached hereto, and any oral argument that the Court may entertain on the matter.

DATED this 23rd day of February 2022.

BY: 
JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Attorney for Plaintiff



MEMORANDUM OF POINTS AND AUTHORITES

I. INTRODUCTION

Partial summary judgment must be granted in favor of Plaintiff regarding:

1. Causation of past medical specials;
2. Reasonableness and customary nature of past medical specials; and
3. Reasonableness and customary nature of future medical specials.

Defendant has not disclosed an expert disputing the amount of medical bills, past or future. As a result, recent Nevada Supreme Court case law in *Didier* mandates this Court enter partial summary judgment in favor of Plaintiff on the three undisputed issues, above.

II. STATEMENT OF UNDISPUTED MATERIAL FACTS:

1. Plaintiff fell while playing with other kids near a fence gate surrounding the recess area where there was a sharp, pointed part that pierced Plaintiff's cheek. *See* Plaintiff's Responses to Interrogatories, Interrogatory No. 2 and No. 3, attached as **Exhibit 2**, Incident Report attached as **Exhibit 3**, and photos attached as **Exhibit 4**.
2. Plaintiff timely disclosed the treating providers as experts who will testify regarding the past and future medical bills being reasonable and customary, as well as the treatment being related to the subject crash, which is also partially reflected in the medical records. **Exhibit 5** and **Exhibit 6**.
3. The following past medical bills and associated records were disclosed, each documenting causation related to the subject crash:

1. Shadow Emergency Physicians, PLLC	\$ 1,532.00
2. Summerlin Hospital	\$ 522.00
TOTAL:	\$ 2,054.00
4. The following future medical specials were also disclosed as reasonable and customary:

Dr. W. Tracy Hankins at Hankins and Sohn Plastic Surgery Associates recommended a surgical revision of her initial wound due to the animation deformity. This would need to be performed under general anesthesia, and the costs for this surgery, including surgery center, anesthesia, surgeon's fees and all follow-up care would be \$13,800.00. See **Exhibit 7**.

5. Defendant did not disclose any expert to dispute the necessity or amount of the medical treatment and bills. See Defendant's Expert Disclosure attached as **Exhibit 8**.

6. The expert deadline expired on July 20, 2021.

III. LEGAL ARGUMENT

a. SUMMARY JUDGMENT STANDARD

Summary Judgment is appropriate when the pleadings, depositions, answers to interrogatories, admissions and affidavits, if any, that are properly before the Court demonstrate that no genuine issue of material fact exist, and the moving party is entitled to judgment as a matter of law. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 713, 57 P.3d 82, 87 (2002). Substantive law controls whether factual disputes are material and will preclude summary judgment; other factual disputes are irrelevant. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 106 S.Ct. 2505, 91 L.Ed.2d 202 (1986). A genuine issue of material fact is one where the evidence is such that a reasonable jury could return a verdict for the non-moving party. *Valley Bank v. Marble*, 105 Nev. 366, 367, 775 P.2d 1278, 1282 (1989).

The Nevada Supreme Court has held that the non-moving party may not defeat a Motion for Summary Judgment by relying "on gossamer threads of whimsy, speculation and conjecture." *Wood v. Safeway*, 121 Nev. 724, 732, 121 P.3d 1026, 1031 (2005). The Nevada Supreme Court has also made it abundantly clear when a Motion for Summary Judgment is made and supported as required by Nevada Rule of Civil Procedure 56, the non-moving party must not rest upon general allegations and conclusions, but must by affidavit or otherwise set forth specific facts demonstrating the existence of a genuine factual issue. *Id.*

The pleadings and proof offered in a Motion for Summary Judgment are construed in the light most favorable to the non-moving party. *Hoopes v. Hammargren*, 102 Nev. 425, 429, 725

P.2d 238, 241 (1986). However, the non-moving party still “bears the burden to ‘do more than simply show that there is some metaphysical doubt’ as to the operative facts in order to avoid summary judgment being entered.” *Wood*, 121 Nev. at 732, 121 P.3d at 1031.

The non-moving party bears the burden to set forth specific facts demonstrating the existence of a "genuine" issue for trial or have summary judgment entered against him. *Collins v. Union Federal Savings & Loan*, 99 Nev. 284, 294, 662 P.2d 610, 618-619 (1983). When there is no genuine issue of material fact and the non-moving party provides no admissible evidence to the contrary, summary judgment is “mandated.” *Celotex Corp. v. Catrett*, 477 US 317, 322 (1986).

b. The Supreme Court’s Recent *Didier* Decision Mandates Summary Judgment in Favor of Plaintiff

The Nevada Supreme Court, in the recent May 31, 2019 opinion of *Didier v. Sotolongo* provided the following analysis of this exact scenario. It stated the following:

It follows that where a plaintiff presents an expert opinion establishing causation and damages for a subjective injury to a reasonable degree of medical probability, **the defendant must thereafter provide an expert opinion that would tend to rebut the plaintiff’s position. Stated another way, a defendant may not rely on layperson testimony to rebut an expert’s opinion establishing causation for the injury and damages.**

Didier v. Sotolongo, 76289, 2019 WL 2339970, at *2 (Nev. May 31, 2019), unpublished (emphasis added).

In *Didier*, the trial court found the Plaintiff had established causation and damages as a matter of law with regard to certain medical treatment and costs because the Defendant presented no expert evidence to contradict the testimony of the plaintiff’s treating doctors. On appeal, the Nevada Supreme Court affirmed the decision.

Similarly here, Plaintiff has established medical causation and the reasonableness and customary nature for her past treatment and injury. Plaintiff has also established the necessity and reasonableness and customary nature of past and future medical specials. Further, Defendant has not produced any expert testimony to the contrary. As a result, partial summary judgment is required on:


1. Causation of past medical specials;
2. Reasonableness and customary nature of past medical specials in the amount of \$2,054.00;
3. Causation of future medical specials; and
4. Reasonableness and customary nature of future medical specials in the amount of \$13,800.00.

IV. CONCLUSION

Based upon the foregoing, *Didier* mandates this Court enter partial summary judgment because Defendant does not have an expert to contradict Plaintiff's treating providers regarding:

1. Causation of past medical specials;
2. Reasonableness and customary nature of past medical specials in the amount of \$2,054.00;
3. Causation of future medical specials; and
4. Reasonableness and customary nature of future medical specials in the amount of \$13,800.00.

DATED this 23rd day of February 2022.

BY: 
 JORDAN P. SCHNITZER, ESQ.
 Nevada Bar No. 10744
 THE SCHNITZER LAW FIRM
 9205 W. Russell Road, Suite 240
 Las Vegas, Nevada 89148
Attorney for Plaintiff

CERTIFICATE OF SERVICE

In accordance with Rule 9 of the N.E.F.C.R., I, the undersigned hereby certify that on the 23rd day of February 2022, I served a true and correct copy of the foregoing **PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** to the above-entitled Court for electronic service upon the Court's Service List to the following counsel:

J. Bruce Alverson, Esq.
Karie N. Wilson, Esq.
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy, Suite 200
Las Vegas, NV 89149
Attorneys for Defendants



An employee of
THE SCHNITZER LAW FIRM



Electronically Filed
2/23/2022 3:11 PM
Steven D. Grierson
CLERK OF THE COURT

JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Jordan@TheSchnitzerLawFirm.com
Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG, a minor, by and through her
father, JOHN LAUDIG, an individual;

Plaintiff,

vs.

LANDS, INC. dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic
corporation; SPRINGLANDS LLC, a domestic
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and ROE CORPORATIONS 1 through 20,
inclusive,

Defendants.

Case No.: A-20-808230-C

Dept. No.: 21

**INDEX OF EXHIBITS TO
PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Plaintiff, JASMIN LAUDIG, by and through her attorney of record Jordan P. Schnitzer,
Esq. of The Schnitzer Law Firm; hereby submit their Index of Exhibits to Motion for Partial
Summary Judgment


DATED this 23rd day of February 2022.

BY:
JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Attorney for Plaintiff

**INDEX OF EXHIBITS TO PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

EXHIBIT	DESCRIPTION
1	Declaration of Jordan P. Schnitzer, Esq.
2	Plaintiff's Responses to Defendant's First Interrogatories
3	Springstone Montessori School Injury Report - Bates Stamp: INJURY REPORT 000001
4	Photographs of Injury; - Bates Stamp: PHOTOS 000002, 000004, 000012, 000017, and 000020
5	Plaintiff's Designation of Expert Witnesses
6	Plaintiff's Medical Records; - Bates Stamp: SHADOW EMERGENCY BILLING 000001 and SUMMERLIN HOSPITAL 000001-000046
7	W. Tracy Hankins, MD Future Treatment Recommendation; - Bates Stamp: HANKINS & SOHN FUTURE TREATMENT REC 000001
8	Defendant's Designation of Expert Witnesses

DATED this 23rd day of February 2022.

BY: 
JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Attorney for Plaintiff



CERTIFICATE OF SERVICE

In accordance with Rule 9 of the N.E.F.C.R., I, the undersigned hereby certify that on the 23rd day of February 2022, I served a true and correct copy of the foregoing **INDEX OF EXHIBITS TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** to the above-entitled Court for electronic service upon the Court's Service List to the following counsel:

J. Bruce Alverson, Esq.
Karie N. Wilson, Esq.
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy, Suite 200
Las Vegas, NV 89149
Attorneys for Defendants

An employee of
THE SCHNITZER LAW FIRM



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Exhibit 1



**DECLARATION OF JORDAN P. SCHNITZER, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, JORDAN P. SCHNITZER, ESQ., declare as follows:

1. I am a licensed attorney in good standing and am admitted to practice law in all Courts in the State of Nevada.

2. I am the founding attorney with The Schnitzer Law Firm. (hereinafter the "Firm").

3. That this firm has been retained to represent Plaintiff, JASMIN LAUDIG in the instant matter.

4. That I have personal knowledge of the matters stated forth in this Declaration and could testify as a competent witness if called upon to do so.

5. That I am making this Declaration in good faith on behalf of Plaintiff's Motion for Partial Summary Judgment.

6. **Exhibit 2** is a true and correct copy of Plaintiff's Responses to Defendant's First Interrogatories.

7. **Exhibit 3** is a true and correct copy of Springstone Montessori School Injury Report. Bates Stamp: INJURY REPORT 000001.

8. **Exhibit 4** is a true and correct copy of photographs of Plaintiff's injury. Bates Stamp: PHOTOS 000002, 000004, 000012, 000017, and 000020.

9. **Exhibit 5** is a true and correct copy of Plaintiff's Designation of Expert Witnesses.

10. **Exhibit 6** is a true and correct copy of Plaintiff's Medical Records. Bates Stamp: SHADOW EMERGENCY BILLING 000001 and SUMMERLIN HOSPITAL 000001-000046.

11. **Exhibit 7** is a true and correct copy of W. Tracy Hankins, MD Future Treatment Recommendation. Bates Stamp: HANKINS & SOHN FUTURE TREATMENT REC 000001.

12. **Exhibit 8** is a true and correct copy of Defendant's Designation of Expert Witnesses.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 23rd day of February 2022.



JORDAN P. SCHNITZER, ESQ.



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Exhibit 2

JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Jordan@TheSchnitzerLawFirm.com
Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG a minor, by and through
her father, JOHN LAUDIG, an individual;

Plaintiff,

vs.

LANDS, INC., dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic
corporation; SPRINGLANDS LLC, a domestic
limited liability corporation; DOES 1 through
10, and ROE CORPORATIONS 1 through 20,
inclusive,

Defendants.

Case No.: A-20-808230-C

Dept. No.: 1

PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST INTERROGATORIES

COMES NOW, Plaintiff, JASMIN LAUDIG, by and through their counsel, The Schnitzer Law Firm, and for their responses to Defendant, LANDS INC., First Set of Interrogatories to Plaintiff, states:

GENERAL OBJECTIONS TO INTERROGATORIES

Plaintiff by and through her counsel, objects to Defendant's Interrogatories on the basis that the definitions, explanatory notes and instructions are so complex, numerous and burdensome that they create an unreasonable and undue burden upon it. In addition, the definitions, explanatory notes and instructions cause the Interrogatories and Requests to reach an objectionable breadth, ambiguity, complexity and vagueness, and call for information and/o documents which are irrelevant, not calculated to lead to the discovery of admissible evidence, protected by the



1 attorney/client privilege or attorney work product doctrine and are beyond the permissible scope
2 of discovery.

3 Plaintiff further objects to any answers or responses protected by the attorney/client
4 privilege, or the attorney work product doctrine.

5 Plaintiff further objects to any answers or responses irrelevant to the subject matter of this
6 action and not reasonably calculated to lead to the discovery of admissible evidence.

7 No response, nor subsequent response, constitutes a waiver of any other objection pursuant to these
8 Interrogatories and requests, or to other similar requests that may be propounded at a later time.

9 Subject to the general objections made above, Plaintiff responds to each Interrogatory as
10 follows:

11 **INTERROGATORY NO. 1:**

12 Please state all names by which you have been known, your present address, date of birth,
13 and social security number.

14 **RESPONSE TO INTERROGATORY 1:**

15 Jasmin Pera Laudig, [REDACTED], Las Vegas, NV 89135, [REDACTED] 2012, XXX-
16 XX-9124.

17 **INTERROGATORY NO. 2:**

18 Please describe in detail how the incident alleged in your Complaint occurred, including
19 specific identification of where, when, and how Plaintiff allegedly fell.

20 **RESPONSE TO INTERROGATORY 2:**

21 We got a call from the Montessori School that Jasmin had fallen on the ground while
22 playing during her recess. John picked her up from school and she had a medical glove filled with
23 ice pressed up against her face and her shirt was bloody. We moved the glove and saw a hole in
24 the middle of her cheek. We cleaned it and took pictures and took her to the emergency room. The
25 doctor said she was injured by a pointed object piercing her face. The ER surgeon came to look
26 over the injury and decided to use medical glue to close up the wound. After that, the next day we
27 went back to the school and asked for some more details about what happened. The receptionist at
28 the time, Jenny Lee, informed us that she had "hit the ground" while they were playing by the gate.

1 She said there was a report, but they never gave me the report they wrote. I called a few other
2 Mother's of students in class with Jasmin, while Jasmin was in the ER. Amber Beech, mother of
3 Lux Beech told us that her child, Jasmin and a few other kids were running back and forth playing
4 by the gate. Lux told his mother that Jasmin fell against the gate and there was a lot of blood. A
5 few days later I ran into a teacher from the school at Target, Ms. Anca and she said that she was
6 sorry and confirmed that Jasmin must have hit the gate.

7 **INTERROGATORY NO. 3.:**

8 If you contend the subject incident occurred as the result of an allegedly "dangerous"
9 condition on Defendant's premises, please state with specificity what you alleged to be the
10 dangerous condition.

11 **RESPONSE TO INTERROGATORY 3:**

12 The gate surrounding the recess area had a sharp, pointed part that pierced her cheek.

13 **INTERROGATORY NO. 4.:**

14 If you contend Defendant had prior notice of the allegedly dangerous condition, please
15 state the basis for this belief, including whether, when, and how you notified Defendant of the
16 allegedly dangerous condition.

17 **RESPONSE TO INTERROGATORY 4:**

18 Discovery is ongoing, however, upon information and belief, the condition of the fence
19 existed prior to this incident.

20 **INTERROGATORY NO. 5:**

21 If you contend that you informed Defendant of an allegedly dangerous condition, please
22 identify: (a) the names of the individual(s) you informed; (b) when and where each notification
23 was made to each individual; and (c) the substance of the notification or information you conveyed.

24 **RESPONSE TO INTERROGATORY 5:**

25 Please see response to Interrogatory No. 2.

26 **INTERROGATORY NO. 6:**

27 Please identify all current or former employees of Defendant who have been interviewed
28 by or on behalf of Plaintiff with regard to this lawsuit and/or the incident alleged in your

Complaint.

RESPONSE TO INTERROGATORY 6:

Please see response to Interrogatory No. 2.

INTERROGATORY NO. 7:

If you contend that Defendant, or any employee, agent or representative thereof, has made any statement or admission, whether oral, written, or recorded, which supports the allegations in your Complaint, please identify (a) the name of the individual making the statement or admission and his or her relationship to Defendant; (b) when and where the statement or admission was made; (c) the individual or individuals present when the statement or admission was made; and (d) the substance of the statement or admission.

RESPONSE TO INTERROGATORY 7:

Please see Interrogatory No. 2. Additionally, Ms. Anka and I ran into each other at Target and that when we spoke about Jasmin. She said she was sorry, and she was sure Jasmin hit the gate.

INTERROGATORY NO. 8:

Identify all persons known to you, or based upon your knowledge, information or belief, who: (a) were eyewitnesses to the incident; (b) were with you in the 24 hours preceding the incident; (c) came to the incident scene at the time of the incident, or within the following 24 hours; and (d) were police officers, fire department personal, doctors, EMT personnel, ambulance attendants, or other persons who treated or talked with you at the scene of the incident alleged in your Complaint.

RESPONSE TO INTERROGATORY 8:

Objection, this request is compound. Without waiving said objection, please see response to Interrogatory No. 2. Also, the school did not call us right away so we can't know who was there at that moment. Also, they never gave me a report, so I don't have that information. All other information regarding medical treatment has already been given. Please see Bates Stamps SHADOW EMERGENCY BILLING 000001, and SUMMERLIN HOSPITAL 000001-000046.

//

1 **INTERROGATORY NO. 9:**

2 Please identify each person who to your knowledge, information, or belief has any
3 knowledge or information regarding the facts or circumstances which are the subject matter of
4 your Complaint, including but not limited to any issues of negligence, liability, causation, injuries,
5 and/or damages.

6 **RESPONSE TO INTERROGATORY 9:**

7 The children who were there, Ms. Michelle (Jasmin's teacher), Jenny Lee and Ms. Anka.

8 **INTERROGATORY NO.: 10:**

9 Please state the identity (name, address, and telephone number) of every treating, attending
10 or consulting physician, psychologist, psychiatrist, therapist, healthcare professional, or any other
11 person administering any type or form of healthcare or healing arts for any physical or mental
12 injury, illness, complaint, or condition that JASMIN LAUDIG alleges to have suffered as a result
13 of the incident alleged in your Complaint.

14 **RESPONSE TO INTERROGATORY 10:**

15 Objection, this request seeks information protected by attorney-work product with respect
16 to consulting doctors. Any non-privileged providers have been disclosed pursuant to NRCP 16.1.

17 **INTERROGATORY NO. 11:**

18 Describe in detail the medical expenses you incurred as a result of the incident in question,
19 including but not limited to a statement of the amount of damages claimed.

20 **RESPONSE TO INTERROGATORY NO. 11:**

21 Please see NRCP 16.1 disclosures.

22 **INTERROGATORY NO. 12:**

23 If any healthcare provider has advised that JASMIN LAUDIG requires future or additional
24 treatment for any injuries that you attribute to the subject incident, please state for each injury the
25 name and address of each healthcare provider, and the nature, duration, and estimated cost of the
26 treatment.

27 **RESPONSE TO INTERROGATORY NO. 12:**

28 Please see Bates Stamps HANKINS AND SOHN FUTURE TREATMENT 000001.

INTERROGATORY NO. 13:

Please state in detail any and all of JASMIN LAUDIG's injuries, illnesses, or psychiatric/psychological disorders or conditions requiring treatment or examination by a physician, psychologist, psychiatrist, therapist, healthcare professional or any other person administering any type or form of healthcare or healing arts within the five (5) years preceding the subject incident, and state the names and addresses of each medical provider.

RESPONSE TO INTERROGATORY NO. 13:

Objection, this request is overbroad and not proportional to the needs of the case. Without waiving said objection, Jasmin was 4 at the time of the injury. She had no major medical issues at all until this incident.

INTERROGATORY NO. 14:

With respect to any payments or benefits which are available or which have been made to JASMIN LAUDIG by any source for injuries or any other alleged losses arising from the subject incident, please state the amount and payee of each benefit; the name and address of the person, insurance company, corporation or other entity making each payment or benefit available; and the nature of each payment or benefit made (e.g. medical payment benefits, Workers' Compensation, group or individual disability benefits, group or individual medical coverage, coverage provided by a policy provided by the U.S. or state government, Medicare, Medicaid, or Social Security, etc.). This interrogatory is propounded in order to comply with the Medicare reporting requirements mandated by Section 111 of the Medicare and Medicaid Extension Act of 2007.

RESPONSE TO INTERROGATORY NO. 15:

Objection, this request inappropriately seeks collateral source information.

INTERROGATORY NO. 15:

If you have ever applied for or received any benefits from Medicare or Medicaid at any time, whether prior to or after the incident that is the subject of your Complaint, please identify the date(s) on which you applied for these benefits and the date you first received benefits. This request is propounded in order to comply with the Medicare reporting requirements mandated by Section 111 of the Medicare and Medicaid Extension Act of 2007.

RESPONSE TO INTERROGATORY NO. 15:

N/A.

INTERROGATORY NO. 16:

If you have ever applied for or received any benefits from Social Security Administration at any time, whether prior to or after the incident that is the subject of your Complaint, please identify the date(s) which you applied for benefits or the date you first received benefits from the Social Security Administration.

RESPONSE TO INTERROGATORY NO. 16:

N/A.

INTERROGATORY NO. 17:

If you are a member of or belong to any social networking websites (i.e. MySpace, Facebook, Twitter, Instagram, etc.), provide all such website information, including but not limited to the name of the networking website, any and all screen names, registered and/or utilized, the date you became a member of each website, and the last time you logged on to each website.

RESPONSE TO INTERROGATORY NO. 17:

Objection, this request is neither relevant nor likely to lead to the discovery of admissible evidence.

INTERROGATORY NO. 18:

If you have ever maintained or utilized a blog or website related to your individual activities, interests, and/or hobbies, provide all information related to the same, including the URL, any individuals or companies who have maintained the same, and the date each blog website was established.

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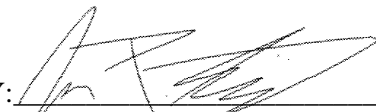


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RESPONSE TO INTERROGATORY NO. 18:

Objection, this request is neither relevant nor likely to lead to the discovery of admissible evidence.

DATED this 4th day of September 2020.

BY: 
JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Attorney for Plaintiff



1 **CERTIFICATE OF SERVICE**

2 In accordance with Rule 9 of the N.E.F.C.R., I, the undersigned hereby certify that on
3 the 4th day of September 2020, I served a true and correct copy of the foregoing **PLAINTIFF'S**
4 **RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES** to the above-
5 entitled Court for service upon the Court's Service List for the above-referenced case to the
6 following counsel:

7 J. BRUCE ALVERSON, ESQ.
8 Nevada Bar No. 1339
9 KARIE N. WILSON, ESQ.
10 Nevada Bar No. 7957
11 ALVERSON TAYLOR & SANDERS
12 6605 Grand Montecito Pkwy, Ste. 200
13 Las Vegas, NV 89149
14 *Attorneys for Defendants*

15 An employee of
16 THE SCHNITZER LAW FIRM

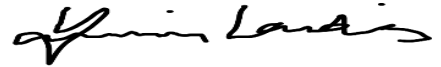
VERIFICATION

STATE OF NEVADA

) SS.:

COUNTY OF CLARK

The undersigned, YASEMIN LAUDIG, under penalties of perjury, declares that they are the Mother of the Plaintiff; they have read the foregoing PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES and knows the contents thereof; the same is true of their own personal knowledge, except for those matters therein contained upon information and belief, and as to those matters, they believe them to be true.



YASEMIN LAUDIG



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Exhibit 3



Injury Report

Date: 2/13/17

Child's Name:	Jasmin Landig
Time of Incident:	4:20
Nature of Injury:	fell, gash on cheek
Additional Information: While outside Jasmin was running when she fell. When she was approaching the teacher, I noticed her holding her cheek and bleeding.	
Response and first aid given:	took to office for immediate first aid, applied ice.
Teacher that responded:	Michela
Parent contacted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Which Parent: Mom Jasmine
How parent was contacted:	<input checked="" type="checkbox"/> Phone <input type="checkbox"/> Email Time: 4:20pm
Who contacted parent:	Kristen Lavachek
Does the child need to be picked up?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date parent messaged to sign report	2/13/17

Michelle Dato
Teacher Signature

Kristen Lavachek
Administration Signature

[Signature]
Parent Signature

When the incident/accident is more serious in nature, fax a copy of the report to Child Care Licensing Fax #(702) 486-6660.



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Exhibit 4













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Exhibit 5



JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Jordan@TheSchnitzerLawFirm.com
Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG, a minor, by and through her
father, JOHN LAUDIG, an individual;

Plaintiff,

vs.

LANDS, INC., dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic corporation;
SPRINGLANDS LLC, a domestic limited liability
corporation; DOES 1 through 10, and ROE
CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No.: A-20-808230-C

Dept. No.: 21

**PLAINTIFF'S DESIGNATION OF
EXPERT WITNESSES**

COMES NOW, Plaintiff JASMIN LAUDIG, by and through her counsel, THE
SCHNITZER LAW FIRM, and submits the following her Designation of Expert Witnesses as
follows:

RETAINED EXPERT:

1. R.P. Phelps
Jefferey Anderson
Phelps Consulting Group LLC
P.O. Box 751750
Las Vegas, NV 89136

R.P. Phelps and Jefferey Anderson are construction and maintenance experts. R.P. Phelps
is a licensed general contractor with over 40 years of experience. Mr. Phelps also is a licensed
insurance adjuster, Member of the ICC (International Code Council). Jefferey Anderson conducted
the site inspection and took the photos at that site inspection. Mr. Phelps is a retained expert and

will provide expert opinions and testimony as to his opinion and comparison to The Industry standard of care regarding safe premises and construction in environments such as the one at issue within the Industry, specifically, that Defendant fell below the standard of care. See Mr. Phelps's expert report attached hereto as **Exhibit "1"**, Bates Stamp: **EXPERT PHELPS 000001-000003** and **Exhibit "2"**, Bates Stamp: **EXPERT PHELPS 000004-000006**

The bases of Mr. Phelps's opinions include, but are not limited to, his education, training and experience, any scholarly articles addressed in his report or any other documents identified in his report. Mr. Phelps reserves the right to amend and/or supplement his expert report and opinions pending review of additional records, items and testimony in this matter.

This statement of the subject matter of his testimony and the summary of facts and opinions is for the purpose of expert disclosure only and is not intended to be a complete statement of all opinions to be expressed, the basis or reasons therefor, or of the data or other information considered by the witness in forming the opinions.

Each of his opinions as described above is expected to be provided to a reasonable degree of certainty. Mr. Phelps's CV, Testimony List and fee schedule are attached hereto as **Exhibit "3"**, Bates Stamp: **PHELPS 000001-000009**

NON-RETAINED EXPERTS

1. John J. Kim, MD
Rachel D. Lovera, RN
Corrie Rocco, RN
Person(s) Most Knowledgeable and/or
Custodian of Records
Summerlin Hospital
657 N. Town Center Drive
Las Vegas, NV 89144

John J. Kim, MD, Rachel D. Lovera, RN, and Corrie Rocco, RN, are medical professionals at Summerlin Hospital. They provided care and treatment to Plaintiff for injuries sustained in the subject incident. They will provide testimony regarding the diagnosis and prognosis of Plaintiff, treatment rendered, the amounts billed, and opinions formed during the course of treatment as partially set forth in Bates Stamp: **SUMMERLIN 000001-000046**. They are expected to provide expert testimony relating to and in accordance with his review of Plaintiff's medical records, their medical chart, any documents reviewed outside of their medical chart, opinions regarding past

medical care and/or treatment, and opinions regarding Plaintiff's need for future care and/or treatment, including the treatment of other medical providers. They will also provide opinions regarding the causation of Plaintiff's injuries and the necessity and reasonableness of Plaintiff's past and future medical expenses. They will also provide testimony in defense of any criticism of their treatment and may review materials as part of any such rebuttal.

They treated Plaintiff on 2/14/2017 and the records from any future treatment will be disclosed. They will testify about their observations of Plaintiff, conversations with Plaintiff, the diagnosis[es] of Plaintiff, including but not limited to,

- Laceration of right cheek
- Animation deformity which requires surgical revision to release the scar from the underlying tissues and reclose the wound in layers. Due to Plaintiff's age the surgical revision would need to be performed under general anesthesia. The cost for surgery, including surgery center, anesthesia, surgeon's fee and follow up is \$13,800.

that the cause of those injuries/conditions and symptoms associated with such injuries/conditions was the incident of 2/13/2017, that such injuries/conditions make Plaintiff more susceptible to future injuries and pain, that the past, current, and future treatment for those injuries is reasonable and necessary. They will also testify that the testing and treatment from Summerlin Hospital, Shadow Emergency Physicians, and Hankins and Sohn Plastic Surgery Associates was reasonable, necessary and related to the incident, that the injuries/conditions caused pain, suffering, and anguish, and that the injuries and conditions caused limitations and restrictions of daily activities, including work activities.

They will also testify about the reasonableness of their charges, the charges of any facility utilized by them, the charges of any providers where they referred Plaintiff, the charges of providers where Plaintiff was referred to them and all other medical providers including those set forth in Plaintiff's computation of damages, currently as follows:

Provider	Date(s) Of Service	Amount
Summerlin Hospital	2/14/17	\$522.00
Shadow Emergency Physicians, PLLC	2/14/17	\$1,532.00
Hankins and Sohn Plastic Surgery Associates	11/15/18	
TOTAL		\$2,054.00

1 This statement of the subject matter of John J. Kim, MD, Rachel D. Lovera, RN, and
2 Corrie Rocco, RN's testimony, and the summary of facts and opinions is for the purpose of
3 disclosing a non-retained expert witness under N.R.C.P. 16.1 (a)(2)(B) and is not intended to be a
4 complete statement of all opinions to be expressed, the basis or reasons therefor, or of the data or
5 other information considered by the witness in forming the opinions.

6 It is anticipated that their testimony in this matter will be based upon their training,
7 education and experience in their area(s) of practice and/or expertise, set forth above, in the
8 community(ies) they practices, as well as the local community where this action takes place and
9 their familiarity with community standards of reasonable billing for like or similar services
10 rendered.

11 This statement of the subject matter of their testimony and the summary of facts and
12 opinions is for the purpose of expert disclosure only and is not intended to be a complete statement
13 of all opinions to be expressed, the basis or reasons therefor, or of the data or other information
14 considered by the witness in forming the opinions.

15 Each of their opinions as described above is expected to be provided to a reasonable
16 degree of medical certainty. Their CV and fee schedule will be furnished upon receipt. It is
17 estimated that their hourly rate will be the same or similar as other similar professionals with
18 similar education, training and experience.

19 2. John J. Kim, MD
20 Person(s) Most Knowledgeable and/or
21 Custodian of Records
22 Shadow Emergency Physicians, PLLC
23 1000 River Road, Suite 100
24 Conshohocken, PA 19428

25 John J. Kim, MD, is a medical professional at Shadow Emergency Physicians,
26 PLLC. They provided care and treatment to Plaintiff for injuries sustained in the subject incident.
27 They will provide testimony regarding the diagnosis and prognosis of Plaintiff, treatment
28 rendered, the amounts billed, and opinions formed during the course of treatment as partially set
forth in Bates Stamp: **SHADOW EMERGENCY BILLING 000001**. They are expected to
provide expert testimony relating to and in accordance with his review of Plaintiff's medical
records, their medical chart, any documents reviewed outside of their medical chart, opinions

regarding past medical care and/or treatment, and opinions regarding Plaintiff's need for future care and/or treatment, including the treatment of other medical providers. They will also provide opinions regarding the causation of Plaintiff's injuries and the necessity and reasonableness of Plaintiff's past and future medical expenses. They will also provide testimony in defense of any criticism of their treatment and may review materials as part of any such rebuttal.

They treated Plaintiff on 2/14/2017 and the records from any future treatment will be disclosed. They will testify about their observations of Plaintiff, conversations with Plaintiff, the diagnosis[es] of Plaintiff, including but not limited to,

- Laceration of right cheek
- Animation deformity which requires surgical revision to release the scar from the underlying tissues and reclose the wound in layers. Due to Plaintiff's age the surgical revision would need to be performed under general anesthesia. The cost for surgery, including surgery center, anesthesia, surgeon's fee and follow up is \$13,800.

that the cause of those injuries/conditions and symptoms associated with such injuries/conditions was the incident of 2/13/2017, that such injuries/conditions make Plaintiff more susceptible to future injuries and pain, that the past, current, and future treatment for those injuries is reasonable and necessary. They will also testify that the testing and treatment from Summerlin Hospital, Shadow Emergency Physicians, and Hankins and Sohn Plastic Surgery Associates was reasonable, necessary and related to the incident, that the injuries/conditions caused pain, suffering, and anguish, and that the injuries and conditions caused limitations and restrictions of daily activities, including work activities.

They will also testify about the reasonableness of their charges, the charges of any facility utilized by them, the charges of any providers where they referred Plaintiff, the charges of providers where Plaintiff was referred to them and all other medical providers including those set forth in Plaintiff's computation of damages, currently as follows:

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Hankins and Sohn Plastic Surgery Associates	11/15/18	
TOTAL		\$2,054.00

1 This statement of the subject matter of John J. Kim, MD's testimony, and the summary of
2 facts and opinions is for the purpose of disclosing a non-retained expert witness under N.R.C.P.
3 16.1 (a)(2)(B) and is not intended to be a complete statement of all opinions to be expressed, the
4 basis or reasons therefor, or of the data or other information considered by the witness in forming
5 the opinions.

6 It is anticipated that their testimony in this matter will be based upon their training,
7 education and experience in their area(s) of practice and/or expertise, set forth above, in the
8 community(ies) they practices, as well as the local community where this action takes place and
9 their familiarity with community standards of reasonable billing for like or similar services
10 rendered.

11 This statement of the subject matter of their testimony and the summary of facts and
12 opinions is for the purpose of expert disclosure only and is not intended to be a complete statement
13 of all opinions to be expressed, the basis or reasons therefor, or of the data or other information
14 considered by the witness in forming the opinions.

15 Each of their opinions as described above is expected to be provided to a reasonable
16 degree of medical certainty. Their CV and fee schedule will be furnished upon receipt. It is
17 estimated that their hourly rate will be the same or similar as other similar professionals with
18 similar education, training and experience.

19 3. W. Tracey Hankins, MD
20 Person(s) Most Knowledgeable and/or
21 Custodian of Records
22 Hankins & Sohn Plastic Surgery Associates
23 60 North Pecos Road
24 Henderson, NV 89074

25 W. Tracey Hankins, MD, is a medical professional at Hankins & Sohn Plastic Surgery
26 Associates. They provided care and treatment to Plaintiff for injuries sustained in the subject
27 incident. They will provide testimony regarding the diagnosis and prognosis of Plaintiff, treatment
28 rendered, the amounts billed, and opinions formed during the course of treatment as partially set
forth in Bates Stamp: **HANKINS & SOHN FUTURE TREATMENT REC 000001**. They are
expected to provide expert testimony relating to and in accordance with his review of Plaintiff's
medical records, their medical chart, any documents reviewed outside of their medical chart,

opinions regarding past medical care and/or treatment, and opinions regarding Plaintiff's need for future care and/or treatment, including the treatment of other medical providers. They will also provide opinions regarding the causation of Plaintiff's injuries and the necessity and reasonableness of Plaintiff's past and future medical expenses. They will also provide testimony in defense of any criticism of their treatment and may review materials as part of any such rebuttal.

They treated Plaintiff on 11/15/18 and the records from any future treatment will be disclosed. They will testify about their observations of Plaintiff, conversations with Plaintiff, the diagnosis[es] of Plaintiff, including but not limited to,

- Laceration of right cheek
- Animation deformity which requires surgical revision to release the scar from the underlying tissues and reclose the wound in layers. Due to Plaintiff's age the surgical revision would need to be performed under general anesthesia. The cost for surgery, including surgery center, anesthesia, surgeon's fee and follow up is \$13,800.

that the cause of those injuries/conditions and symptoms associated with such injuries/conditions was the incident of 2/13/2017, that such injuries/conditions make Plaintiff more susceptible to future injuries and pain, that the past, current, and future treatment for those injuries is reasonable and necessary. They will also testify that the testing and treatment from Summerlin Hospital, Shadow Emergency Physicians, and Hankins and Sohn Plastic Surgery Associates was reasonable, necessary and related to the incident, that the injuries/conditions caused pain, suffering, and anguish, and that the injuries and conditions caused limitations and restrictions of daily activities, including work activities.

They will also testify about the reasonableness of their charges, the charges of any facility utilized by them, the charges of any providers where they referred Plaintiff, the charges of providers where Plaintiff was referred to them and all other medical providers including those set forth in Plaintiff's computation of damages, currently as follows:

Provider	Date(s) Of Service	Amount
Summerlin Hospital	2/14/17	\$522.00
Shadow Emergency Physicians, PLLC	2/14/17	\$1,532.00
Hankins and Sohn Plastic Surgery Associates	11/15/18	
TOTAL		\$2,054.00

This statement of the subject matter of W. Tracey Hankins, MD's testimony, and the summary of facts and opinions is for the purpose of disclosing a non-retained expert witness under N.R.C.P. 16.1 (a)(2)(B) and is not intended to be a complete statement of all opinions to be expressed, the basis or reasons therefor, or of the data or other information considered by the witness in forming the opinions.


It is anticipated that their testimony in this matter will be based upon their training, education and experience in their area(s) of practice and/or expertise, set forth above, in the community(ies) they practices, as well as the local community where this action takes place and their familiarity with community standards of reasonable billing for like or similar services rendered.

This statement of the subject matter of their testimony and the summary of facts and opinions is for the purpose of expert disclosure only and is not intended to be a complete statement of all opinions to be expressed, the basis or reasons therefor, or of the data or other information considered by the witness in forming the opinions.

Each of his opinions as described above is expected to be provided to a reasonable degree of certainty. W. Tracey Hankins, MD's CV, Testimony List and fee schedule are attached hereto as **Exhibit "4"**, Bates Stamp: **HANKINS 000001-000004**

DATED this 20th day of July 2021.

THE SCHNITZER LAW FIRM

By: 
JORDAN P. SCHNITZER, ESQ.
Nevada Bar No. 10744
9205 W. Russell Road, Suite 240
Las Vegas, Nevada 89148
Telephone: (702) 960-4050
Facsimile: (702) 960-4092
Attorney for Plaintiff



1 **CERTIFICATE OF SERVICE**

2 In accordance with Rule 9 of the N.E.F.C.R., I, the undersigned hereby certify that on the
3 20th day of July 2021, I served a true and correct copy of the foregoing **PLAINTIFF'S**
4 **DESIGNATION OF EXPERT WITNESSES** to the above-entitled Court for electronic filing
5 and service upon the Court's Service List to the following counsel:

6 J. BRUCE ALVERSON, ESQ.
7 Nevada Bar No. 1339
8 KARIE N. WILSON, ESQ.
9 Nevada Bar No. 7957
10 ALVERSON TAYLOR & SANDERS
11 6605 Grand Montecito Pkwy, Ste. 200
12 Las Vegas, NV 89149
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BY: _____
An employee of
THE SCHNITZER LAW FIRM



Exhibit 6

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PETAPP000052

HCT # 1			SUMMERLIN HOSP MED CTR			PAGE NO. 1	
TYPE OF BILL			DATE OF BILL			DATE OF PREV. BILL	
CYCLE 02/19/17			INS.			89144-0023	
LAS VEGAS, NV			866 823-4250			BIRTH-DATE	
FEI # 23-2939047						HOSP. NO.	

H	T	PATIENT NAME	PATIENT NUMBER	SEX	AGE	ADMISSION DATE	DISCHARGE DATE	DAYS	OUT PATIENT
		LAUDIG, JASMIN PERA	13825690	F	4	02/14/17			

GUAR PH: (702)556-7496

GUARANTOR NAME AND ADDRESS	JOHN MICHAEL LAUDIG	INSURANCE COMPANY NAME	GROUP NUMBER	POLICY NUMBER
		SIERRA HPN		06011150302

AMOUNT OF PAYMENT	\$
-------------------	----

DATE OF SERVICE	DESCRIPTION OF HOSPITAL SERVICES	SERVICE CODE	TOTAL CHARGES	EST. COVERAGE INS.CO. NO. 1	EST. COVERAGE INS.CO. NO. 2	EST. COVERAGE INS.CO. NO. 3	EST. COVERAGE INS.CO. NO. 4	PATIENT AMOUNT
	DETAIL OF CURRENT CHARGES, PAYMENTS AND ADJUSTMENTS							
02/14	43022201 001 99282		522.00	522.00				
	3MLEVEL 2 ED W/O PROCEDURES							
02/14	43034958 001							
	ER STATISTICAL CHARGE							
02/14	88811492 001		150.00					150.00-
	VISA CARD PAYMENT							
	SUMMARY OF CURRENT PAY/ADJ		150.00					150.00-
	SUMMARY OF CURRENT CHARGES EMERGENCY ROOM		522.00	522.00				
	SUB-TOTAL OF CURR. CHARGES		522.00	522.00				
	EMPLOYER INFORMATION:							
	CENTERRA							
	UNKNOWN							
	LAS VEGAS NV 89125							
	GUAR RELATIONSHIP: F							
	ACC DATE: 02/13/17							
	DIAGNOSIS: S01.411A							
	S01.411A							
	SEX: M							
	TIME: 5:00 PM							
	PLACE: OF RIGHT CHEEK AND TMJ AREA							
	EMPL REL: N							
	LACERATION W/O FB OF RIGHT CHEEK AND TMJ AREA							
	LACERATION W/O FB OF RIGHT CHEEK AND TMJ AREA							
	AMOUNTS DUE HEREUNDER HAVE BEEN ASSIGNED TO SUMMERLIN HOSPITAL RECEIVABLES, L.L.C.							

TOTALS	372.00	522.00					150.00-
PATIENT NUMBER	13825690	PLEASE REFER TO PATIENT NUMBER ON ALL INQUIRIES AND CORRESPONDENCE.	ADDITIONAL PATIENT BILLING MAY BE NECESSARY FOR ANY CHARGES NOT POSTED WHEN THIS STATEMENT WAS PREPARED, OR IF INSURANCE CARRIERS DO NOT PAY ANY PART OF THE AMOUNTS SHOWN UNDER ESTIMATED INSURANCE COVERAGE.				

SUMMERLIN HOSP MED CTR
LAS VEGAS, NV

SHM- Summerlin Hospital Medical Center
657 Town Center Drive
Las Vegas, NV 89144-6367

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575

Admit: 2/14/2017
Disch: 2/14/2017 Disch Time: 05:55 PST
FIN: SHM0000013825690

DOB/Sex: [REDACTED]/2012 / Female

Attending: Kim MD, John J

Allergies

Substance	Allergy Type	Reaction Symptom	Reviewed Date/Time	Reaction Status
No Known Allergies	Allergy		2/14/2017 03:16 PST	Active

Medical Record

Print Date/Time 11/9/2018 09:21 PST

Report Request ID: 352007601

Page 1 of 57

PETAPP000054

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Facesheets

DOCUMENT NAME: Facesheets
SERVICE DATE/TIME: 2/14/2017 00:00 PST
RESULT STATUS: Unauth
PERFORM INFORMATION:
SIGN INFORMATION:

FACE SHEET REGISTRATION FORM_20170214.pdf

Please click on link to see image.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: ■■■/2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Admission

DOCUMENT NAME:

Admission

SERVICE DATE/TIME:

2/14/2017 00:00 PST

RESULT STATUS:

Auth (Verified)

PERFORM INFORMATION:

SIGN INFORMATION:

INSURANCE CARD AND PT IDENTIFICATION_20170214.pdf

Please click on link to see image.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Patient Education Notes

DOCUMENT NAME:	ED Education - Text
SERVICE DATE/TIME:	2/14/2017 05:53 PST
RESULT STATUS:	Auth (Verified)
PERFORM INFORMATION:	Lovera RN, Rachel D (2/14/2017 05:53 PST)
SIGN INFORMATION:	Lovera RN, Rachel D (2/14/2017 05:53 PST)

ED Education Needs Entered On: 2/14/2017 5:54 PST
Performed On: 2/14/2017 5:53 PST by Lovera RN, Rachel D

Education History

Learning Needs : No Data Available
Education History : Education

No Data Available

Lovera RN, Rachel D - 2/14/2017 5:53 PST

Education

Home Caregiver Present for Session : Yes
Responsible Learner(s) : No Data Available
Teaching Method : Explanation, Printed materials
Barriers To Learning : None evident

Lovera RN, Rachel D - 2/14/2017 5:53 PST

General Education Peds Ongoing

Recognition of Symptoms : Verbalizes understanding
Symptom Control : Verbalizes understanding

Lovera RN, Rachel D - 2/14/2017 5:53 PST

ED Safety/Infection Control Ed Grid

Hand Washing : Verbalizes understanding
Hygiene : Verbalizes understanding
Signs of Infection : Verbalizes understanding

Lovera RN, Rachel D - 2/14/2017 5:53 PST

ED Post Hospitalization Education Grid

Disease Process : Verbalizes understanding
Follow-Up Care/Appointment : Verbalizes understanding
Potential Complications : Verbalizes understanding
When to Call Health Care Provider : Verbalizes understanding

Lovera RN, Rachel D - 2/14/2017 5:53 PST

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: [REDACTED] 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017

FIN: SHM0000013825690

Emergency Department

2/14/2017 05:55 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

ED Clinical Summary
2/14/2017 05:55 PST
Auth (Verified)
Lovera RN, Rachel D (2/14/2017 05:55 PST)
Lovera RN, Rachel D (2/14/2017 05:55 PST)

ED Clinical Summary

SHM- Summerlin Hospital Medical Center
657 Town Center Drive
Las Vegas, NV 89144-6367
<http://www.summerlinhospital.com/>
(702) 233-7000

SUMMARY OF CARE

This document contains CONFIDENTIAL health information that is legally privileged. Please be sure to take this document to your follow-up appointment so that your provider has access to the necessary information about your recent hospitalization.

Patient Information:

Name: LAUDIG, JASMIN PERA	Age: 4 Years	DOB: [REDACTED] 2012 12:00 AM
Sex: Female	Language: ENG-English	PCP: Nyarko MD, Michael O
MRN: SHM4882575	FIN: SHM0000013825690	FC:
Arrival Date: 2/14/2017 3:11 AM	Disposition: ED Home, Routine	Discharge: 2/14/2017 5:54 AM
Diagnosis: Laceration of cheek, right		ED Depart Time: 2/14/2017 5:54 AM

Visit Summary For JASMIN LAUDIG

We would like to thank you for allowing us to assist you with your healthcare needs. Our entire staff strives to provide an excellent experience for our patients and their families. The following includes information regarding your visit.

Age: 4 years **Sex:** Female **DOB:** 06/02/2012 **MRN:** 4882575
Address: 1302 SURREY DOWNS LN LAS VEGAS, NV 891351315
Home: 7025567496 **Work:** -- **Mobile:** --
Primary Care Provider: Nyarko MD, Michael O
Race: White **Ethnicity:** Non-Hispanic
Language: ENG-English
Health Plan: --

Problems

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

No Problems Documented

Follow Up

With:	Address:	When:
Michael Nyarko, PED	10105 BANBURY CROSS DR, SUITE 370 LAS VEGAS, NV 891440000 (702)260-4525 Business (1)	Within 5-7 days

Care Team

Attending: ED, Staff Physician

Admitting: ED, Staff Physician

Consulting:

Allergies

No Known Allergies

Medical Information

Prescriptions Given to Patient/Caregiver(s):

Home Medications per Patient/Caregiver(s):

Smoking Status

Never smoker

Functional Status

Mode of Discharge: Ambulates without assistance

Home Equipment:

Print Date/Time 11/9/2018 09:21 PST

Medical Record

Page 13 of 57

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Emergency Department

Level of Consciousness:

Affect/Behavior:

Activities of Daily Living:

Care Plan

Patient Education Information:

Instructions Provided:

LACERATION, Face (Dermabond)

Physician Documentation / Notes:

Patient: **LAUDIG, JASMIN PERA** MRN: **SHM4882575** FIN: **SHM0000013825690**
 Age: **4 years** Sex: **Female** DOB: **06/02/12**
 Associated Diagnoses: **Laceration of cheek, right**
 Author: **Kim, John J MD**

Basic Information

Time seen: Date & time 02/14/17 05:34:00, Provider Assignment
 Kim, John J MD assigned at 02/14/2017 04:21

History source: Patient.

History limitation: None.

Additional information: Chief Complaint from Nursing Triage Note : Chief Complaint
 02/14/17 03:17 PST Chief Complaint Fell at 1700 at preschool. Hit right cheek on the ground.
 Cleaned and steri strips applied.

History of Present Illness

The patient presents with facial injury. The onset was 12 hours ago. The course/duration of symptoms is constant. Type of injury: fall, laceration and direct blow. The location where the incident occurred was at school. Prior episodes: none.

Fell at home and hit her cheek on the ground. Patient had a laceration to the right cheek which her mother put Steri-Strips over. Concerned about adequacy of closure..

Review of Systems

Constitutional symptoms: Negative except as documented in HPI.

Skin symptoms: Negative except as documented in HPI.

ENMT symptoms: Negative except as documented in HPI.

Respiratory symptoms: Negative except as documented in HPI, No shortness of breath,

Cardiovascular symptoms: Negative except as documented in HPI, No chest pain,

Gastrointestinal symptoms: Negative except as documented in HPI, No abdominal pain,

Genitourinary symptoms: Negative except as documented in HPI.

Musculoskeletal symptoms: Negative except as documented in HPI.

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Emergency Department

Neurologic symptoms: Negative except as documented in HPI.

Psychiatric symptoms: Negative except as documented in HPI.

Additional review of systems information: All other systems reviewed and otherwise negative.

Health Status

Allergies:

Allergic Reactions (Selected)

No Known Allergies, Per nurse's notes.

Medications: Review/Insert Medication List (Selected)

, Per nurse's notes.

Immunizations: Per nurse's notes.

Past Medical/ Family/ Social History

Medical history

Reviewed as documented in chart.

Medical history: Include medical history

No active or resolved past medical history items have been selected or recorded., PMH/Problems ST
 No problems documented.

, Reviewed as documented in chart.

Surgical history:

No active procedure history items have been selected or recorded..

Family history:

No family history items have been selected or recorded., Reviewed as documented in chart.

Social history: Drug use: Denies.

Social history: Social History ST

Social & Psychosocial Habits

Tobacco

02/14/2017 **Smoking History:** Never smoker.

Problem list: Per nurse's notes.

Physical Examination

Vital Signs

Vital Signs (ST)

<u>Vital Signs (24 hrs)</u>	<u>Last Charted</u>	<u>Minimum</u>	<u>Maximum</u>
Temp	36.6 (FEB 14 03:15)	36.6 (FEB 14 03:15)	36.6 (FEB 14 03:15)
Apical Heart Rate	85 (FEB 14 03:15)	85 (FEB 14 03:15)	85 (FEB 14 03:15)
SpO2	99 (FEB 14 03:15)	99 (FEB 14 03:15)	99 (FEB 14 03:15)
	Room air	Room air	Room air

Measurements

02/14/17 03:17 PST

Height Method Measured
 BSA Measured 0.5 m2
 Body Mass Index Measured 92.63 kg/m2

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

02/14/17 03:17 PST	Height	46 cm
	Weight	19.6 kg
	Daily Weight kg	19.6 kg
	Weight Method	Measured
	Weight Method	Measured

Basic Oxygen Information

02/14/17 03:15 PST	Oxygen Therapy	Room air
	SpO2	99 %

Physician interpretation of pulse oximetry: Normal.

General: Alert, no acute distress.

Skin: steri strips removed. patient has an irregular wound of r cheek, shallow.

Eye: Extraocular movements are intact.

Ears, nose, mouth and throat: Oral mucosa moist.

Cardiovascular

Respiratory: Respirations are non-labored.

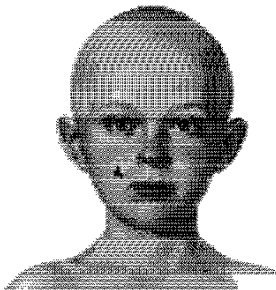
Gastrointestinal: Soft.

Musculoskeletal: No deformity.

Neurological: Alert and oriented to person, place, time, and situation, No focal neurological deficit observed.

Lymphatics

Psychiatric: Cooperative, appropriate mood & affect.



Medical Decision Making

Orders Review/Insert Order Profile (Selected)

Inpatient Orders

Ordered

ED Reassessment:

Vital Signs Mobile:

Canceled

ED Triage Mobile:

Completed

ED Nursing Exam: .

Procedure

Laceration repair

Confirmed: Time-out taken prior to procedure.

Consent: Patient, Has given verbal consent.

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

Description/ repair

Laceration 1 cm in length. Face: right, cheek.
Shape: irregular.
Depth: subcutaneous.
Details: clean.
Neurovascular/ tendon exam: intact.
Preparation: sterile field established, H2O2.
Irrigation: minimal, with saline.
Debridement: none.
Skin closure: Dermabond.
Complexity: single layer.
No Anesthesia.

Post procedure exam: Circulation, motor, sensory examination intact, Bleeding controlled.

Complications: None.

Patient tolerated: Well.

Performed by: Self.

Total time: 30 minutes.

Impression and Plan

Laceration of cheek, right - ICD10-CM S01.411A,

Plan

Condition: Stable.

Patient was given the following educational materials: LACERATION, Face (Dermabond).

Follow up with: Michael Nyarko, PED Within 5-7 days.

Counseled: Family.

Disposition: Launch Disposition Order

Admit/Transfer/Discharge:

Discharge Request (Order): 02/14/17 05:38 PST, Home Routine.

2/14/2017 05:55 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

ED Patient Education Note
2/14/2017 05:55 PST
Modified
Lovera RN, Rachel D (2/14/2017 05:55 PST)
Lovera RN, Rachel D (2/14/2017 05:55 PST); Kim, John J MD
(2/14/2017 05:38 PST)

ED Patient Education Note

Trauma

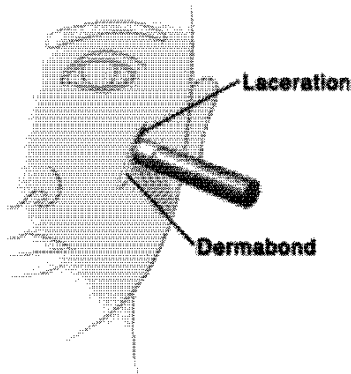
Laceration, Face (Skin Glue)

A laceration is a cut through the skin. A laceration on your face has been closed with a type of skin glue.

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department



Home Care

Medications: Acetaminophen (Tylenol) or ibuprofen (Motrin, Advil) may be taken for pain, unless another pain medicine was prescribed. **NOTE:** If you have chronic liver or kidney disease or ever had a stomach ulcer or GI bleeding, talk with your doctor before using these medications.

General Care:

- Keep the wound clean and dry. You may shower or bathe as usual, but do not use soaps, lotions, or ointments on the wound area. Do not scrub the wound. After bathing, pat the wound dry with a soft towel.
- Do not scratch, rub, or pick at the film. Do not place tape directly over the film.
- Do not apply liquids (such as peroxide), ointments, or creams to the wound while the film is in place.
- Most facial skin wounds heal without problems. However, an infection sometimes occurs despite proper treatment. Therefore, watch for the signs of infection listed below.

Follow Up

as directed by the doctor or our staff. The skin glue film will fall off naturally in 5 to 10 days.

Get Prompt Medical Attention

if any of the following occur:

- Signs of infection:
- Fever of 100.4°F (38°C) or higher, or as directed by your healthcare provider

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

- Increasing pain in the wound
- Increasing redness or swelling
- Pus coming from the wound
- Wound bleeds more than a small amount or bleeding doesn't stop
- Wound edges come apart

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2/14/2017 05:55 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

ED Patient Summary
2/14/2017 05:55 PST
Auth (Verified)
Lovera RN, Rachel D (2/14/2017 05:55 PST)
Lovera RN, Rachel D (2/14/2017 05:55 PST)

ED Patient Summary

SUMMERLIN HOSPITAL MEDICAL CENTER

Confirmation of Receipt of Instructions

Name: LAUDIG, JASMIN PERA

Age: 4 Years Date of Birth: 6/02/2012 12:00 AM

MRN: SHM4882575 FIN: Arrival Time: 2/14/2017 3:11 AM

Diagnosis: Laceration of cheek, right

Patient Visit Summary:

LAUDIG, JASMIN PERA has been provided patient education materials, follow-up instructions and prescriptions.

My Signature Below Indicates:

- > I have received and understood the oral instructions regarding my current medical problem.
- > I will arrange follow-up care as instructed, outlined in this and any following page(s).
- > I acknowledge continuing medications prescribed by my regular doctor.
- > I acknowledge receipt of the written instructions as outlined in this and any previous page(s).
- > I will read and review these instructions.
- > I acknowledge that I will contact my Primary Care Physician or return to the Emergency Department immediately if symptoms worsen or persist.

() Patient Refuses to Sign

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

- () Patient Left Without Signing
() Patient was informed of their non-emergent status

Patient Signature

Parent / Guardian (if patient is a minor)

Nurse Signature (if not patient signature)

Hospital Witness Signature (if no patient signature)

NOTE: Permanent Medical Record

SUMMERLIN HOSPITAL MEDICAL CENTER

657 Town Center Drive, Las Vegas, NV 89144

www.summerlinhospital.com

(702) 233-7000

Name: LAUDIG, JASMIN PERA

Age: 4 Years Date of Birth: 6/02/2012 12:00 AM

MRN: SHM4882575 FIN: Arrival Time: 2/14/2017 3:11 AM

Diagnosis: Laceration of cheek, right

Emergency Department Care Team:

Provider: ED, Staff Physician; Kim, John J MD

The Emergency Department physician has reviewed the information that you have provided concerning medications that have been prescribed previously and found there to be no conflict with any therapy recommended by the Emergency Department physicians. Unless instructed by the Emergency Department physician to discontinue specific medications, you should continue medications prescribed by your regular doctor and follow-up with your doctor or with the physician/facility recommended by the ED as appropriate.

If you plan on operating a motor vehicle or using any dangerous equipment within the next several hours, please check with your physician or nurse to make sure that none of the medicines that you received in the Emergency Department could interfere with your performance of these tasks.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

The physicians and staff of the Summerlin Hospital Medical Center encourage you to lead a healthy lifestyle. If you smoke, we strongly urge you to quit. Contact your local American Lung Association for additional information.

Allergies:

No Known Allergies

Vaccination/Immunologic Information

Prescriptions Given to Patient/Caregiver(s):

Medication Special Considerations:

Patient Education Materials Provided:

LACERATION, Face (Dermabond)

Comment:

Follow-up Instructions:

With:

Michael Nyarko, PED

Address:

10105 BANBURRY CROSS DR,
SUITE 370 LAS VEGAS, NV
891440000
(702)260-4525 Business (1)

When:

Within 5-7 days

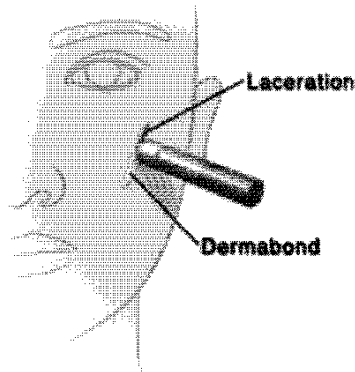
Laceration, Face (Skin Glue)

A laceration is a cut through the skin. A laceration on your face has been closed with a type of skin glue.

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department



Home Care

Medications: Acetaminophen (Tylenol) or ibuprofen (Motrin, Advil) may be taken for pain, unless another pain medicine was prescribed. **NOTE:** If you have chronic liver or kidney disease or ever had a stomach ulcer or GI bleeding, talk with your doctor before using these medications.

General Care:

- Keep the wound clean and dry. You may shower or bathe as usual, but do not use soaps, lotions, or ointments on the wound area. Do not scrub the wound. After bathing, pat the wound dry with a soft towel.
- Do not scratch, rub, or pick at the film. Do not place tape directly over the film.
- Do not apply liquids (such as peroxide), ointments, or creams to the wound while the film is in place.
- Most facial skin wounds heal without problems. However, an infection sometimes occurs despite proper treatment. Therefore, watch for the signs of infection listed below.

Follow Up

as directed by the doctor or our staff. The skin glue film will fall off naturally in 5 to 10 days.

Get Prompt Medical Attention

if any of the following occur:

- Signs of infection:

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

- Fever of 100.4°F (38°C) or higher, or as directed by your healthcare provider
- Increasing pain in the wound
- Increasing redness or swelling
- Pus coming from the wound
- Wound bleeds more than a small amount or bleeding doesn't stop
- Wound edges come apart

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Major Tests and Procedures:

The following procedures and tests were performed during your ED visit.

Laboratory Orders

No laboratory orders were placed.

Radiology Orders

No radiology orders were placed.

Cardiology Orders

No cardiology orders were placed.

2/14/2017 05:33 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

ED Physician Record
2/14/2017 05:33 PST
Auth (Verified)
Kim, John J MD (2/14/2017 05:38 PST)
Kim, John J MD (2/14/2017 05:38 PST)

Injury of face

Patient: **LAUDIG, JASMIN PERA** MRN: **SHM4882575** FIN: **SHM0000013825690**
Age: **4 years** Sex: **Female** DOB: **06/02/12**
Associated Diagnoses: **Laceration of cheek, right**
Author: **Kim, John J MD**

Basic Information

Time seen: Date & time 02/14/17 05:34:00, Provider Assignment
Kim, John J MD assigned at 02/14/2017 04:21

History source: Patient.

History limitation: None.

Additional information: Chief Complaint from Nursing Triage Note : Chief Complaint

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Emergency Department

02/14/17 03:17 PST Chief Complaint Fell at 1700 at preschool. Hit right cheek on the ground.
 Cleaned and steri strips applied.

History of Present Illness

The patient presents with facial injury. The onset was 12 hours ago. The course/duration of symptoms is constant. Type of injury: fall, laceration and direct blow. The location where the incident occurred was at school. Prior episodes: none.

Fell at home and hit her cheek on the ground. Patient had a laceration to the right cheek which her mother put Steri-Strips over. Concerned about adequacy of closure..

Review of Systems

Constitutional symptoms: Negative except as documented in HPI.
Skin symptoms: Negative except as documented in HPI.
ENMT symptoms: Negative except as documented in HPI.
Respiratory symptoms: Negative except as documented in HPI, No shortness of breath,
Cardiovascular symptoms: Negative except as documented in HPI, No chest pain,
Gastrointestinal symptoms: Negative except as documented in HPI, No abdominal pain,
Genitourinary symptoms: Negative except as documented in HPI.
Musculoskeletal symptoms: Negative except as documented in HPI.
Neurologic symptoms: Negative except as documented in HPI.
Psychiatric symptoms: Negative except as documented in HPI.
Additional review of systems information: All other systems reviewed and otherwise negative.

Health Status

Allergies:

Allergic Reactions (Selected)

No Known Allergies, Per nurse's notes.

Medications: Review/Insert Medication List (Selected)

, Per nurse's notes.

Immunizations: Per nurse's notes.

Past Medical/ Family/ Social History

Medical history

Reviewed as documented in chart.

Medical history: Include medical history

No active or resolved past medical history items have been selected or recorded., PMH/Problems ST
 No problems documented.

, Reviewed as documented in chart.

Surgical history:

No active procedure history items have been selected or recorded..

Family history:

No family history items have been selected or recorded., Reviewed as documented in chart.

Social history: Drug use: Denies.

Social history: Social History ST

Social & Psychosocial Habits

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: [REDACTED] 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Emergency Department**Tobacco**02/14/2017 **Smoking History:** Never smoker.**Problem list:** Per nurse's notes.**Physical Examination****Vital Signs**

Vital Signs (ST)

<u>Vital Signs (24 hrs)</u>	<u>Last Charted</u>		<u>Minimum</u>		<u>Maximum</u>	
Temp	36.6	(FEB 14 03:15)	36.6	(FEB 14 03:15)	36.6	(FEB 14 03:15)
Apical Heart Rate	85	(FEB 14 03:15)	85	(FEB 14 03:15)	85	(FEB 14 03:15)
SpO2	99	(FEB 14 03:15)	99	(FEB 14 03:15)	99	(FEB 14 03:15)
	Room air		Room air		Room air	

Measurements

02/14/17 03:17 PST	Height Method	Measured
	BSA Measured	0.5 m2
	Body Mass Index Measured	92.63 kg/m2
02/14/17 03:17 PST	Height	46 cm
	Weight	19.6 kg
	Daily Weight kg	19.6 kg
	Weight Method	Measured
	Weight Method	Measured

Basic Oxygen Information

02/14/17 03:15 PST	Oxygen Therapy	Room air
	SpO2	99 %

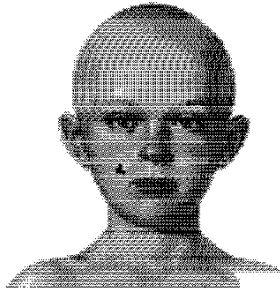
Physician interpretation of pulse oximetry: Normal.

General: Alert, no acute distress.**Skin:** steri strips removed. patient has an irregular wound of r cheek, shallow..**Eye:** Extraocular movements are intact.**Ears, nose, mouth and throat:** Oral mucosa moist.**Cardiovascular****Respiratory:** Respirations are non-labored.**Gastrointestinal:** Soft.**Musculoskeletal:** No deformity.**Neurological:** Alert and oriented to person, place, time, and situation, No focal neurological deficit observed.**Lymphatics****Psychiatric:** Cooperative, appropriate mood & affect.

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department



Medical Decision Making

Orders Review/Insert Order Profile (Selected)

Inpatient Orders

Ordered

ED Reassessment:

Vital Signs Mobile:

Canceled

ED Triage Mobile:

Completed

ED Nursing Exam: .

Procedure

Laceration repair

Confirmed: Time-out taken prior to procedure.

Consent: Patient, Has given verbal consent.

Description/ repair

Laceration 1 cm in length. Face: right, cheek.

Shape: irregular.

Depth: subcutaneous.

Details: clean.

Neurovascular/ tendon exam: intact.

Preparation: sterile field established, H2O2.

Irrigation: minimal, with saline.

Debridement: none.

Skin closure: Dermabond.

Complexity: single layer.

No Anesthesia.

Post procedure exam: Circulation, motor, sensory examination intact, Bleeding controlled.

Complications: None.

Patient tolerated: Well.

Performed by: Self.

Total time: 30 minutes.

Impression and Plan

Laceration of cheek, right - ICD10-CM S01.411A,

Print Date/Time 11/9/2018 09:21 PST

Medical Record

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SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: [REDACTED] 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Emergency Department

Plan

Condition: Stable.

Patient was given the following educational materials: LACERATION, Face (Dermabond).

Follow up with: Michael Nyarko, PED Within 5-7 days.

Counseled: Family.

Disposition: Launch Disposition Order

Admit/Transfer/Discharge:

Discharge Request (Order): 02/14/17 05:38 PST, Home Routine.

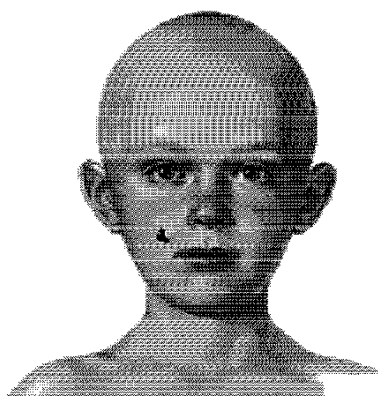
Electronically Signed By: Kim, John

On: 02.14.2017 05:38 PST

Patient Name: LAUDIG, JASMIN PERA
Date of Birth: [REDACTED] 2012

MRN: SHM4882575
FIN: SHM0000013825690

Attachment(s): 2/14/2017 05:33 PST



SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

2/14/2017 03:37 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:37 PST
Auth (Verified)
Lovera RN,Rachel D (2/14/2017 03:37 PST)
Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Triage RFV/Problems Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

Reason for Visit/Medical History ED

Reviewed Past Medical HX with Patient : Yes

Lovera RN, Rachel D - 2/14/2017 3:37 PST
(As Of: 2/14/2017 03:37:31 PST)

2/14/2017 03:37 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:37 PST
Auth (Verified)
Lovera RN,Rachel D (2/14/2017 03:37 PST)
Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Abuse/Neglect Peds Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

Abuse/Neglect Assessment

Threatened/Physically Hurt in past year : No
ED DV Harm or Neglect Question : No
Abuse and Neglect Types : None

Lovera RN, Rachel D - 2/14/2017 3:37 PST

2/14/2017 03:37 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:37 PST
Auth (Verified)
Lovera RN,Rachel D (2/14/2017 03:37 PST)
Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Triage General/Screening Peds Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

General/Screenings Peds

Suicidal Risk Assessment : No suicidal risk indicators identified
Document Fall Risk Screening : Pass
Immunizations Current : Yes
Clinical Trial Participant -- MU : None

Lovera RN, Rachel D - 2/14/2017 3:37 PST

2/14/2017 03:36 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:36 PST
Auth (Verified)
Lovera RN,Rachel D (2/14/2017 03:36 PST)
Lovera RN,Rachel D (2/14/2017 03:36 PST)

ED Languages Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:36 PST by Lovera RN, Rachel D

Languages

Preferred Languages : N/A due to age or patient condition
Parent/Guardian/Surrogate Preferred Languages : English

Lovera RN, Rachel D - 2/14/2017 3:36 PST

2/14/2017 03:36 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:36 PST
Auth (Verified)
Lovera RN,Rachel D (2/14/2017 03:36 PST)
Lovera RN,Rachel D (2/14/2017 03:36 PST)

ED Social History Entered On: 2/14/2017 3:36 PST
Performed On: 2/14/2017 3:36 PST by Lovera RN, Rachel D

Social History

Smoking History--MU : Never smoker
Tobacco Use Screening : Yes
Cultural Practices to be honored? : No
Is Blood Transfusion Acceptable to Patient : Yes

Lovera RN, Rachel D - 2/14/2017 3:36 PST

Social History

(As Of: 2/14/2017 03:36:57 PST)

Tobacco Use Screening

Tobacco Use Last 30 Days : No tobacco use of any form

Print Date/Time 11/9/2018 09:21 PST

Medical Record

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SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Emergency Department

Lovera RN, Rachel D - 2/14/2017 3:36 PST

2/14/2017 03:16 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:16 PST
Auth (Verified)
Rocco RN, Carrie (2/14/2017 03:16 PST)
Rocco RN, Carrie (2/14/2017 03:16 PST)

ED Triage Primary Pain Assessment Entered On: 2/14/2017 3:16 PST
Performed On: 2/14/2017 3:16 PST by Rocco RN, Carrie

Primary Pain

FACES Pain Scale Score : 6 = Hurts even more

Rocco RN, Carrie - 2/14/2017 3:16 PST

2/14/2017 03:15 PST
SERVICE DATE/TIME:
RESULT STATUS:
PERFORM INFORMATION:
SIGN INFORMATION:

Triage Note
2/14/2017 03:15 PST
Auth (Verified)
Rocco RN, Carrie (2/14/2017 03:15 PST)
Rocco RN, Carrie (2/14/2017 03:15 PST)

ED Triage Vitals Entered On: 2/14/2017 3:15 PST
Performed On: 2/14/2017 3:15 PST by Rocco RN, Carrie

ED Vitals

Peripheral Pulse Rate : 85 bpm
Apical Heart Rate : 85 bpm
O2 Therapy : Room air
SpO2 : 99 %
Temperature : 36.6 DegC
Temperature Convert C to F : 97.9 DegF
Temperature Method : Temporal Artery

Rocco RN, Carrie - 2/14/2017 3:15 PST

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Consents

DOCUMENT NAME: Clinical Consents
SERVICE DATE/TIME: 2/14/2017 00:00 PST
RESULT STATUS: Auth (Verified)
PERFORM INFORMATION:
SIGN INFORMATION:

Consents_20170214.pdf

Please click on link to see image.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD,John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Orders

Order: Vital Signs Mobile

Order Date/Time: 2/14/2017 03:11 PST

Signed Date/Time: 2/14/2017 03:11 PST

Order Status: Discontinued	Department Status: Discontinued	Catalog Type: Patient Care	Activity Type: Basic Care
----------------------------	---------------------------------	----------------------------	---------------------------

End-state Date/Time: 2/14/2017 08:01 PST

End-state Reason:

Ordering Physician: SYSTEM

Consulting Physician:

Entered By: SYSTEM on 2/14/2017 03:11 PST

Order Details: 2/14/17 3:11:22 AM PST, Routine

Order Comment: Ordered by Discern Expert.

Action Type: Discontinue	Action Date/Time: 2/14/2017 11:01 EST	Action Personnel: SYSTEM
--------------------------	---------------------------------------	--------------------------

Responsible Provider/Electronically Signed by: SYSTEM	Supervising Provider:	Communication Type:
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Order Details: 02/14/17 3:11:22 PST, Routine

Review Information:

Doctor Cosign: Not Required

Order Comment:

Action Type: Order	Action Date/Time: 2/14/2017 03:11 PST	Action Personnel: SYSTEM
--------------------	---------------------------------------	--------------------------

Responsible Provider/Electronically Signed by: SYSTEM	Supervising Provider:	Communication Type: Discern Expert
---	-----------------------	------------------------------------

Order Details: 02/14/17 3:11:22 PST, Routine

Review Information:

Doctor Cosign: Not Required

Order Comment: Ordered by Discern Expert.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD,John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Orders

Order: ED Triage Mobile

Order Date/Time: 2/14/2017 03:11 PST

Signed Date/Time: 2/14/2017 03:11 PST

Order Status: Canceled Department Status: Canceled Catalog Type: Patient Care Activity Type: Basic Care

End-state Date/Time: 2/14/2017 03:11 PST

End-state Reason: Duplicate Order

Ordering Physician: SYSTEM

Consulting Physician:

Entered By: SYSTEM on 2/14/2017 03:11 PST

Order Details: 2/14/17 3:11:22 AM PST, Routine, Constant order

Order Comment: Ordered by Discern Expert.

Action Type: Cancel

Action Date/Time: 2/14/2017 03:11 PST

Action Personnel: SYSTEM

Responsible Provider/Electronically

Supervising Provider:

Communication Type: Discern Expert

Signed by: SYSTEM

Order Details: 02/14/17 3:11:22 PST, Routine, Constant order

Review Information:

Doctor Cosign: Not Required

Order Comment:

Action Type: Order

Action Date/Time: 2/14/2017 03:11 PST

Action Personnel: SYSTEM

Responsible Provider/Electronically

Supervising Provider:

Communication Type: Discern Expert

Signed by: SYSTEM

Order Details: 02/14/17 3:11:22 PST, Routine, Constant order

Review Information:

Doctor Cosign: Not Required

Order Comment: Ordered by Discern Expert.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Orders

Order: ED Reassessment

Order Date/Time: 2/14/2017 03:17 PST

Signed Date/Time: 2/14/2017 03:17 PST

Order Status: Discontinued	Department Status: Discontinued	Catalog Type: Patient Care	Activity Type: Patient Care
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End-state Date/Time: 2/14/2017 08:01 PST

End-state Reason:

Ordering Physician: SYSTEM

Consulting Physician:

Entered By: SYSTEM on 2/14/2017 03:17 PST

Order Details: 2/14/17 3:17:03 AM PST, Routine

Order Comment: Order Placed by Discern Rule

Action Type: Discontinue	Action Date/Time: 2/14/2017 11:01 EST	Action Personnel: SYSTEM
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Responsible Provider/Electronically Signed by: SYSTEM	Supervising Provider:	Communication Type:
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Order Details: 02/14/17 3:17:03 PST, Routine

Review Information:

Doctor Cosign: Not Required

Order Comment:

Action Type: Order	Action Date/Time: 2/14/2017 03:17 PST	Action Personnel: SYSTEM
--------------------	---------------------------------------	--------------------------

Responsible Provider/Electronically Signed by: SYSTEM	Supervising Provider:	Communication Type: Discern Expert
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Order Details: 02/14/17 3:17:03 PST, Routine

Review Information:

Doctor Cosign: Not Required

Order Comment: Order Placed by Discern Rule

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD,John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Orders

Order: ED Nursing Exam

Order Date/Time: 2/14/2017 03:17 PST

Signed Date/Time: 2/14/2017 03:17 PST

Order Status: Completed	Department Status: Completed	Catalog Type: Patient Care	Activity Type: Patient Care
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End-state Date/Time: 2/14/2017 04:52 PST

End-state Reason:

Ordering Physician: SYSTEM

Consulting Physician:

Entered By: SYSTEM on 2/14/2017 03:17 PST

Order Details: 2/14/17 3:17:03 AM PST, NOW, Once, Stop date 2/14/17 4:52:16 AM PST

Order Comment: Order Placed by Discern Rule

Action Type: Complete	Action Date/Time: 2/14/2017 04:52 PST	Action Personnel: Lovera RN,Rachel D
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Responsible Provider/Electronically

Supervising Provider:

Communication Type:

Signed by: SYSTEM

Order Details: 02/14/17 3:17:03 PST, NOW, Once, Stop date 02/14/17 3:17:03 PST

Review Information:

Doctor Cosign: Not Required

Order Comment:

Action Type: Order	Action Date/Time: 2/14/2017 03:17 PST	Action Personnel: SYSTEM
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Responsible Provider/Electronically

Supervising Provider:

Communication Type: Discern Expert

Signed by: SYSTEM

Order Details: 02/14/17 3:17:03 PST, NOW, Once, Stop date 02/14/17 3:17:03 PST

Review Information:

Doctor Cosign: Not Required

Order Comment: Order Placed by Discern Rule

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD,John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Orders

Order: Discharge Request

Order Date/Time: 2/14/2017 05:38 PST

Signed Date/Time: 2/14/2017 05:38 PST

Order Status: Discontinued	Department Status: Discontinued	Catalog Type: Admit/Transfer/Observation	Activity Type: Admit/Transfer/Observation
----------------------------	---------------------------------	--	---

End-state Date/Time: 2/15/2017 06:02 PST

End-state Reason:

Ordering Physician: Kim,John J MD

Consulting Physician:

Entered By: Kim,John J MD on 2/14/2017 05:38 PST

Order Details: 2/14/17 5:38:00 AM PST, Home Routine

Order Comment:

Action Type: Discontinue	Action Date/Time: 2/15/2017 09:02 EST	Action Personnel: SYSTEM
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Responsible Provider/Electronically

Supervising Provider:

Communication Type:

Signed by: Kim,John J MD

Order Details: 02/14/17 5:38:00 PST, Home Routine

Review Information:

Doctor Cosign: Not Required

Order Comment:

Action Type: Order	Action Date/Time: 2/14/2017 05:38 PST	Action Personnel: Kim,John J MD
--------------------	---------------------------------------	---------------------------------

Responsible Provider/Electronically

Supervising Provider:

Communication Type: Written

Signed by: Kim,John J MD

Order Details: 02/14/17 5:38:00 PST, Home Routine

Review Information:

Nurse Review: Electronically Signed, Lovera RN,Rachel D on 2/14/2017 05:39 PST

Doctor Cosign: Not Required

Order Comment:

Order: Complete Document Medication by History

Order Date/Time: 2/17/2017 07:38 PST

Signed Date/Time: 2/17/2017 07:38 PST

Order Status: Ordered	Department Status: Ordered	Catalog Type: Patient Care	Activity Type: Patient Care
-----------------------	----------------------------	----------------------------	-----------------------------

End-state Date/Time: 2/17/2017 07:38 PST

End-state Reason:

Ordering Physician: SYSTEM

Consulting Physician:

Entered By: SYSTEM on 2/17/2017 07:38 PST

Order Details: 2/17/17 7:38:01 AM PST, Routine, Stop date 2/17/17 7:38:01 AM PST

Order Comment: Ordered by Discern Expert.

Action Type: Order	Action Date/Time: 2/17/2017 07:38 PST	Action Personnel: SYSTEM
--------------------	---------------------------------------	--------------------------

Responsible Provider/Electronically

Supervising Provider:

Communication Type: Discern Expert

Signed by: SYSTEM

Order Details: 02/17/17 7:38:01 PST, Routine, Stop date 02/17/17 7:38:01 PST

Review Information:

Doctor Cosign: Not Required

Order Comment: Ordered by Discern Expert.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: [REDACTED] 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Infusion Start/Stop

Infusion Billing Report

02/14/17 03:11 PST to 11/09/18 09:20 PST

LAUDIG, JASMIN PERA
Emergency

FIN 13825690
Location: SHM ED

MRN 4882575

No Results Qualified.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

Assessment Forms

DOCUMENT TYPE: ED Vital Signs and Pain - Text
SERVICE DATE/TIME: 2/14/2017 05:43 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Lovera RN,Rachel D (2/14/2017 05:43 PST)
SIGNED INFORMATION: Lovera RN,Rachel D (2/14/2017 05:43 PST)

ED Reassess / Vital Signs and Pain Adult Entered On: 2/14/2017 5:53 PST
Performed On: 2/14/2017 5:43 PST by Lovera RN, Rachel D

Primary Pain

FACES Pain Scale Score : 0 = No hurt

Lovera RN, Rachel D - 2/14/2017 5:43 PST

ED Nurse Reassessment

Nursing Note : Dermabond done by md and pt discharging home. Pt awake and alert

Lovera RN, Rachel D - 2/14/2017 5:43 PST

Discharge Care Plan

Mode of Discharge : Ambulates without assistance

Discharge Transportation : Police

Accompanied By : Father

Lovera RN, Rachel D - 2/14/2017 5:43 PST

DOCUMENT TYPE: QM SEP-1 Triage Screen-Text
SERVICE DATE/TIME: 2/14/2017 03:16 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Rocco RN,Carrie (2/14/2017 03:16 PST)
SIGNED INFORMATION: Rocco RN,Carrie (2/14/2017 03:16 PST)

QM SEP-1 Triage Screen v5.0 Entered On: 2/14/2017 3:16 PST
Performed On: 2/14/2017 3:16 PST by Rocco RN, Carrie

QM SEP-1 Triage Screen

Reg SEP Susp Infection UHS : No

Rocco RN, Carrie - 2/14/2017 3:16 PST

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

ED Nursing Documentation

DOCUMENT TYPE: Triage Note
SERVICE DATE/TIME: 2/14/2017 03:37 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)
SIGNED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Triage RFV/Problems Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

Reason for Visit/Medical History ED

Reviewed Past Medical HX with Patient : Yes

Lovera RN, Rachel D - 2/14/2017 3:37 PST
(As Of: 2/14/2017 03:37:31 PST)

DOCUMENT TYPE: Triage Note
SERVICE DATE/TIME: 2/14/2017 03:37 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)
SIGNED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Abuse/Neglect Peds Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

Abuse/Neglect Assessment

Threatened/Physically Hurt in past year : No
ED DV Harm or Neglect Question : No
Abuse and Neglect Types : None

Lovera RN, Rachel D - 2/14/2017 3:37 PST

DOCUMENT TYPE: Triage Note
SERVICE DATE/TIME: 2/14/2017 03:37 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)
SIGNED INFORMATION: Lovera RN,Rachel D (2/14/2017 03:37 PST)

ED Triage General/Screening Peds Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:37 PST by Lovera RN, Rachel D

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD,John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

ED Nursing Documentation

General/Screenings Peds

Suicidal Risk Assessment : No suicidal risk indicators identified
Document Fall Risk Screening : Pass
Immunizations Current : Yes
Clinical Trial Participant -- MU : None

Lovera RN, Rachel D - 2/14/2017 3:37 PST

DOCUMENT TYPE:	Triage Note
SERVICE DATE/TIME:	2/14/2017 03:36 PST
RESULT STATUS:	Auth (Verified)
PERFORMED INFORMATION:	Lovera RN,Rachel D (2/14/2017 03:36 PST)
SIGNED INFORMATION:	Lovera RN,Rachel D (2/14/2017 03:36 PST)

ED Languages Entered On: 2/14/2017 3:37 PST
Performed On: 2/14/2017 3:36 PST by Lovera RN, Rachel D

Languages

Preferred Languages : N/A due to age or patient condition
Parent/Guardian/Surrogate Preferred Languages : English

Lovera RN, Rachel D - 2/14/2017 3:36 PST

DOCUMENT TYPE:	Triage Note
SERVICE DATE/TIME:	2/14/2017 03:36 PST
RESULT STATUS:	Auth (Verified)
PERFORMED INFORMATION:	Lovera RN,Rachel D (2/14/2017 03:36 PST)
SIGNED INFORMATION:	Lovera RN,Rachel D (2/14/2017 03:36 PST)

ED Social History Entered On: 2/14/2017 3:36 PST
Performed On: 2/14/2017 3:36 PST by Lovera RN, Rachel D

Social History

Smoking History--MU : Never smoker
Tobacco Use Screening : Yes
Cultural Practices to be honored? : No
Is Blood Transfusion Acceptable to Patient : Yes

Lovera RN, Rachel D - 2/14/2017 3:36 PST

Social History

(As Of: 2/14/2017 03:36:57 PST)

Tobacco Use Screening

Tobacco Use Last 30 Days : No tobacco use of any form

Print Date/Time 11/9/2018 09:21 PST

Medical Record

Page 46 of 57

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
MRN: SHM4882575
DOB/Sex: 2012 / Female
Attending: Kim MD, John J

Admit: 2/14/2017
Disch: 2/14/2017
FIN: SHM0000013825690

ED Nursing Documentation

Lovera RN, Rachel D - 2/14/2017 3:36 PST

DOCUMENT TYPE: Triage Note
SERVICE DATE/TIME: 2/14/2017 03:16 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Rocco RN, Carrie (2/14/2017 03:16 PST)
SIGNED INFORMATION: Rocco RN, Carrie (2/14/2017 03:16 PST)

ED Triage Primary Pain Assessment Entered On: 2/14/2017 3:16 PST
Performed On: 2/14/2017 3:16 PST by Rocco RN, Carrie

Primary Pain

FACES Pain Scale Score : 6 = Hurts even more

Rocco RN, Carrie - 2/14/2017 3:16 PST

DOCUMENT TYPE: Triage Note
SERVICE DATE/TIME: 2/14/2017 03:15 PST
RESULT STATUS: Auth (Verified)
PERFORMED INFORMATION: Rocco RN, Carrie (2/14/2017 03:15 PST)
SIGNED INFORMATION: Rocco RN, Carrie (2/14/2017 03:15 PST)

ED Triage Vitals Entered On: 2/14/2017 3:15 PST
Performed On: 2/14/2017 3:15 PST by Rocco RN, Carrie

ED Vitals

Peripheral Pulse Rate : 85 bpm
Apical Heart Rate : 85 bpm
O2 Therapy : Room air
SpO2 : 99 %
Temperature : 36.6 DegC
Temperature Convert C to F : 97.9 DegF
Temperature Method : Temporal Artery

Rocco RN, Carrie - 2/14/2017 3:15 PST

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Diagnoses**Diagnosis: Laceration of cheek, right (Qualifier:)****Secondary Description:****Last Reviewed Date:** 2/14/2017 05:38 PST; Kim, John J MD**Responsible Provider:** Kim, John J MD**Diagnosis Date:** 2/14/2017**Status:** Active**Classification:** Medical; **Clinical Service:** Non-Specified; **Confirmation:** Confirmed; **Code:** S01.411A (ICD-10-CM);**Ranking:** ; **Severity:** ; **Severity Class:** ; **Certainty:** ; **Probability:** 0; **Type:** Discharge; **Priority:**

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: [REDACTED] 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Triage

Recorded Date	2/14/2017	2/14/2017
Recorded Time	03:17 PST	03:17 PST
Recorded By	Rocco RN, Carrie	Rocco RN, Carrie
Procedure		
Chief Complaint	-	See Below ^{T1}
Tracking Acuity	4 - Less Urgent	-

Textual Results

T1: 2/14/2017 03:17 PST (Chief Complaint)

Fell at 1700 at preschool. Hit right cheek on the ground. Cleaned and steri strips applied.

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Measurements

Recorded Date		2/14/2017	2/14/2017
Recorded Time		03:17 PST	03:17 PST
Recorded By		Rocco RN, Carrie	Rocco RN, Carrie
Procedure			
Height	-	-	46
Height Method	Measured	-	-
Weight	-	-	19.6
Daily Weight kg	-	-	19.6
Weight Method	-	Measured	Measured
BSA	0.5	-	-
Body Mass Index Measured	92.63	-	-

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Vital Signs

Recorded Date	2/14/2017
Recorded Time	03:15 PST
Recorded By	Rocco RN, Carrie
Procedure	
Temperature (Route Not Specified)	36.6
Temperature Convert C to F	97.9
Temperature Method	Temporal Artery
Apical Heart Rate	85
Peripheral Pulse Rate	85
SpO2	99
Oxygen Therapy	Room air

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Pain Assessment

Recorded Date	2/14/2017	2/14/2017
Recorded Time	05:43 PST	03:16 PST
Recorded By	Lovera RN, Rachel D	Rocco RN, Carrie
Procedure		
FACES Pain Scale Score	0 = No hurt	6 = Hurts even more

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Assessments and Treatments

	Recorded Date	2/14/2017	2/14/2017	2/14/2017	2/14/2017	2/14/2017
	Recorded Time	05:16 PST	05:16 PST	04:49 PST	04:48 PST	04:48 PST
	Recorded By	SYSTEM	SYSTEM	SYSTEM	SYSTEM	SYSTEM
Procedure						
Visitor Status	Yes	Yes	Yes	Yes	Yes	Yes

	Recorded Date	2/14/2017	2/14/2017	2/14/2017
	Recorded Time	04:00 PST	04:00 PST	03:45 PST
	Recorded By	SYSTEM	SYSTEM	Lovera RN, Rachel D
Procedure				
Visitor Status	Yes	Yes	-	
HEENT Basic Assessment	-	-	See Below ^{T1}	
Cardiovascular Basic Assessment	-	-	See Below ^{T2}	
Respiratory Basic Assessment	-	-	No cough, Respirations unlabored	
Gastrointestinal Basic Assessment	-	-	No nausea, No vomiting	
Genitourinary Basic Assessment	-	-	N/A	
Musculoskeletal Basic Assessment	-	-	See Below ^{T3}	
Integumentary Symptoms	-	-	Skin abnormality	
Neuro Basic Assessment	-	-	See Below ^{T4}	
Other: right cheek Right				
Skin Abnormality Type	-	-	Lacerations	

Textual Results

- T1: 2/14/2017 03:45 PST (HEENT Basic Assessment)
 No eye, nose, or ear deformity, No eye, nose, or ear drainage, Tongue pink, intact
- T2: 2/14/2017 03:45 PST (Cardiovascular Basic Assessment)
 Nail beds pink, No edema, Tolerates activity
- T3: 2/14/2017 03:45 PST (Musculoskeletal Basic Assessment)
 Ambulates without difficulty, Normal range of motion, No contractures, deformities, No swelling
- T4: 2/14/2017 03:45 PST (Neuro Basic Assessment)
 Affect calm, cooperative, and appropriate, Alert, Moves all extremities equally

	Recorded Date	2/14/2017	2/14/2017	2/14/2017
	Recorded Time	03:37 PST	03:36 PST	03:15 PST
	Recorded By	Lovera RN, Rachel D	Lovera RN, Rachel D	Rocco RN, Carrie
Procedure				
Oxygen Therapy	-	-	Room air	
SpO2	-	-	99	
Suicidal Risk Assessment	See Below ^{T5}	-	-	
Threatened/Physically Hurt in Past Year	No	-	-	
Cultural Practices to be honored?	-	No	-	

Textual Results

- T5: 2/14/2017 03:37 PST (Suicidal Risk Assessment)
 No suicidal risk indicators identified

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA
 MRN: SHM4882575
 DOB/Sex: 2012 / Female
 Attending: Kim MD, John J

Admit: 2/14/2017
 Disch: 2/14/2017
 FIN: SHM0000013825690

Assessments and Treatments

	Recorded Date	2/14/2017	2/14/2017	2/14/2017	2/14/2017
	Recorded Time	03:11 PST	03:11 PST	03:11 PST	03:11 PST
	Recorded By	SYSTEM	SYSTEM	SYSTEM	SYSTEM
Procedure					
Visitor Status		Yes	Yes	Yes	Yes

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Infection Control

Recorded Date	2/14/2017
Recorded Time	03:35 PST
Recorded By	Lovera RN, Rachel D
Procedure	
Symptoms of TB	No symptoms of TB
History of TB	See Below ^{T1}
TB Risk Score	0
Travel Out of Country	No
C.diff Screening	No
MRSA Screen Hx MRSA	No
Able to obtain information	Able to obtain

Textual Results

T1: 2/14/2017 03:35 PST (History of TB)
No known history of exposure to TB

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Patient and Family Education

Recorded Date	2/14/2017
Recorded Time	05:53 PST
Recorded By	Lovera RN, Rachel D
Procedure	
Barriers to Learning	None evident
Ed-Disease Process	Verbalizes understanding
Ed-Follow-Up Care/Appointment	Verbalizes understanding
Ed-Hand Washing	Verbalizes understanding
Home Caregiver Present for Session	Yes
Ed-Hygiene	Verbalizes understanding
Ed-Potential Complications	Verbalizes understanding
Ed-Recognition of Symptoms	Verbalizes understanding
Responsible Learner/s Present	See Below ^{T1}
Ed-Signs of Infection	Verbalizes understanding
Ed-Symptom Control	Verbalizes understanding
Teaching Method	Explanation, Printed materials
Ed-When to Call Health Care Provider	Verbalizes understanding

Textual Results

T1: 2/14/2017 05:53 PST (Responsible Learner/s Present)

No Data Available

SHM- Summerlin Hospital Medical Center

Patient: LAUDIG, JASMIN PERA

Admit: 2/14/2017

MRN: SHM4882575

Disch: 2/14/2017

DOB/Sex: 2012 / Female

FIN: SHM0000013825690

Attending: Kim MD, John J

Quality Measure Info

Recorded Date		2/14/2017	2/14/2017
Recorded Time		03:36 PST	03:16 PST
Recorded By		Lovera RN, Rachel D	Rocco RN, Carrie
Procedure			
Tobacco Use Screening		Yes	-
Tobacco Use Last 30 Days		No tobacco use of any form	-
Reg SEP Susp Infection UHS		-	No



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Exhibit 7

HANKINS AND SOHN PLASTIC SURGERY ASSOCITES

60 N. Pecos Road

HENDERSON, NV 89074

PHONE- 702-897-1330

FAX- 702-897-9499

IME

DATE: 11/15/2018

PATIENT: Jasmin Laudig

To: Jordan Schnitzer, Esquire

Dear Mr. Schnitzer,

Today I evaluated Jasmin Laudig for injuries which occurred on 02/13/2017, when she fell against a sharp metal object. I discussed the immediate wound care with her mother, who is a nurse, and my understanding is as follows: Mom initially cleaned the wound and applied a butterfly type dressing. Then Jasmin was taken to the ER where the physician utilized Dermabond to "close" the wound. Unfortunately, the fact that the wound wasn't closed in layers despite the fact that the wound was quite deep (from photos Mom took of the injury the day it occurred), has resulted in a wound with a significant "puckering" that occurs when Jasmin smiles. This is very noticeable with almost any degree of animation of the mouth.

The scar itself has healed quite well, but the animation deformity requires surgical revision to release the scar from the underlying tissues and reclose the wound in layers. Due to Jasmin's age, this would need to be performed under general anesthesia, and the costs for this surgery, including surgery center, anesthesia, surgeon's fees and all follow-up care would be 13, 800.00. Within a reasonable degree of medical certainty, the deformity which exists on Jasmin's cheek is related to the injury which occurred on 02/13/2017.

Sincerely,



W. Tracy Hankins, MD

Certified by the American Board of Plastic Surgery



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Exhibit 8

ALVERSON TAYLOR & SANDERS
LAWYERS
6605 GRAND MONTECITO PKWY STE 200
LAS VEGAS, NV 89149
(702) 384-7000

EWDI
J. BRUCE ALVERSON, ESQ.
Nevada Bar No. 1339
KARIE N. WILSON, ESQ.
Nevada Bar No. 7957
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy, Ste. 200
Las Vegas, NV 89149
702-384-7000 Phone
702-385-7000 Fax
Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMIN LAUDIG, a minor, by and through
her father, JOHN LAUDIG, an individual;

CASE NO: A-20-808230-C
DEPT. NO: 21

Plaintiffs,

v.

**DEFENDANT LANDS, INC. dba
SPRINGSTONE LAKES
MONTESSORI SCHOOL'S INITIAL
EXPERT WITNESS DISCLOSURE**

LANDS, INC. dba SPRINGSTONE LAKES
MONTESSORI SCHOOL, a domestic corporation;
SPRINGLANDS LLC, a domestic limited liability
corporation; DOES 1 through 10; and ROE
CORPORATIONS 1 through 20, inclusive

Defendants.

**DEFENDANT LANDS, INC. dba SPRINGSTONE LAKES MONTESSORI SCHOOL'S
INITIAL EXPERT WITNESS DISCLOSURE**

COMES NOW Defendant LANDS, INC. dba SPRINGSTONE LAKES MONTESSORI
SCHOOL, by and through its counsel of record, the law firm of ALVERSON TAYLOR &
SANDERS, and hereby submits the following Expert Witness Disclosures pursuant to NRC
16.1(a)(2):

...

WITNESSES

1. Daniel S. Grant, R.A., NCARB, CXLT
Rimkus Consulting Group, Inc.
6001 S. Decatur Blvd., Suite P
Las Vegas, NV 89118

Mr. Grant is by education, experience, and training an expert in the areas of construction design, defect, and safety. Mr. Grant has experience in determining the standard of care, industry standards, and applicable codes in his assessment of premise liability disputes. Mr. Grant is expected to testify regarding Plaintiff's allegations of defect and/or maintenance related to the fencing surrounding the playground at Springstone Lakes Montessori School. Additionally, Mr. Grant is expected to evaluate the standard of care owed by Springstone Lakes Montessori School, the maintenance of the gate and/or fence, and the subject incident.

Mr. Grant may add to, delete from, modify, or change his expected testimony, depending upon the nature of further information obtained between now and the time of trial, and the deposition and trial testimony of other witnesses in this case. Mr. Grant is familiar with the facts of this case, has agreed to testify at trial, and will be prepared to give a meaningful deposition, although his opinions will not be finalized until he becomes fully aware of Plaintiff's contentions and the opinions of all experts, which have not been fully ascertained at this time. Copies of Mr. Grant's expert report, *curriculum vitae*, testimony list, and fee schedule are attached hereto as **Exhibit A.**

Defendant reserves the right to supplement this list as discovery continues.

Defendant reserves the right to notice any expert depositions and/or call experts at trial as designated by any party to the litigation whether that party remains a party at the time of trial.

...

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1 Defendant reserves the right to introduce competent former testimony from the above
2 stated expert witnesses or any other expert witness in the event any such witness is unavailable
3 for trial as permitted by applicable Nevada Revised Statutes and/or Civil Procedure.

4 Dated this 20th day of July 2021.

5 ALVERSON TAYLOR & SANDERS

6 

7 J. BRUCE ALVERSON, ESQ.

8 Nevada Bar No. 1339

9 KARIE N. WILSON, ESQ.

10 Nevada Bar No. 7957

11 6605 Grand Montecito Pkwy, Ste. 200

12 Las Vegas, NV 89149

13 702-384-7000 Phone

14 702-385-7000 Fax

15 Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of July 2021, the forgoing
DEFENDANT LANDS, INC. dba SPRINGSTONE LAKES MONTESSORI SCHOOL'S
INITIAL EXPERT WITNESS DISCLOSURE was served on the following by Electronic
Service to All parties on the Odyssey Service List.

Jordan P. Schnitzer, Esq.
jordan@theschnitzerlawfirm.com
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, NV 89148
702-960-4050 Phone
702-960-4092 Fax
Attorney for Plaintiffs



Employee of ALVERSON TAYLOR & SANDERS

ALVERSON TAYLOR & SANDERS
LAWYERS
6605 GRAND MONTECITO PKWY STE 200
LAS VEGAS, NV 89149
(702) 384-7000

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EXHIBIT C

REGISTER OF ACTIONS
CASE NO. A-20-808230-C

Jasmin Laudig, Plaintiff(s) vs. Lands Inc., Defendant(s)

S
e
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r
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tCase Type: Negligence - Premises Liability
Date Filed: 01/09/2020
Location: Department 21
Cross-Reference Case Number: A808230

PARTY INFORMATION

Defendant	Lands Inc. <i>Doing Business As</i> Springstone Lakes Montessori School	Lead Attorneys J. Bruce Alverson <i>Retained</i> 702-384-7000(W)
Defendant	Springlands LLC	J. Bruce Alverson <i>Retained</i> 702-384-7000(W)
Plaintiff	Laudig, Jasmin	Jordan Schnitzer <i>Retained</i> 702-960-4050(W)

EVENTS & ORDERS OF THE COURT

DISPOSITIONS	
05/16/2022	Partial Summary Judgment (Judicial Officer: Clark Newberry, Tara) Debtors: Lands Inc. (Defendant), Springlands LLC (Defendant) Creditors: Jasmin Laudig (Plaintiff) Judgment: 05/16/2022, Docketed: 05/17/2022 Total Judgment: 15,854.00
OTHER EVENTS AND HEARINGS	
01/09/2020	Initial Appearance Fee Disclosure Doc ID# 1 [1] Plaintiff's Initial Appearance Fee Disclosure
01/09/2020	Complaint Doc ID# 2 [2] Complaint
01/09/2020	Summons Electronically Issued - Service Pending Doc ID# 3 [3] Plaintiff's Summons to LANDS, INC.
01/09/2020	Summons Electronically Issued - Service Pending Doc ID# 4 [4] Plaintiff's Summons to SPRINGLANDS LLC
04/27/2020	Affidavit of Service Doc ID# 5 [5] Affidavit of Service Lands Inc.
04/27/2020	Affidavit of Service Doc ID# 6 [6] Affidavit of Service Springlands LLC
05/05/2020	Initial Appearance Fee Disclosure Doc ID# 7 [7] Initial Appearance Fee Disclosure (NRS Chapter 19)
05/05/2020	Answer to Complaint Doc ID# 8 [8] Defendants' Answer to Plaintiff's Complaint
05/05/2020	Demand for Jury Trial Doc ID# 9 [9] Defendants' Demand for Jury Trial
05/26/2020	Request for Exemption From Arbitration Doc ID# 10 [10] Request for Exemption from Arbitration
05/28/2020	Stipulation and Order to Amend Doc ID# 11 [11] Stipulation and Order to Amend Caption
05/29/2020	Notice of Entry of Stipulation and Order Doc ID# 12 [12] Notice of Entry of Stipulation and Order to Amend Caption
06/02/2020	Opposition to Request for Exemption Doc ID# 13 [13] Defendant Lands Inc. dba Springstone Lakes Montessori School and Springlands LLC's Objection to Plaintiff's Request for Exemption from Arbitration
06/09/2020	Commissioners Decision on Request for Exemption - Granted Doc ID# 14 [14] Commissioner's Decision on Request for Exemption - GRANTED
07/22/2020	Joint Case Conference Report Doc ID# 15 [15] Joint Case Conference Report
08/07/2020	Notice of Taking Deposition Doc ID# 16 [16] Notice of Taking Videotaped Deposition of Yasemin Laudig
08/20/2020	Scheduling and Trial Order Doc ID# 17 [17] Scheduling Order and Order Setting Civil Jury Trial and Calendar Call
09/12/2020	Filing Fee Remittance Doc ID# 18 [18] Filing Fee Remittance
09/21/2020	Stipulation and Order Doc ID# 19 [19] Stipulation and Order Allowing Defendants to Issue Subpoenas to Plaintiff's Medical Providers
09/24/2020	Notice of Entry of Stipulation and Order Doc ID# 20 [20] Notice of Entry of Stipulation and Order
10/01/2020	Notice of Taking Deposition Doc ID# 21 [21] Notice of Taking Deposition of the Custodian of Records for Summerlin Hospital Medical Center
10/22/2020	Amended Notice of Taking Deposition Doc ID# 22 [22] First Amended Notice of Taking Deposition of Yasemin Laudig
11/13/2020	Amended Notice of Taking Deposition Doc ID# 23 [23] Second Amended Notice of Taking the Videotaped Deposition of Yasemin Laudig
11/23/2020	Amended Notice of Taking Deposition Doc ID# 24 [24] Third Amended Notice of Taking The Videotaped Deposition of Yasemin Laudig
12/03/2020	Amended Notice of Taking Deposition Doc ID# 25 [25] Fourth Amended Notice of Taking the Videotaped Deposition of Yasemin Laudig
12/15/2020	Notice of Intent Doc ID# 26 [26] Seven Day Notice of Intent to Serve a Subpoena for Deposition Pursuant to NRCP 45(e)(4)(a)
12/23/2020	Notice of Taking Deposition Doc ID# 27 [27] Notice of Taking Videotaped Deposition of Shimrit Yonasy
12/23/2020	Amended Notice of Taking Deposition Doc ID# 28 [28] First Amended Notice of Taking Deposition of Shimrit Yonasy (Updated Zoom Information)
01/04/2021	Case Reassigned to Department 21 Judicial Reassignment to Judge Tara Clark Newberry
01/14/2021	Amended Notice of Taking Deposition Doc ID# 29 [29] Second Amended Notice of Taking Deposition of Shimrit Yonasy (Updated Time)
04/02/2021	Motion Doc ID# 30 [30] Defendants Motion to Compel the Deposition of Plaintiff Jasmin Laudig
04/06/2021	Clerk's Notice of Hearing Doc ID# 31 [31] Notice of Hearing
04/16/2021	Opposition to Motion Doc ID# 32 [32] Plaintiff's Partial Opposition to Defendants' Motion to Compel Deposition of Plaintiff, Jasmin Laudig
04/22/2021	Stipulation and Order to Extend Discovery Deadlines Doc ID# 33 [33] STIPULATION AND (PROPOSED) ORDER EXTENDING DISCOVERY DEADLINES BY SIXTY DAYS (First Request)
04/23/2021	Notice of Entry of Stipulation and Order Doc ID# 34 [34] Notice of Entry of Stipulation and Order
05/04/2021	Reply in Support Doc ID# 35 [35] Defendants' Reply in Support of Motion to Compel the Deposition of Plaintiff Jasmin Laudig
05/11/2021	Motion to Compel (9:00 AM) (Judicial Officer Truman, Erin) Defendants Motion to Compel the Deposition of Plaintiff Jasmin Laudig <u>Parties Present</u> <u>Minutes</u> Result: Granted
05/25/2021	Discovery Commissioners Report and Recommendations Doc ID# 36 [36] Discovery Commissioner's Report and Recommendations -Originals
06/11/2021	Order Doc ID# 37 [37] Order RE. Discovery Commissioner's Report and Recommendations
06/17/2021	CANCELED Status Check: Compliance (3:00 AM) (Judicial Officer Truman, Erin) Vacated Status Check: Compliance / 5-11-2021 DCRR
07/08/2021	Notice of Taking Deposition Doc ID# 38 [38] Notice of Taking the Deposition of Plaintiff Jasmin Laudig
08/24/2021	Disclosure Statement Doc ID# 39 [39] Defendant Lands, Inc. dba Springstone Lakes Montessori School's NRCP 7.1 Disclosure Statement
09/24/2021	Affidavit of Service Doc ID# 40 [40] Affidavit of Service
10/01/2021	Stipulation and Order to Extend Discovery Deadlines Doc ID# 41 [41] Stipulation and Order Extending Discovery Deadlines (Second Request)
10/04/2021	Affidavit of Service Doc ID# 42 [42] Affidavit of Service
10/05/2021	Affidavit of Service Doc ID# 43 [43] Affidavit of Service
02/23/2022	Motion for Partial Summary Judgment Doc ID# 44 [44] Plaintiff's Motion For Partial Summary Judgment
02/23/2022	Exhibits Doc ID# 45 [45] Exhibits to Plaintiff's Motion for Partial Summary Judgment
02/24/2022	Clerk's Notice of Hearing Doc ID# 46 [46] Notice of Hearing
03/04/2022	Motion in Limine Doc ID# 47 [47] Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 2 to Exclude or Limit the Opinions and Testimony of Randell P. Phlips
03/04/2022	Motion in Limine Doc ID# 48 [48] Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 1 to Exclude Certain Irrelevant Documents
03/04/2022	Motion for Partial Summary Judgment Doc ID# 49 [49] Defendant's Motion for Partial Summary Judgment
03/04/2022	Clerk's Notice of Hearing Doc ID# 50 [50] Notice of Hearing
03/04/2022	Motion in Limine Doc ID# 51 [51] Plaintiff's Motion in Limine No. 1: Preclude Admission/Reference of Attorney Liens
03/04/2022	Motion in Limine Doc ID# 52 [52] Plaintiff's Motion in Limine No. 2: Exclude Evidence of Any Granted or Waiver Past Medical Specials and Medical Bills
03/04/2022	Motion to Strike Doc ID# 53 [53] Motion to Strike Defendant's Expert for Failure to Obey Subpoena Duces Tecum
03/07/2022	Clerk's Notice of Hearing Doc ID# 54

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03/09/2022	[54] Notice of Hearing	
	Opposition to Motion For Summary Judgment Doc ID# 55	
03/09/2022	[55] Defendant's Opposition to Plaintiff's Motion for Partial Summary Judgment	
	Clerk's Notice of Nonconforming Document Doc ID# 56	
03/09/2022	[56] Clerk's Notice of Nonconforming Document	
	Clerk's Notice of Nonconforming Document Doc ID# 57	
03/15/2022	[57] Clerk's Notice of Nonconforming Document	
	Opposition to Motion Doc ID# 58	
03/17/2022	[58] Defendant Lands, Inc. dba Springstone Lakes Montessori School Opposition to Plaintiff's Motion to Strike Defendant's Expert for Failure to Obey Subpoena Duces Tecum	
	Opposition to Motion in Limine Doc ID# 59	
03/17/2022	[59] Defendant Lands, Inc. dba Springstone Lakes Montessori School Opposition to Plaintiff's Motion in Limine No. 1	
	Opposition to Motion in Limine Doc ID# 60	
03/18/2022	[60] Defendant Lands, Inc. dba Springstone Lakes Montessori School Opposition to Plaintiff's Motion in Limine No. 2	
	Pre-Trial Disclosure Doc ID# 61	
03/18/2022	[61] Defendant Lands, Inc. dba Springstone Lakes Montessori School's Pre-Trial Disclosures	
	Mandatory Pretrial Disclosure Doc ID# 62	
03/18/2022	[62] Plaintiff's NRCP 16.1 (a)(3) Pre-Trial Disclosure	
	Opposition to Motion For Summary Judgment Doc ID# 63	
03/18/2022	[63] Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment	
	Opposition to Motion in Limine Doc ID# 64	
03/18/2022	[64] Plaintiff's Opposition to Defendant's Motion for Limine No. 1 to Exclude Certain Irrelevant Documents	
	Opposition to Motion in Limine Doc ID# 65	
03/21/2022	[65] Plaintiff's Opposition to Defendant's Motion for Limine No. 2 to Exclude or Limit the Opinions and Testimony of Randle P. Phelps	
	Clerk's Notice of Nonconforming Document and Curative Action Doc ID# 66	
03/21/2022	[66] Clerk's Notice of Nonconforming Document and Curative Action	
	Clerk's Notice of Nonconforming Document and Curative Action Doc ID# 67	
03/21/2022	[67] Clerk's Notice of Curative Action	
	Clerk's Notice of Hearing Doc ID# 68	
03/23/2022	[68] Notice of Hearing	
	Notice of Rescheduling of Hearing Doc ID# 69	
03/23/2022	[69] Notice of Rescheduling of Hearing	
	Notice of Rescheduling of Hearing Doc ID# 70	
03/29/2022	[70] Notice of Rescheduling of Hearing	
	Calendar Call (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Parties Present	
	Minutes	
	03/30/2022 Reset by Court to 03/29/2022	
	03/31/2022 Reset by Court to 03/31/2022	
	03/31/2022 Reset by Court to 03/30/2022	
	Result: Motion Granted	
04/08/2022	Reply in Support Doc ID# 71	
	[71] Defendant's Reply in Support of Motion for Partial Summary Judgment	
04/08/2022	Joinder to Motion For Partial Summary Judgment Doc ID# 72	
	[72] Defendant Springlands LLC's Joinder to Defendant's Motion for Partial Summary Judgment and to Defendant's Reply in Support of Motion for Partial Summary Judgment	
04/12/2022	Joinder to Motion in Limine Doc ID# 73	
	[73] Defendant Springlands LLC's Joinder to Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 2 to Exclude or Limit the Opinions and Testimony of Randle P. Phelps	
04/12/2022	Joinder to Motion in Limine Doc ID# 74	
	[74] Defendant Springlands LLC's Joinder to Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 1 to Exclude Certain Irrelevant Documents	
04/14/2022	Notice of Change of Hearing Doc ID# 75	
	[75] Notice of Change of Hearing - Motion's in Limine	
04/14/2022	Notice of Change of Hearing Doc ID# 76	
	[76] Notice of Change of Hearing - Motion's for Partial Summary Judgment and Joinder	
04/15/2022	Order Shortening Time Doc ID# 77	
	[77] Joint Motion to Continue Trial on Order Shortening Time	
04/15/2022	Motion to Continue Trial (3:00 AM) (Judicial Officer Clark Newberry, Tara)	
	Joint Motion to Continue Trial on Order Shortening Time	
	Minutes	
	04/27/2022 Reset by Court to 04/15/2022	
	Result: Granted	
04/18/2022	Amended Order Setting Jury Trial Doc ID# 78	
	[78] Amended Order Setting Trial	
04/20/2022	Reply in Support Doc ID# 79	
	[79] Defendants' Reply in Support of Motion in Limine No. 1 to Exclude Certain Irrelevant Documents	
04/20/2022	Reply to Opposition Doc ID# 80	
	[80] Plaintiff's Reply to Opposition Motion in Limine No. 1: Preclude Admission of Attorney Liens	
04/20/2022	Reply to Opposition Doc ID# 81	
	[81] Plaintiff's Reply to Opposition Motion in Limine No. 2: Exclude Evidence of Granted or Waived Past Medical' Specials and Bills	
04/20/2022	Reply to Opposition Doc ID# 82	
	[82] Plaintiff's Reply to Opposition to Motion to Strike Defendant's Expert	
04/20/2022	Reply to Opposition Doc ID# 83	
	[83] Plaintiff's Reply to Opposition to Motion for Partial Summary Judgment	
04/27/2022	Motion for Partial Summary Judgment (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Plaintiff's Motion For Partial Summary Judgment	
	03/30/2022 Reset by Court to 04/27/2022	
	Result: Granted	
04/27/2022	Motion for Partial Summary Judgment (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant's Motion for Partial Summary Judgment	
	04/20/2022 Reset by Court to 04/27/2022	
	Result: Denied	
04/27/2022	Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Plaintiff's Motion in Limine No. 1: Preclude Admission/Reference of Attorney Liens	
	Result: Granted	
04/27/2022	Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Plaintiff's Motion in Limine No. 2: Exclude Evidence of Any Granted or Waiver Past Medical Specials and Medical Bills	
	Result: Granted	
04/27/2022	Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Motion to Strike Defendant's Expert for Failure to Obey Subpoena Duces Tecum	
	Result: Deferred Ruling	
04/27/2022	Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 1 to Exclude Certain Irrelevant Documents	
	Result: Denied Without Prejudice	
04/27/2022	Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 2 to Exclude or Limit the Opinions and Testimony of Randle P. Phelps	
	Result: Denied	
04/27/2022	Joinder (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant Springlands LLC's Joinder to Defendant's Motion for Partial Summary Judgment and to Defendant's Reply in Support of Motion for Partial Summary Judgment	
	Result: Denied	
04/27/2022	Joinder to Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant Springlands LLC's Joinder to Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 2 to Exclude or Limit the Opinions and Testimony of Randle P. Phelps	
	Result: Denied	
04/27/2022	Joinder to Motion in Limine (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Defendant Springlands LLC's Joinder to Defendant Lands, Inc. dba Springstone Lakes Montessori School's Motion in Limine No. 1 to Exclude Certain Irrelevant Documents	
	Result: Denied Without Prejudice	
04/27/2022	CANCELED Motion to Continue Trial (3:00 AM) (Judicial Officer Clark Newberry, Tara)	
	Vacated	
	Joint Motion to Continue Trial on Order Shortening Time	
04/27/2022	All Pending Motions (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Parties Present	
	Minutes	
	Result: Matter Heard	
04/28/2022	Order Granting Motion Doc ID# 84	
	[84] ORDER GRANTING JOINT MOTION TO CONTINUE TRIAL ON ORDER SHORTENING TIME	
05/16/2022	CANCELED Jury Trial (9:00 AM) (Judicial Officer Clark Newberry, Tara)	
	Vacated	
	04/18/2022 Reset by Court to 04/18/2022	
	04/18/2022 Reset by Court to 04/18/2022	
	04/18/2022 Reset by Court to 04/18/2022	
	04/18/2022 Reset by Court to 05/16/2022	
05/16/2022	Order Doc ID# 85	
	[85] Order Regarding Motions in Limine	
05/16/2022	Order Doc ID# 86	
	[86] Order Regarding Plaintiff's Motion to Strike Defendant's Expert for Failure to Obey Subpoena Duces Tecum	
05/16/2022	Order Doc ID# 87	
	[87] Order Regarding Plaintiff's Motion for Partial Summary Judgment	
05/16/2022	Order Doc ID# 88	
	[88] Order Regarding Defendants' Motion for Summary Judgment	
05/17/2022	Notice of Entry of Order Doc ID# 89	
	[89] NOE Motion in Limine	
05/17/2022	Notice of Entry of Order Doc ID# 90	
	[90] NOE Plaintiff's MSJ	
05/17/2022	Notice of Entry of Order Doc ID# 91	
	[91] NOE Defendant's MSJ	
05/17/2022	Notice of Entry of Order Doc ID# 92	
	[92] NOE Motion to Strike Expert	
05/25/2022	Pre Trial Conference (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
05/25/2022	CANCELED Pre Trial Conference (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
	Vacated - Duplicate Entry	
06/08/2022	Calendar Call (9:30 AM) (Judicial Officer Clark Newberry, Tara)	
06/27/2022	Jury Trial (9:00 AM) (Judicial Officer Clark Newberry, Tara)	

FINANCIAL INFORMATION

Defendant Lands Inc,
Total Financial Assessment
Total Payments and Credits
Balance Due as of 05/23/2022

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423.00
423.00
0.00

05/05/2020	Transaction Assessment				223.00
05/05/2020	Efile Payment	Receipt # 2020-23812-CCCLK	LANDS, INC.		(223.00)
03/04/2022	Transaction Assessment				200.00
03/04/2022	Efile Payment	Receipt # 2022-13200-CCCLK	Lands Inc.		(200.00)
	Defendant Springlands LLC				
	Total Financial Assessment				230.00
	Total Payments and Credits				230.00
	Balance Due as of 05/23/2022				0.00
09/21/2020	Transaction Assessment				30.00
09/21/2020	Efile Payment	Receipt # 2020-52534-CCCLK	Springlands LLC		(30.00)
04/08/2022	Transaction Assessment				200.00
04/08/2022	Efile Payment	Receipt # 2022-21170-CCCLK	Springlands LLC		(200.00)
	Plaintiff Laudig, Jasmin				
	Total Financial Assessment				470.00
	Total Payments and Credits				470.00
	Balance Due as of 05/23/2022				0.00
01/09/2020	Transaction Assessment				270.00
01/09/2020	Efile Payment	Receipt # 2020-01604-CCCLK	Laudig, Yasemin		(270.00)
02/23/2022	Transaction Assessment				200.00
02/23/2022	Efile Payment	Receipt # 2022-10939-CCCLK	Laudig, Jasmin		(200.00)