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Attorneys for Defendants
8 *Summerlin Hospital and Medical Center,*
Jan Sayoc, RN, and Bozidar Knezevic, RN

**DISTRICT COURT
CLARK COUNTY, NEVADA**

11 ELISA SALES, Individually and
12 EDGAR SALES, Individually

13 Plaintiffs,

14 vs.

15 SUMMERLIN HOSPITAL AND MEDICAL
CENTER, LLC, a Foreign LLC duly
16 authorized to conduct business in the State of
Nevada; JAN SAYOC, RN, individually;
17 BOZIDAR KNEZEVIC, RN, individually;
DAEJOON ANH, M.D., individually, and
18 d/b/a DAEJOON ANH, M.D., P.C.;
HEALTH CARE PARTNERS; BARNEY
19 JOSEPH NEMIROFF, M.D., individually,
and d/b/a BARNEY NEMIROFF, M.D.,
20 PLLC; NEVADA ANESTHESIOLOGY
PARTNERS, LLT; DOES I through X,
21 inclusive; and ROE CORPORATIONS, I
through X, inclusive;

22 Defendants.

CASE NO.: A-17-758060-C
DEPT NO.: XXIX

JOINT PRETRIAL MEMORANDUM

Date of Trial: September 30, 2019
Estimated Trial Length: 4 weeks

23
24 Plaintiffs Elisa and Edgar Sales, by and through their counsel, Carol F. Hay, Esq., Sean K.
25 Claggett, Esq., and Jennifer Morales, Esq., and Defendants Summerlin Hospital and Medical
26 Center, Jan Sayoc, RN, and Bozidar Knezevic, RN, by and through their counsel, Michael Prangle,
27
28

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1 Esq., and Marjorie Kratsas, Esq., and hereby submit the following Pretrial Memorandum pursuant
2 to EDCR 2.67. The parties met and conferred on August 21, 2019, as required by EDCR 2.67.

3
4 **I.**

5 **BRIEF STATEMENT OF FACTS**

6 This is a Corporate Negligence and Professional Negligence action concerning the
7 treatment provided to Plaintiff Elisa Sales during her cath lab procedure at Summerlin Hospital.
8 Ms. Sales was admitted on July 8, 2016, to undergo an automatic implanted cardiac defibrillator
9 replacement (“AICD”). This is essentially a battery change for the existing defibrillator, aka a
10 pacemaker. Her co-morbidities at that time included diabetes, high blood pressure and congestive
11 heart failure. The first incision was made at 12:21 pm. The Summerlin Hospital Cath Lab team
12 members included Dr. Daejoon Anh, the cardiologist, Dr. Barney Nemiroff, the anesthesiologist,
13 two Summerlin Registered Nurses, Jan Sayoc and Bozidar Knezevic, Summerlin Scrub tech
14 Dimitrios Antonopoulos, and the Summerlin Hospital Monitor tech, Jess Hanna.

15
16 The patient’s vital signs were normal up to testing (the new battery is tested by purposefully
17 placing the patient into an abnormal rhythm to ensure the pacemaker is functioning), which
18 occurred between approximately 12:44 and 12:45 pm. The next vital signs, at 12:45:28, revealed
19 a drop-in blood pressure from 141/89 to 67/48. This is not necessarily unusual given the provision
20 of propofol and nature of the testing, nonetheless the staff switched the vital sign recording from
21 every five minutes to approximately every minute and notified Dr. Nemiroff.

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24 Shortly thereafter, Dr. Nemiroff administered fluids, followed by ephedrine, in an attempt
25 to correct the blood pressure. This intervention was ineffective, and blood pressure dropped
26 further, to 57/44 with respiration at 10, by 12:46:40. Approximately one minute later, at 12:47:44,
27 blood pressure remained depressed at 58/46 with respiration at 0. A second dose of ephedrine was
28

1 given one minute later, which also was ineffective. Six minutes of low blood pressure occur.
2 Cardiac arrest occurred between 12:49:48 and 12:50:58. The Parties dispute the timing of CPR.
3 Eventually blood pressure returned to normal around 12:59:56 and a pulse was found at 1:01:36.
4

5 **II.**
6 **CLAIMS OF RELIEF**

7 Plaintiffs' Amended Complaint alleges a failure to properly monitor the patient and timely
8 address the blood pressure concerns and cardiac arrest, resulting in related complications and long-
9 term neurological deficits.
10

11 Plaintiffs' Amended Complaint alleges negligence against Summerlin Hospital, Jan Sayoc,
12 RN, Bozidar Knezevic, RN, Daejoon Anh, MD, Healthcare Partners, Barney Joseph Nemiroff,
13 MD, and Nevada Anesthesiology Partners, LLP. Dr. Anh has recently settled out of the case and
14 a stipulated dismissal has been executed on behalf of Nevada Anesthesiology Partners, LLP.
15 Nevada Anesthesia Partners have been dismissed from the case via a stipulated dismissal and Dr.
16 Nemiroff has also settled from the case.
17

18 The remaining allegations include corporate and/or professional negligence, vicarious
19 liability, negligent hiring and/or supervision, and/or negligent credentialing/privileging against
20 Summerlin Hospital. Professional negligence only against Bozidar Knezevic, RN, and Jan Sayoc,
21 RN, Plaintiffs allege that Dr. Nemiroff is an ostensible agent of Summerlin Hospital. Similarly,
22 Plaintiffs allege corporate negligence, vicarious liability, and negligent hiring and supervision of
23 Barney Joseph Nemiroff, MD. Lastly, Plaintiffs allege loss of consortium against all remaining
24 Defendants.
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27 **III.**
28 **AFFIRMATIVE DEFENSES**

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Defendants Summerlin Hospital and Medical Center, Jan Sayoc, RN, and Bozidar Knezevic, RN's Affirmative Defenses:

1. Defendants assert that Plaintiffs' injuries, if any, were caused by the acts or inactions of persons beyond the control or right of control of Defendants and for whom these answering Defendants are not liable or responsible.

2. Defendants assert that Plaintiffs' Complaint fails to state a compensable claim for which relief can be granted against Defendants.

3. Defendants assert that Summerlin Hospital Medical Center has fully performed and discharged all medical and legal obligations owed to Plaintiffs, including meeting the requisite standard of care to which Plaintiffs were entitled.

4. Defendants assert that some or all of the claims contained in the Complaint are barred because Plaintiffs, although under a duty to do so, failed to mitigate the alleged damages.

5. Defendants assert that Plaintiffs' Complaint should be dismissed to the extent that it contains allegations barred by the expiration of the statute of limitations.

6. Defendants avail themselves of all affirmative defenses as set forth in NRS 41A, and NRS 42.

7. Defendants assert that the Plaintiffs' Complaint should be dismissed with respect to the answering Defendants on the basis that treatment that Defendant Summerlin Hospital Medical Center rendered was not the proximate cause of any alleged injury sustained by Plaintiffs.

8. Defendants assert that Plaintiff ELISA SALES' own actions caused and/or contributed to the damages alleged in the Complaint.

9. Defendants allege that Plaintiffs' claims are barred from any recovery against Defendants, in that any and all damages, injury, or harm that Plaintiffs complain of was proximately caused by

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acts or omissions of persons or entities, other than Defendants, which acts or omissions were intervening, superseding causes of Plaintiffs' alleged damages.

10. Defendants allege that Plaintiffs have not suffered any injury or damage as a result of any action or inaction by Defendant Summerlin Hospital Medical Center, to the extent that any occurred, and Plaintiffs are therefore barred from asserting any cause of action against Defendants.

11. Defendants allege that Plaintiffs, by their own acts, omissions, and other conduct are barred from any recovery herein against Defendants by the doctrine of consent.

12. Defendants allege that any damages or losses sustained by Plaintiffs were caused by risks that Plaintiffs were well aware of, understood, and voluntarily assumed.

13. Defendants allege that Plaintiffs' Complaint, and each and every cause of action contained therein, fails because the claims alleged and damages sought are speculative.

14. Defendants allege that Plaintiffs, by their own conduct, acts, and omissions voluntarily, knowingly, and intentionally waived, released, and relinquished any right to assert any of the purported causes of action against Defendants, or to seek or make any recovery herein against Defendants.

15. Defendants allege that Plaintiffs, by their own acts and omissions are barred from any recovery herein against Defendants by virtue of the doctrine of estoppel.

16. Defendants allege that they are entitled to indemnity/contribution from Plaintiffs and/or other parties or non-parties to this action.

17. Defendants allege that Plaintiffs' damages, if any, were caused solely by conditions or illnesses suffered by Plaintiffs prior to any association with Defendants, and that said illnesses or conditions were not the result of any negligence or malpractice, nor are they alleged to be the result of any negligence or malpractice by Defendants.

1 18. Plaintiffs are barred from asserting any claims against answering Defendants because the
2 alleged damages were the result of the intervening and/or superseding conduct of others.

3 19. Pursuant to NRS 41A.045, in the event Defendants are found liable, Defendants shall be
4 severally liable for Plaintiffs' economic and non-economic damages only for that portion of the
5 judgment which represents the percentage of negligence attributable to these answering
6 Defendants.

7
8 20. Defendants avail themselves of all affirmative defenses as set forth in NRS 41A.021,
9 41A.031, 41A.035, 41A.045, 41A.071, 41A.100, 42.020, 41.1395 and all applicable subparts.

10 21. Defendants deny each and every allegation of Plaintiffs' Complaint not specifically
11 admitted or otherwise plead to herein.

12
13 22. Defendants incorporate by reference those affirmative defenses enumerated in Rule 8 of
14 the Nevada Rules of Civil Procedure as if fully set forth herein. In the event further investigation
15 or discovery reveals the applicability of any such defenses, Defendants reserve the right to seek
16 leave of the court to amend this Answer to specifically assert any such defense. Such defenses are
17 herein incorporated by reference for the specific purpose of not waiving any such defense.

18
19 23. Defendants currently have insufficient information upon which to form a belief as to
20 whether there may be additional, yet unstated, affirmative defenses available. Defendants
21 specifically reserve the right to assert additional affirmative defenses in the event discovery
22 indicates such defenses apply.

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24 **IV.**

25 **CLAIMS OR DEFENSES TO BE ABANDONED**

26 The parties have not abandoned any claims or defenses at this time.

27 **V.**

28 **LIST OF EXHIBITS**

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A. Joint Exhibits

The Parties have stipulated to the authenticity but not admissibility of the following documents:

1.	Cath Lab Record (Previously SUM000239 – SUM000258) 0001-0030
2.	Continuous procedure EKG (Previously CATH EKG000001 - CATH EKG000703) 0001-0703
3.	Amended Continuous Procedure EKG (Previously A CATH EKG000001 - A CATH EKG000703) 0001-0703
4.	Nemiroff Anesthesia Pre Op Report (Previously SUM000186 – SUM000187) 0001-0002
5.	Amended Complaint or Second Amended Complaint 0001-0196
6.	Answer to Amended Complaint or Answer to Second Amended Complaint 0001-0013
7.	Defendant Summerlin’s Responses to 1 st Set of Requests of Admissions 0001-0003
8.	Defendant Summerlin’s Responses to 1 st Set of Interrogatories 0001-0008
9.	Defendant Summerlin’s Responses to 1 st Set of Requests for Production 0001-0021
10.	Defendant Summerlin’s Responses to 2 nd Set of Requests for Production 0001-0010
11.	Summerlin Hospital Operator Log (Previously OL000001) 0001
12.	American Heart Association Guidelines for CPR and ECC (Previously AHAG000001 - AHAG000036) 0001-0036
13.	Summerlin Hospital Policy Titled: Alarm Safety (Previously P&P000001 - P&P000005) 0001-0005
14.	Summerlin Hospital Policy Titled: Code Cart Maintenance (Previously P&P000006 - P&P 000007) 0001-0002
15.	Valley Health System Policy Titled: Heartcode BLS (Previously P&P000008 - P&P000009) 0001-0002
16.	Mock Code Blue Competency Evaluations-Adult (Previously MCBCEA000001 - MCBCEA000005)

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	0001-0004
17.	Summerlin Hospital Medical Center Medical Staff Bylaws (Previously SH_BYLAWS000001 - SH_BYLAWS000059) 0001-0059
18.	Summerlin Hospital Medical Center Rules & Regulations (Previously SH_RR000001 - SH_RR000048) 0001-0048
19.	Summerlin Hospital Medical Center Credentials Manual (Previously SH_CMS000001 - SH_CM000024) 0001-0024
20.	Summerlin Hospital Policy Titled: Code Blue Resuscitation (Previously P&P000010 - P&P000013) 0001-0004
21.	LifePak 20 Defibrillator/Monitor Operating Instructions (Previously LPDM_OI000001 - LPDM_OI000182) 0001-0182
22.	Mac-Lab Quick Reference Guide, Version 6.0 (Previously MQRG000001 - MWRG000016) 0001-0016
23.	MacLab/CardioLab/INW Installation Vol. 2 of 2 Instructions (Previously MCI000557 - MCI000972) 0001-0416
24.	Medtronic LifePak 12 Service Manual (Previously MLSM000001 - MLSM000849) 0001-0849
25.	Radical-7 Operator's Manual 0001-0152
26.	Cath Lab Meeting Minutes (Previously CLMM000001 - CLMM000014) 0001-0014
27.	List of Equipment with Audible Alarms (Previously EAA000001) 0001
28.	Summerlin Hospital Medical Center Crash Cart Checklist (Previously SH_CCC000001) 0001
29.	Jan Sayoc Employee Files (Previously SAYOC000001 - SAYOC000407) 0001-0407
30.	Bozidar Knezevic Employee Files (Previously KNEZEVIC000001 - KNEZEVIC000254) 0001-0254
31.	Jesse Hanna Employee Files (Previously HANNA000001 - HANNA000111) 0001-0111

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32.	Patient Safety Event Report (Previously PSER0001 - PSER00002) 0001-0002
33.	Job Descriptions (Previously JD000001 - 000014) 0001-0014
34.	Summerlin Hospital Policy Titled: Oxygen Saturation by Pulse Oximetry (Previously P&P000015) 0001
35.	Summerlin Hospital Policy Titled: Alarm Safety (Previously P&P000016 - P&P000020) 0001-0005
36.	Summerlin Hospital Policy Titled: Sedation - Moderate (Conscious) and Deep (Previously P&P000021 - P&P000026) 0001-0006
37.	Summerlin Hospital Policy Titled: Universal Protocol (Previously P&P000027 - P&P000031) 0001-0005
38.	Summerlin Hospital Policy Titled: Impella Circulatory Support (Previously P&P000032 - P&P000034) 0001-0003
39.	Summerlin Hospital Policy Titled: Code Blue Resuscitation (Adult Pediatric) (Previously P&P000035 - P&P000037) 0001-0003
40.	Summerlin Hospital Policy Titled: Code Blue Resuscitation (Previously P&P000038 - P&P000039) 0001-0002
41.	Summerlin Hospital Policy Titled: PICC Line Guidelines and Care - Using Ultrasound Guided Technique and ECG Tip Placement Confirmation (Previously P&P0000040 - P&P000042) 0001-0003
42.	Summerlin Hospital Policy Titled: Blood Gas Ordering-Reporting (Previously P&P000043 - P&P000045) 0001-0003
43.	Summerlin Hospital Policy Titled: Turnaround Time (Previously P&P000061 - P&P000062) 0001-0002
44.	Summerlin Hospital Policy Titled: Cardiac Cath Lab Scope of Services (Previously P&P000070 - P&P000071) 0001-0002
45.	Summerlin Hospital Policy Titled: Contrast Studies and Film Availability (Previously P&P000072) 0001
46.	Summerlin Hospital Policy Titled: Documentation of Cardiac Catheterization Patients (Previously P&P000073) 0001

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47.	Summerlin Hospital Policy Titled: Doppler Pulse Checks (Previously P&P000074) 0001
48.	Summerlin Hospital Policy Titled: Impella Circulatory Support (Previously P&P000075 - P&P000077) 0001-0003
49.	Summerlin Hospital Policy Titled: Implantable Devices (Previously P&P000078) 0001
50.	Summerlin Hospital Policy Titled: Outpatient Cardiac Catheterization Discharge Instructions (Previously P&P000079) 0001
51.	Summerlin Hospital Policy Titled: Post-Cardiac Catheterization Care (Previously P&P000082) 0001
52.	Summerlin Hospital Policy Titled: Preparation for Catheterization Procedure (Previously P&P000083) 0001
53.	Summerlin Hospital Policy Titled: Program Supervision Medical Direction (Previously P&P000084) 0001
54.	Summerlin Hospital Policy Titled: Stress Test Procedure (Previously P&P000085 - P&P000093) 0001-0009
55.	Summerlin Hospital Policy Titled: Thrombolytic Therapy (Previously P&P000094) 0001
56.	Summerlin Hospital Policy Titled: Administration of Contrast Material (Previously P&P000095 - P&P000097) 0001-0003
57.	Summerlin Hospital Policy Titled: Admission Discharge Criterial Critical Care Units (Previously P&P000098 - P&P000101) 0001-0004
58.	Summerlin Hospital Policy Titled: Anesthesia Guidelines (Previously P&P000102 - P&P000103) 0001-0002
59.	Summerlin Hospital Policy Titled: Anticoagulation Safety and Monitoring Protocols (Previously P&P000104 - P&P000107) 0001-0004
60.	Summerlin Hospital Policy Titled: Assessment Reassessment of Patients (Previously P&P000108 - P&P000109) 0001-0002
61.	Summerlin Hospital Policy Titled: Care Planning (Previously P&P000110) 0001

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62.	Summerlin Hospital Policy Titled: Circulating RN Duties (Previously P&P000111- P&P000112) 0001-0002
63.	Summerlin Hospital Policy Titled: Code Card Maintenance (Previously P&P000113 - P&P000114) 0001-0002
64.	Summerlin Hospital Policy Titled: Contrast Administration in Radiology (Previously P&P000115 - P&P000116) 0001-0002
65.	Summerlin Hospital Policy Titled: Critical Care Patient Assessment (Previously P&P000117) 0001
66.	Summerlin Hospital Policy Titled: Critical Test Resulting Reporting C (Previously P&P000118 - P&P000126) 0001-0009
67.	Summerlin Hospital Policy Titled: Endotracheal Intubation Guidelines for Assisting (Previously P&P000127 - P&P000129) 0001-0003
68.	Summerlin Hospital Policy Titled: Endotracheal Intubation Adult Maintenance Care (Previously P&P000130 - P&P000132) 0001-0003
69.	Summerlin Hospital Policy Titled: Femoral Sheath Removal (Previously P&P000133 - P&P000138) 0001-0006
70.	Summerlin Hospital Policy Titled: History and Physical Requirements for Invasive Procedure Patients (Previously P&P000139 - P&P000140) 0001-0002
71.	Summerlin Hospital Policy Titled: Informed Consent (Previously P&P000141 - P&P000149) 0001-0009
72.	Summerlin Hospital Policy Titled: Intravenous Therapy (Previously P&P000150 - P&P000152) 0001-0003
73.	Summerlin Hospital Policy Titled: Post Anesthesia Care (Previously P&P000153 - P&P000158) 0001-0006
74.	Summerlin Hospital Policy Titled: Pain Management (Previously P&P000159 - P&P000160) 0001-0002
75.	Summerlin Hospital Policy Titled: Sterile Field Medications (Previously P&P000161) 0001
76.	Summerlin Hospital Policy Titled: Maintaining a Sterile Field (Previously P&P000162 - P&P000166) 000100-0005

1	77.	Summerlin Hospital Policy Titled: Order for Blood Gas (Previously P&P000167) 0001
2	78.	Summerlin Hospital Policy Titled: Patient Care in Radiology (Previously P&P000168 - P&P000169) 0001-0002
3	79.	Summerlin Hospital Policy Titled: Annual Mandatory Education and Employment Requirements (Previously P&P000170) 0001
4	80.	Adult Guidelines for IV Infusion Medications (Previously P&P000171 - P&P000180) 0001-0010
5	81.	Photographs of Cath Lab (Previously PHOTO0000001) 0001
6	81b.	Photographs of Cath Lab (Previously PHOTO0000002) 0002
7	81c.	Photographs of Cath Lab (Previously PHOTO0000003) 0002
8	81d.	Photographs of Cath Lab (Previously PHOTO0000004) 0003
9	82.	Dr. Barney Nemiroff Credentialing File (Previously NEMIROFF000001 - NEMIROFF000194) 0001-00194
10	83.	Dr. Daejoon Anh Credentialing File (Previously ANH000001 - ANH000198) 0001-00199

B. Plaintiffs' Proposed Exhibits

Plaintiffs submit the following list of exhibits noted below. Plaintiffs reserve the right to supplement this list prior to trial. Plaintiffs do not represent that they will use any of said exhibits at trial, only that they may. In addition, Plaintiffs reserve the right to use any document identified in the exhibit list of any party. Exhibits included on the list may become admissible if a proper foundation is laid for admissibility at trial. The presence of a document on this exhibit list does not constitute an admission that a document is admissible.

<u>NO.</u>	<u>Exhibit</u>
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1.	Summary of Past Medical Bills 0001
2.	Summary of Future Medical Specials 0001
3-1 to 3-69	Photographs of Elisa and Edgar Sales with family and friends 3-0001 to 3-0069
4.	Billing Records from MountainView (Previously MntViewBills-001-MntViewBills-007) 0001-0007
5.	Summerlin Hospital Billing (Previously SH_BILLS000001 - SH_BILLS000033) 0001-0033
6.	Account Notes (Previously ACCOUNT000001 - ACCOUNT000003) 0001-0003
7.	Detailed itemized (Previously ITEMIZED000001 - ITEMIZED000014) 0001-0014
8.	Mac-Lab/CardioLab/INW Installation (Previously MCI000001 - MCI000556) 0001-0556
9.	Dr. Barney Nemiroff's July 2015 to July 2017 ACLS and BLS Certification Cards (Previously) 0001
10.	Dr. Daejoon Anh's Basic Life Support Certification from January 2016 to January 2018 (Previously HCP 02892) 0001
11.	Dr. Daejoon Anh's Advanced Cardiac Life Support Certification from January 2016 to January 2018 (Previously HCP 02893) 0001
12.	Dr. Barney Nemiroff's Billing records 0001-0003
13.	Dr. Daejoon Anh's Medical records (Previously Anh-001 - Anh-041) 0001-0041
14.	Dr. David Navratil's Medical records (Previously Navratil-001 - Navratil-013) 0001-0013
15.	Canyon Vista Billing (Previously CanyonVistaBills0001-CanyonVistaBills002) 0001-0002
16.	Statistics regarding medical errors from Johns Hopkins Medicine and the National Center for Biotechnology Information

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17.	About the Hospital - Summerlin Hospital Medical Center 0001-0005
18.	Medicare Hospital Compare, Summerlin Hospital Profile 0001-0004
19.	Medicare Hospital Compare Overall Hospital Rating 0001-0007
20.	National Vital Statistics Reports, United States Life Tables, 2016, Volume 68, Number 4, dated May 7, 2019 0001-0066
21.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Carol V. Anderson, Ph.D. 0001-0029
22.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Jonathan Burroughs, M.D. 0001-0100
23.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Terrence M. (Mike) Clauretje, Ph.D., CPA 0001-0089
24.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of William J. Mazzei, M.D. 0001-0024
25.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Rolynn Navarro, R.N 0001-0017
26.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Peter Ott, M.D 0001-0039
27.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Tarvez Tucker, M.D 0001-0036
28.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Susan C. Wright, R.N 0001-0065
29.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Edwin Amos, M.D., as well as his test results and Mini Mental State Examination 0001-0040
30.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Alicia Burr, MSN, APRN 0001-0015
31.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Aubrey A. Corwin, MS 0001-0089
32.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Rahul N. Doshi, M.D

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33.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History, of David L. Ginsburg, M.D. 0001-0022
34.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Jeffrey S. Goodman, M.D. 0001-0020
35.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of John Charles Hyde, II, Ph.D. 0001-0023
36.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Thomas F. Kinsora, Ph.D. 0001-0086
37.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Byron K. Lee, M.D. 0001-0029
38.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Samuel M. Lundstrom, Ph.D. 0001-0037
39.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Ronald G. Pearl, M.D 0001-0038
40.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Charles A. Pietrafesa, M.D., MBA 0001-0054
41.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of Robert J. Reynolds, Ph.D. 0001-0043
42.	Initial, Rebuttal and Supplemental Report(s), C.V., Fee Schedule, Testimony History of David M. Rothenberg, M.D 0001-0037
43.	Continuous Procedure EKG Strips (Bates No. A CATH EKG 000286 to A CATH EKG 000425) with notations by Defendant Daejoon Anh, M.D., from his deposition taken on Thursday, March 29, 2018 0001-0140
44-1 To 44-6	Cath Lab Photos as marked by Dimitrios Antonopoulos during his deposition on April 9, 2019 0001-0006
45.	Heart Rhythm Society Expert Consensus Statement on Electrophysiology Laboratory Standards: Process, Protocols, Equipment, Personnel, and Safety referred to in Alicia Burr, R.N.'s report(s) and attached as an Exhibit to her deposition 0001-0044
46.	Various documents containing handwritten notes and notations by Dr. Peter Ott obtained from Dr. Ott during his April 19, 2019 deposition (Previously HCP02882 - HCP02891)

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	0001-0010
47.	Demonstrative prepared by Peter Ott, M.D., and Focus Graphics, available for inspection upon request 0001
48.	Tali Arik, M.D.s, C.V. (Previously) 0001-0014
49.	Recording of Neurologist Dr. Amos (Previously Produced in Defendant Summerlin Hospital's ECC as IME Recording - 012719) (Previously 012719) 0001
50.	American Code of Professional Conduct (Previously SALES000001-SALES000007) 0001-0007
51.	Detailed Review of Cranial Nerves (Previously SALES000008-SALES000042) 0001-0035
52.	Standards for Educational and Psychological Testing (Previously SALES000043-SALES000045) 0001-0003
53.	Mini Mental State (Previously SALES000046-SALES000055) 0001-0010
54.	How to Assess the Cranial Nerves (Previously SALES000056-SALES000059) 0001-0004
55.	Amos Expert (Previously SALES000060-SALES000061) 0001-0002
56.	Amos Verdict Search (Previously SALES000062-SALES000146) 0001-0085
57.	Billips v. Los Angeles County (Previously SALES000147-SALES000154) 0001-0008
58.	Costa v. Kroes (Previously SALES000155-SALES000164) 0001-0010
59.	Diaz v. Los Angeles County (Previously SALES000165-SALES000181) 0001-0017
60.	Davis v. Dixon (Previously SALES000182-SALES000183) 0001-0002
61.	McCullough v. Nike

1	(Previously SALES000184-SALES000192) 0001-0009
2	62. Tierno v. Fountain Valley (Previously SALES000193-SALES000208) 0001-0016
3	
4	63. Melendez v. Los Angeles County (Previously SALES000209-SALES000211) 0001-0003
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6	64. Phillips v. Century LLC (Previously SALES000212-SALES000222) 0001-0011
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8	65. Leanos v. City of Garden (Previously SALES000223-SALES000224) 0001-0002
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10	66. Rose v. MPTF (Previously SALES000225) 0001
11	
12	67. Schneider v. Blessey (Previously SALES000226) 0001
13	
14	68. John Bedotto, M.D. Billing (Previously BedottoBills01-BedottoBills02) 0001-0002
15	
16	69. Farooq Shaikh MD Billing 0001-0002
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18	70. Healthcare Partners Billing 0001-0004

a. All discovery responses to Interrogatories, Requests for Production of Documents and Requests for Admissions from all Defendants which were propounded by the Plaintiff;

b. All exhibits attached to Plaintiff's Motions in Limine and Plaintiff's Replies filed in support thereof;

c. All exhibits attached to Plaintiff's Oppositions to Defendants' Motions in Limine filed; and,

d. All exhibits attached to any and all depositions taken in this matter.

Any and all documents provided by the Defendant and/or any other party to this litigation

PLAINTIFFS' DEMONSTRATIVE EXHIBITS

Plaintiffs May Offer, at Trial, Certain Exhibits for Demonstrative Purposes

Including, But Not Limited, the Following:

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1. Powerpoint images, drawings, diagrams, timelines, storyboards, computer digitized/rendered images and animations regarding Plaintiffs' case theory and injuries;
2. Photographs of Plaintiff, Elisa Sales, other parties, witnesses, and/or incident scene;
3. Medical Timelines;

Plaintiffs reserve the right to use any demonstrative exhibits disclosed by Defendants in this matter. Plaintiffs reserve the right to introduce such other demonstrative exhibits into evidence as may be necessary for purposes of rebuttal, impeachment, or both.

C. Defendants expects to offer the following evidence at trial:

Defendants Summerlin Hospital and Medical Center, Jan Sayoc, RN, and Bozidar Knezevic, RN:

Exhibit No.	Exhibit Description
200.	Summerlin Hospital medical records (SUM000001 – SUM001885) D000001-D001885
201.	Dr. Divina Averilla medical records (DA000001 – DA000208) D001886-D002073
202.	Dr. John Bedotto medical records (JB000001 – JB000031) D002074-D002104
203.	HealthCare Partners medical (HCP000001 – HCP000085) D002105-D002189
204.	Mountainview Hospital medical records (MVH000001 – MVH000425) D002190-D002614
205.	Spring Valley Hospital medical (SVH000001 – SVH000544) D002615- D003158
206.	Shaheen Chowdhry, M.D. medical records (SC000001-SC000008) D003159- D003166
207.	University Medical Center medical records (UMC000001-000181) D003167- D003347
208.	Patient Safety Work Product Privilege Log D003348
209.	Maria C. Adolfo, M.D. medical records (MAD000001-MAD000057) D003349- D003405
210.	Canyon Vista Post-Acute medical records (CVPA000001-CVPA000081) D003406- D003486
211.	Mini-Mental State Examination

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Exhibit No.	Exhibit Description
	(MMSE000001-000002) D003487- D003488
212.	Dr. Barney Nemiroff's July 2015 to July 2017 ACLS and BLS Certification Cards D003489
213.	Dr. Daejoon Anh's Basic Life Support Certification from January 2016 to January 2018 (HCP 02892) D003490
214.	Dr. Daejoon Anh's Advanced Cardiac Life Support Certification from January 2016 to January 2018 (HCP 02893) D003491
215.	Continuous Procedure EKG Strips w/notations by Daejoon Anh, M.D., from deposition taken on March 29, 2019 (A CATH EKG 000286 to A CATH EKG 000425) D003492- D003631
216.	Cath Lab Photos as marked by Dimitrios Antonopoulos during his deposition on April 9, 2019 D003632- D003637
217.	Mini Mental State (SALES000046-SALES000055) D003638- D003647
218.	Surveillance video D003648
219.	Cath Lab Inspection Video(s) D003649
220.	Plaintiffs' Responses to Summerlin Hospital's First Set of Request for Production of Documents, including the following exhibits: Copy of Elisa Sales' Insurance Cards; CMS letter re: Elisa Sales, response and print out from CMS portal; Copy of Edgar Sales' Insurance Card; CMS letter re: Edgar Sales, response and print out, from CMS portal D003650- D003678
221.	Plaintiffs' Supplemental Responses to Summerlin Hospital's First Set of Request for Production of Documents D003679- D003688
222.	Plaintiff Elisa Sales' Responses to Healthcare Partner's First Set of Request for Production of Documents, including the following exhibit: CMS letter, response and print out, from portal D003689- D003704
223.	Plaintiff Elisa Sales' Responses to Healthcare Partner's Second Set of Request for Production of Documents D003705- D003708
224.	Plaintiff Edgar Sales' Responses to Summerlin Hospital's Second Set of Request for Production of Documents D003709- D003712
225.	Plaintiff, Elisa Sales' Answers to Summerlin Hospital's First Set of Interrogatories D003713- D003739
226.	Plaintiff, Elisa Sales' Supplemental Answers to Summerlin Hospital's First Set of Interrogatories D003740- D003773
227.	Plaintiff, Elisa Sales' Answers to Healthcare Partner's First Set of Interrogatories D003774- D003784

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Exhibit No.	Exhibit Description
228.	Plaintiff, Elisa Sales' Supplemental Answers to Healthcare Partner's First Set of Interrogatories D003785- D003796
229.	Plaintiff, Elisa Sales' Answers to Healthcare Partner's Second Set of Interrogatories D003797- D003803
230.	Plaintiff, Elisa Sales' Answers to Healthcare Partner's Third Set of Interrogatories D003804- D003807
231.	Plaintiff, Elisa Sales' Supplemental Answers to Barney J. Nemiroff MD's First Set of Interrogatories D003808- D003856
232.	Plaintiff, Elisa Sales' Answers to Barney J. Nemiroff MD's First Set of Special Interrogatories re: Medicare and Medicaid D003857- D003867
233.	Plaintiff, Edgar Sales' Answers to Summerlin Hospital's First Set of Interrogatories D003868- D003892
234.	Plaintiff, Edgar Sales' Supplemental Answers to Summerlin Hospital's First Set of Interrogatories D003893- D003924
235.	Plaintiff, Edgar Sales' Answers to Summerlin Hospital's Second Set of Interrogatories D003925- D003935
236.	Plaintiff, Edgar Sales' Answers to Healthcare Partner's First Set of Interrogatories D003936- D003944
237.	Plaintiff, Edgar Sales' Supplemental Answers to Healthcare Partner's First Set of Interrogatories D003945- D003952
238.	Plaintiff, Edgar Sales' Answers to Barney Nemiroff MD's First Set of Special Interrogatories re: Medicare and Medicaid D003953- D003963
239.	Plaintiff, Edgar Sales' Supplemental Answers to Barney Nemiroff MD's First Set of Interrogatories D003964- D004012
240.	Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' First Set of Interrogatories D004013- D004017
241.	Expert Invoices of Carol V. Anderson, PhD, ABPP-CN; Burroughs Healthcare Consulting Network; Terrence M. Clauretje, PhD, CPA; William J. Mazzei, MD/Perioperative Medical Improvement; Rolynn Navarro, RN, BSN, MBA; Peter Ott, MD; Tarvez Tucker, MD/Oregon Health & Science University; and Susan C. Wright, BSN, RN, CCM, LNCC, CNLCP/M. Salerno & Associates, Inc (As attached as Exhibit 1, to Plaintiffs' Responses to Barney J. Nemiroff's First Set of Request for Production of Documents) D004018- D004054
242.	Expert Curriculum Vitae of Carol V. Anderson, PhD, ABPP-CN; Burroughs Healthcare Consulting Network; Terrence M. Clauretje, PhD, CPA; William J. Mazzei, MD; Rolynn Navarro, RN, BSN, MBA; Peter Ott, MD; Dae Joon Anh, MD; and Tarvez Tucker, MD; and Susan C. Wright, BSN, RN, CCM, LNCC, CNLCP (As attached as Exhibit 2, to Plaintiffs' Responses to Barney J. Nemiroff's First Set of Request for Production of Documents) D004055- D004155

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Exhibit No.	Exhibit Description
243.	Expert Testimony Histories of Terrence M. Clauretie, PhD, CPA; Unidentified; Rolynn Navarro, RN; Peter Ott, MD; Tarvez Tucker, MD; Susan Wright, BSN, RN, CNLCP, LNCC, CCM (As attached as Exhibit 3, to Plaintiffs' Responses to Barney J. Nemiroff's First Set of Request for Production of Documents) D004156- D004185
244.	Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' Second Set of Interrogatories D004186- D004198
245.	Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' First Set of Request for Production of Documents D004199- D004201
246.	Invoices submitted by experts Dr. Rothenberg and Dr. Doshi (As attached as Exhibit A, to Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' Second Set of Request for Production of Documents) D004202- D004206
247.	Correspondence sent to experts Dr. Rothenberg and Dr. Doshi (As attached as Exhibit B, to Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' Second Set of Request for Production of Documents) D004207- D004224
248.	A copy of Dr. Doshi's most current Curriculum Vitae (As attached as Exhibit C, to Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' Second Set of Request for Production of Documents) D004225- D004249
249.	Supplemental invoices submitted by expert Dr. Doshi (As attached as Exhibit A, to Barney J. Nemiroff, M.D.'s Supplemental Responses to Plaintiffs' Second Set of Request for Production of Documents) D004250- D004252
250.	Barney J. Nemiroff, M.D.'s Responses to Plaintiffs' Third Set of Request for Production of Documents D004253- D004257
251.	Alicia Burr, MSN, APRN -Expert Report undated -Expert Report dated August 30, 2019 -Expert Rebuttal Report dated April 12, 2019 D004258- D004268
252.	Alicia Burr, MSN, APRN -Curriculum Vitae -Fee Schedule D004269-D004272
253.	Jeffrey S. Goodman, MD, FACP, FHRS -Expert Report dated December 3, 2018 -Expert Rebuttal Report dated April 5, 2019 -Expert Report dated August 16, 2019 D004273- D004279
254.	Jeffrey S. Goodman, MD, FACP, FHRS -Curriculum Vitae -Fee Schedule -Testimony D004280- D004292

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Exhibit No.	Exhibit Description
255.	Edwin C. Amos, MD -Expert Report dated December 10, 2018 -Expert Report dated February 8, 2019 -Expert Report dated September 3, 2019 -Expert Rebuttal Report dated April 10, 2019 D004293- D004310
256.	Edwin C. Amos, MD -Curriculum Vitae -Fee Schedule -Testimony D004311- D004324
257.	Robert J. Reynolds, MS, MPH, PhD, PStat -Expert Report dated April 16, 2019 -Life Expectancy Report dated August 30, 2019 D004325- D004344
258.	Robert J. Reynolds, MS, MPH, PhD, PStat -Curriculum Vitae -Fee Schedule -Testimony D004345- D004355
259.	Charles A. Pietrafesa, MD, MBA -Expert Rebuttal Report dated April 11, 2019 -List of Materials Reviewed -Supplemental Expert Rebuttal Report dated August 30, 2019 D004356- D004406
260.	Charles A. Pietrafesa, MD, MBA -Resume -Testimony - Fee Schedule D004407- D004411
261.	Samuel M. Lundstrom, PhD -Expert Rebuttal Report dated April 19, 2019 -Supplemental Expert Report dated August 21, 2019 D004412- D004443
262.	Samuel M. Lundstrom, PhD -Curriculum Vitae -Fee Schedule -Testimony D004444- D004448
263.	Aubrey Corwin, MS, LPC, CRC, CLCP -Expert Report dated April 15, 2019 (Life Care Planning) -Expert Report dated April 19, 2019 -Expert Report dated August 26, 2019 D004449- D004519
264.	Aubrey Corwin, MS, LPC, CRC, CLCP -Curriculum Vitae -Fee Schedule -Testimony D004520- D004528
265.	David M. Rothenberg

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Exhibit No.	Exhibit Description
	-Expert Report dated February 8, 2019 -Expert Report dated May 29, 2019 D004529- D004535
266.	David M. Rothenberg -Curriculum Vitae -Fee Schedule D004536- D004565
267.	Rahul Doshi, MD -Expert Report dated February 10, 2019 D004566- D004569
268.	Rahul Doshi, MD -Curriculum Vitae -Fee Schedule D004570- D004588
269.	Byron K. Lee, MD, MAS, FACC -Expert Report dated February 1, 2019 -Expert Report dated April 19, 2019 D004589- D004592
270.	Byron K. Lee, MD, MAS, FACC -Curriculum Vitae -Fee Schedule -Testimony D004593- D004615
271.	Ronald Pearl, MD, PhD -Expert Report dated February 11, 2019 -Expert Report dated April 19, 2019 D004616- D004621
272.	Ronald Pearl, MD, PhD -Curriculum Vitae -Fee Schedule -Testimony D004622- D004650
273.	Thomas F. Kinsora, PhD -Expert Examination Report dated November 7, 2018 D004651- D004725
274.	Thomas F. Kinsora, PhD -Curriculum Vitae -Fee Schedule -Testimony D004726- D004735
275.	David L. Ginsburg, MD -Expert Examination Report dated July 11, 2018 D004736- D004745
276.	David L. Ginsburg, MD -Curriculum Vitae -Fee Schedule -Testimony D004746- D004756
277.	Expert Report attached as Exhibit 1, to Alicia Burr, RN's Videotaped Deposition Transcript D004757- D004759
278.	Rebuttal Report attached as Exhibit 2, to Alicia Burr, RN's Videotaped Deposition Transcript D004760
279.	Curriculum vitae attached as Exhibit 3, to Alicia Burr, RN's Videotaped Deposition Transcript D004761- D004764

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Exhibit No.	Exhibit Description
280.	Document headed "Item No. 7", attached as Exhibit 4, to Alicia Burr, RN's Videotaped Deposition Transcript D004765- D004767
281.	Document headed "Item No. 3", attached as Exhibit 5, to Alicia Burr, RN's Videotaped Deposition Transcript D004768- D004802
282.	Document headed "Item No. 4", attached as Exhibit 6, to Alicia Burr, RN's Videotaped Deposition Transcript D004803- D004805
283.	Heart Rhythm Society Consensus Report attached as Exhibit 7, to Alicia Burr, RN's Videotaped Deposition Transcript D004806- D004849
284.	Curriculum Vitae attached as Exhibit 1, to Barney Nemiroff, MD's Videotaped Deposition Transcript D004850
285.	Anesthesiology record attached as Exhibit 2, to Barney Nemiroff, MD's Videotaped Deposition Transcript D004851- D004852
286.	Cath Lab Report attached as Exhibit 3, to Barney Nemiroff, MD's Videotaped Deposition Transcript D004853- D004872
287.	Cath Lab Report attached as Exhibit 1 to Bozidar Knezevic, RN's Videotaped Deposition Transcript D004873- D004886
288.	Curriculum Vitae attached as Exhibit 1, to Byron Lee, MD's Videotaped Deposition Transcript D004887- D004913
289.	Summerlin Hospital Records attached as Exhibit 2, to Byron Lee, MD's Videotaped Deposition Transcript D004914- D004943
290.	Copies of EKG strips attached as Exhibit 3, to Byron Lee, MD's Videotaped Deposition Transcript D004944- D004986
291.	Patient Safety Event Report attached as Exhibit 1, to Carla Zeluff's Videotaped Deposition Transcript D004987
292.	THIS EXHIBIT IS BLANK
293.	Patient Relations Report attached as Exhibit 3, to Carla Zeluff's Videotaped Deposition Transcript D004993
294.	Neuropsychological Evaluation Report attached as Exhibit A, to Carol Anderson, PhD Deposition Transcript D004994- D005003
295.	Neuropsychological Evaluation Report - Addendum attached as Exhibit B, to Carol Anderson, PhD Deposition Transcript D005004- D005005
296.	Neuropsychological Evaluation Report – Addendum attached as Exhibit C, to Carol Anderson, PhD Deposition Transcript D005006
297.	Neuropsychological Evaluation Report -Rebuttal attached as Exhibit D, to Carol Anderson, PhD Deposition Transcript

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Exhibit No.	Exhibit Description
	D005007- D005013
298.	Dr. Anderson's file for Elisa Sales attached as Exhibit E, to Carol Anderson, PhD Deposition Transcript D005014- D005190
299.	Anesthesiology Record attached as Exhibit 2, to Daejoon Anh, MD's Videotaped Deposition Transcript D005191- D005193
300.	Portion of EKG Strips Hand drawn Diagram attached as Exhibit 3, to Daejoon Anh, MD's Videotaped Deposition Transcript D005194- D005331
301.	Independent Medical Evaluation attached as Exhibit 1, to David Ginsburg, MD's Videotaped Deposition Transcript D005332- D005353
302.	Mini-Mental State Exam attached as Exhibit 2, to David Ginsburg, MD's Videotaped Deposition Transcript D005354- D005376
303.	Report & Curriculum Vitae attached as Exhibit 1, to David Rothenberg, MD's Videotaped Deposition Transcript D005377- D005412
304.	Anesthesia Record as Exhibit 2, to David Rothenberg, MD's Videotaped Deposition Transcript D005413- D005416
305.	Cath lab report attached as Exhibit 2, to Dimitrios Antonopoulos' Videotaped Deposition Transcript D005417- D005436
306.	Preoperative Evaluation Record attached as Exhibit 3, to Dimitrios Antonopoulos' Videotaped Deposition Transcript D005437- D005438
307.	Code documentation attached as Exhibit 4, to Dimitrios Antonopoulos' Videotaped Deposition Transcript D005439
308.	Records attached as Exhibit A, to Divina Averilla, MD Deposition Transcript D005440- D005647
309.	Petition for Appointment of Guardian Ad Litem attached as Exhibit A, to Edgar Sales Deposition Transcript and Exhibits D005648- D005651
310.	Report dated 12/03/18, attached as Exhibit 1, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005652- D005655
311.	Report dated 4/5/19, attached as Exhibit 2, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005656
312.	Curriculum Vitae attached as Exhibit 3, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005657- D005669
313.	Cath Lab Report attached as Exhibit 4, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005670- D005689

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Exhibit No.	Exhibit Description
314.	Cath Lab Report attached as Exhibit 5, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005690- D005699
315.	Anesthesia record attached as Exhibit 6, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005700- D005702
316.	EKG strips attached as Exhibit 7, to Jeffrey Goodman, MD's Videotaped Deposition Transcript D005703- D005792
317.	One page from Anesthesia Record attached as Exhibit 1, to Jesse Hanna, RN's Videotaped Deposition Transcript D005793
318.	Dr. Anh's Report attached as Exhibit 2, to Jesse Hanna, RN's Videotaped Deposition Transcript D005794- D005795
319.	Sales v. Summerlin Hospital and Medical Center et al. Timeline, attached as Exhibit A, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005796- D005837
320.	Curriculum vitae attached as Exhibit B, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005838- D005873
321.	Deposition transcript of Jonathan Burroughs, M.D. in Polk vs. Sunrise Hospital, May 5, 2016, attached as Exhibit C, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005874- D005908
322.	Deposition transcript of Jonathan H. Burroughs, M.D. in Begay vs. Medicus Healthcare Solutions, LLC, attached as Exhibit D, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005909- D005961
323.	Printout for website of Burroughs Healthcare Consulting Network attached as Exhibit E, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005962- D005969
324.	The Joint Commission Quality Report attached as Exhibit F, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005970- D005975
325.	Darling versus Charleston Community Memorial Hospital case attached as Exhibit G, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005976- D005983
326.	Negative Citing References for Darling v. Charleston Community Memorial Hospital attached as Exhibit H, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005984- D005986
327.	Negative Citing References for Thompson v. Nason Hospital attached as Exhibit I, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005987- D005988
328.	Gafner v. Down Ease Community Hospital case attached as Exhibit J, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005989- D005998

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Exhibit No.	Exhibit Description
329.	Renown Health v. Vanderford case attached as Exhibit L, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D005999- D006004
330.	Browning vs. Burt case attached as Exhibit M, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006005- D006024
331.	Negative Citing References for Browning vs. Burt, attached as Exhibit N, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006025- D006026
332.	Price vs. Sinnott case attached as Exhibit O, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006027- D006033
333.	Excerpts from deposition transcript of Eufrocina Bautista, R.N., April 10, 2019, attached as Exhibit P, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006034- D006035
334.	Excerpts from deposition testimony of Bozidar Knezevic, R.N., February 20, 2018, attached as Exhibit Q, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006036- D006037
335.	Excerpts from deposition of Jan Sayoc, R.N., February 20, 2018, attached as Exhibit R, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006038- D006039
336.	Excerpts from deposition of Jesse Hanna, March 27, 2018, attached as Exhibit S, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006040- D006042
337.	The Valley Health System alarm safety policy attached as Exhibit T, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006043- D006047
338.	Hospital National Patient Safety Goals, effective January 2017, attached as Exhibit U, to Jonathan Burroughs, MD's Videotaped Deposition Transcript D006048- D006050
339.	6/27/19, Supplemental Affidavit of Jonathan Burroughs, M.D., attached as Exhibit W, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006051- D006065
340.	8/26/19, Supplemental Affidavit of Jonathan Burroughs, M.D., attached as Exhibit X, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006066- D006079
341.	Joint Commission Quality Report of Summerlin Hospital Medical Center attached as Exhibit Y, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006080- D006085
342.	Joint Commission "Culture of Safety" Standards, attached as Exhibit Z, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006086- D006092

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Exhibit No.	Exhibit Description
343.	Alarm Safety Policy attached as Exhibit AA, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006093- D006097
344.	ACEP Policy Statement re: ALSC (Jan. 2016), attached as Exhibit BB, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006098
345.	NAC 632.216, document, attached as Exhibit CC, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006099
346.	NAC 449.3622, document attached as Exhibit DD, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006100
347.	Summerlin Hospital Medical Staff By-Laws attached as Exhibit EE, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006101- D006169
348.	Summerlin Hospital Sedation Moderate (Conscious) and Deep Policy attached as Exhibit FF, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006170- D006175
349.	Privilege Log for Patient Safety Event Report re: Sales v. Summerlin Hospital, et al, attached as Exhibit GG, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006176
350.	Summerlin Hospital Code Blue Resuscitation (12/18), attached as Exhibit HH, to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006177- D006178
351.	Summerlin Hospital Code Blue-Resuscitation (3/16) attached as Exhibit HH (re-marked), to Jonathan Burroughs, MD's continued Videotaped Deposition Transcript D006179- D006180
352.	Curriculum Vitae attached as Exhibit A, to Peter Ott's Deposition Transcript D006181-D006196
353.	Nevada Revised Statute 42.001, attached as Exhibit B, to Peter Ott's Deposition Transcript D006197
354.	EKG Strips attached as Exhibit C, to Peter Ott's Deposition Transcript D006198- D006378
355.	Affidavit of Rolynn Navarro, RN, BSN, MBA, attached as Exhibit A, to Rolynn Navarro Deposition Transcript D006379- D006381
356.	Expert Report attached as Exhibit B, to Rolynn Navarro Deposition Transcript D006382- D006390
357.	Response to Medical Expert Reviewer -Alicia Burr, MSN, APRN, attached as Exhibit C, to Rolynn Navarro Deposition Transcript D006391- D006392

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Exhibit No.	Exhibit Description
358.	Patient Safety Event Report attached as Exhibit D, to Rolyann Navarro Deposition Transcript D006393- D006394
359.	Deposition of Bozidar Knezevic, RN, attached as Exhibit E, to Rolyann Navarro Deposition Transcript D006395- D006475
360.	Deposition of Jan Sayoc, RN, attached as Exhibit F, to Rolyann Navarro Deposition Transcript D006476- D006511
361.	Deposition of Barney J.Nemiroff, M.D., attached as Exhibit G, to Rolyann Navarro Deposition Transcript D006512- D006555
362.	EKG Strips attached as Exhibit H, to Rolyann Navarro Deposition Transcript D006556- D006599
363.	Alarm Safety Policy attached as Exhibit I, to Rolyann Navarro Deposition Transcript D006600- D006604
364.	List of Equipment with Audible Alarms attached as Exhibit J, to Rolyann Navarro Deposition Transcript D006605
365.	Curriculum Vitae attached as Exhibit K, to Rolyann Navarro Deposition Transcript D006606- D006609
366.	Declaration of Ronald Pearl, MD - 2/11/19, attached as Exhibit 1, to Ronald Pearl, MD's Videotaped Deposition Transcript D006610- D006612
367.	Declaration of Ronald Pearl, MD - 4/19/19, attached as Exhibit 2, to Ronald Pearl, MD's Videotaped Deposition Transcript D006613- D006615
368.	Curriculum Vitae attached as Exhibit 3, to Ronald Pearl, MD's Videotaped Deposition Transcript D006616- D006643
369.	Heart Rhythm Society Expert Consensus Report, attached as Exhibit 4, to Ronald Pearl, MD's Videotaped Deposition Transcript D006644- D006686
370.	Anesthesia Record attached as Exhibit 5, to Ronald Pearl, MD's Videotaped Deposition Transcript D006687- D006689
371.	Cath lab report attached as Exhibit 6, to Ronald Pearl, MD's Videotaped Deposition Transcript D006690- D006719
372.	EKG Strips attached as Exhibit 7, to Ronald Pearl, MD's Videotaped Deposition Transcript D006720- D006810
373.	Summerlin Hospital Medical Center Medical Staff Bylaws attached as Exhibit 2, to Stephanie Davidson, DO Deposition Transcript D006811- D006868
374.	Summerlin Hospital Medical Center Policy Title: Code Blue/Resuscitation attached as Exhibit 3, to Stephanie Davidson, DO Deposition Transcript D006869- D006872
375.	Summerlin Hospital Medical Center Policy Title: Sedation - Moderate (Conscious) and Deep attached as Exhibit 4, to Stephanie Davidson, DO Deposition Transcript D006873- D006878

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Exhibit No.	Exhibit Description
376.	Résumé of Susan Wright, R.N., attached as Exhibit 1, to Susan Wright's Deposition Transcript D006879- D006880
377.	Two life care plans created by Susan Wright, R.N., attached as Exhibit 2, to Susan Wright's Deposition Transcript D006881- D006952
378.	Medical Records attached as Exhibit A, to Tali Arik, MD Deposition Transcript D006953- D007037
379.	Testimony List attached as Exhibit A, to Tarvez Tucker, MD Deposition Transcript D007038
380.	Fee Schedule attached as Exhibit B, to Tarvez Tucker, MD Deposition Transcript D007039
381.	Medical Report attached as Exhibit C, to Tarvez Tucker, MD Deposition Transcript D007040- D007050
382.	Expert Report attached as Exhibit D, to Tarvez Tucker, MD Deposition Transcript D007051- D007057
383.	Rebuttal Report attached as Exhibit E, to Tarvez Tucker, MD Deposition Transcript D007058- D007062
384.	Life Care Plan attached as Exhibit 1, to Tarvez Tucker, MD Deposition Transcript D007063- D007093
385.	Life Care Plan attached as Exhibit 2, to Tarvez Tucker, MD Deposition Transcript D007094- D007157
386.	Curriculum Vitae attached as Exhibit 3, to Tarvez Tucker, MD Deposition Transcript D007158- D007170
387.	Report attached as Exhibit A, to Terrence Clauretje, PhD Deposition Transcript D007171- D007190
388.	Report attached as Exhibit B, to Terrence Clauretje, PhD Deposition Transcript D007191- D007203
389.	Report attached as Exhibit C, to Terrence Clauretje, PhD Deposition Transcript D007204- D007223
390.	Handwritten notes attached as Exhibit D, to Terrence Clauretje, PhD Deposition Transcript D007224
391.	Curriculum Vitae attached hereto as Exhibit 1, to Thomas Kinsora, PhD's Videotaped Deposition Transcript D007225- D007226
392.	Assessment of Neurocognition attached hereto as Exhibit 2, to Thomas Kinsora, PhD's Videotaped Deposition Transcript D007227- D007312
393.	Test Results of Neurocognitive Functioning attached hereto as Exhibit 3, to Thomas Kinsora, PhD's Videotaped Deposition Transcript D007313- D007315
394.	Affidavit of Willaim [sic] J. Mazzei MD, attached as Exhibit 1, to William Mazzei, MD Deposition Transcript D007316- D007321

Exhibit No.	Exhibit Description
395.	Affidavit of William J. Mazzei, M.D., attached as Exhibit 2, to William Mazzei, MD Deposition Transcript D007322- D007328
396.	Perioperative Medical Improvement Re: Elisa Sales, attached as Exhibit 3, to William Mazzei, MD Deposition Transcript D007329- D007335
397.	Perioperative Medical Improvement Re: Rebuttal to Expert Reports, attached as Exhibit 4, to William Mazzei, MD Deposition Transcript D007336- D007339
398.	Document List (of Dr. Mazzei), attached as Exhibit A, to William Mazzei, MD (continued) Deposition Transcript D007340- D007341
399.	Patient Safety Event Report attached as Exhibit 2, to Zia Khan, MD's Videotaped Deposition Transcript D007342
400.	Alarm Safety Policy, attached as Exhibit 3, to Laura Fiaccato's Videotaped Deposition Transcript D007343- D007347
401.	Cardiac Cath Lab Scope of Services: Hemodynamic Studies, Preoperative Elective Studies, Postoperative Elective Studies, Emergency Procedures; attached as Exhibit 4, to Laura Fiaccato's Videotaped Deposition Transcript D007348- D007349
402.	Operative Record 7/8/2016, attached as Exhibit 5, to Laura Fiaccato's Videotaped Deposition Transcript D007350- D007351
403.	Cath Lab Report attached as Exhibit 6, to Laura Fiaccato's Videotaped Deposition Transcript D007352- D007381
404.	EKG Strip attached as Exhibit 7, to Laura Fiaccato's Videotaped Deposition Transcript D007382- D007424

Defendants submit the following list of exhibits noted below. Defendants reserve the right to supplement this list prior to trial. Defendants do not represent that they will use any of said exhibits at trial, only that they may. In addition, Defendants reserve the right to use any document identified in the exhibit list of any party.

D. Defendants' demonstrative exhibits

1
2 **Defendants Summerlin Hospital and Medical Center, Jan Sayoc, RN, and Bozidar Knezevic,**
3 **RN:**

4 1. Defendants may offer at trial certain Exhibits for demonstrative purposes including,
5 but not limited to, the following:

- 6 a. Anatomical drawings
- 7 b. Written reports by designated experts
- 8 c. CVs of any/or all designated experts or treating physicians
- 9 d. Enlargement of portions of reports prepared by experts
- 10 e. Representational charts, graphs, time-lines, models, medical illustrations
- 11 f. Story boards and computer digitized power point images
- 12 g. Blow-ups/transparencies/digitized images of medical records, imaging studies,
13 medical bills, photographs, letters, affidavits, and other exhibits pertaining to
14 Plaintiff
- 15 h. Any and all deposition transcripts in this case, including documents designated
16 as exhibits to those deposition transcripts
- 17 i. All discovery and discovery responses in this case
- 18 j. Any or all of the medical text, medical literature, medical journals, or medical
19 articles previously identified in this case
- 20 k. Medical research articles referred to or relied upon by designated experts
- 21 l. Videos/Photographs relating to, but not limited to, those obtained of Plaintiffs
22 and recordings of the subject area.
- 23 m. Animated EKG tracings
- 24 n. Exemplary medical physiological diagrams

25 2. Defendants reserve the right to utilize any demonstrative exhibit utilized or identified
26 by any other party to this litigation.

27 3. Defendants reserve the right to supplement this list of demonstrative exhibits.

28 **E. Defendants' miscellaneous exhibits/reservations**

1 3.The parties shall make no reference and/or produce evidence regarding insurance
2 coverage and/or SUMMERLIN HOSPITAL AND MEDICAL CENTER, LLC as a self-
3 insured entity;

4 4.The parties shall not refer to their relative wealth and/or financial condition unless
5 punitive damages are permitted by this Court and the jury determines that punitive
6 damages are warranted against SUMMERLIN HOSPITAL AND MEDICAL CENTER,
7 LLC, at which time Plaintiffs' counsel may seek to admit evidence of financial condition
8 to present during a punitive damages phase of the trial;

9 5. Laura Fiaccato, Dr. Khan, nor Dr. Davidson will offer opinions or otherwise comment
10 on Plaintiff's EKG strips at the time of the subject incident.

11 6. Dr. Byron Lee and Dr. Ronald G. Pearlwill not be called as witnesses at the time of trial.

12 The Court has also made the following rulings as to the limitations of evidence:
13

14 1. Collateral source evidence as billed through federally sourced payors is precluded
15 in accordance of NRS 42.021 and the holding in *McCrosky*. Those payments not subject to the
16 federal interest rights of subrogation may be admissible upon leave from this Court.
17

18 There currently are no other agreements as to the limitation or exclusion of evidence
19 governing this matter. The parties reserve all objections to the documentary evidence until the time
20 of trial.
21

22 **VII.**

23 **LIST OF WITNESSES**

24 **A. PLAINTIFF'S WITNESSES:**

25 Plaintiffs submit their list of witnesses, as noted below. Plaintiffs do not represent that they
26 will call any of said witnesses at trial, only that they may. In addition, Plaintiffs reserve the right
27 to call at trial any witnesses identified by any other party to this action. Plaintiffs reserve the right
28

1 to withdraw any witness identified. Inclusion of a witness on this list is not an admission that such
 2 witness has relevant, admissible testimony, and in the case of experts, is not an admission that the
 3 witness is qualified to give expert testimony in any particular field or that a proper foundation can
 4 be laid for the witnesses' opinions. Plaintiffs reserve the right to withdraw any witnesses identified.

5	2.	Edgar Sales c/o Carol F. Hay, Esq. 4101 Meadows Lane, Suite 100 Las Vegas, NV 89107 702 - 433-3334
6	3.	Jan Sayoc, R.N. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
7	4.	Bozidar Knezevic, R.N. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
8	5.	Daejoon Anh, M.D. c/o Phillip S. Aurbach, Esq. Christian T. Balducci, Esq. Marquis Aurbach Coffing 10001 Park Run Drive Las Vegas, NV 89145 702 - 382-0711
9	6.	Barney J. Nemiroff, M.D. c/o Patricia Egan Daehnke, Esq. Linda K. Rurangirwa, Esq. Collinson, Daehnke, Inlow & Greco 2110 East Flamingo Road, Suite 305 Las Vegas, NV 89119 702 - 979-2132
10	7.	Farooq Shaikh, M.D. 6088 S. Durango Dr., Suite D100 Las Vegas, NV 89113
11	8.	Shaheen Chowdhry, M.D. P.O. Box 98978

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

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	Las Vegas, NV 89193-8978 702 - 360-7600
9.	Joel Orevillo, M.D. Robert M. Lampert, M.D. 7200 Cathedral Rock Dr., Suite 170 Las Vegas, NV 89128 702 - 255-7245
10.	David Navratil, M.D. P.O. Box 98978 Las Vegas, NV 89193-8978 702 - 407-0110
11.	Emmanuel Onwutuebe, M.D. 6771 W. Charleston Blvd., #C Las Vegas, NV 89146 702 - 450-1717
12.	Cyndi Tran, D.O. 2020 Goldring Ave., Suite 202 Las Vegas, NV 89106 702 - 732-2600
13.	Maria C. Adolfo, M.D. 5785 S. Fort Apache Rd. Suite 100-B Las Vegas, NV 89148 702-228-3111
14.	Divina G. Averilla, M.D. 9320 W. Sahara Ave. Las Vegas, NV 89117 702 - 383-3850
15.	John Bradley Bedotto, M.D. 9280 W. Sunset Road, Suite 320 Las Vegas, NV 89148 702 - 534-5464
16.	Sanjave Parsad (Biotronic representative) Address to be provided
17.	Robert Wesley, M.D. 7455 W. Washington Ave. Las Vegas, NV 89128 702 - 240-6482
18.	Jesse Hanna c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
19.	Bijan Ahrari, M.D. (Endocrinologist)

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	3150 N. Tenaya Way, Suite 415 Las Vegas, NV 89128
20.	Tali Arik 5067 Semifronte Drive Pahrump, NV 89061 702-591-3189
21.	Eufrocina Bautista, R.N. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
22.	Dimitrios Antonopoulos c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
23.	Laura Fiacatto, Director, Cardiac Cath Lab c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
24.	Carla Zeluff, Risk Manager c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
25.	Stephanie L. Davidson, D.O. c/o Carroll, Kelly, Trotter, Franze, McBride & Peabody 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89113 702 - 792-5855
27.	Zia U. Khan, M.D., Chair of the Cardiac Cath Lab c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400

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28.	Carol V. Anderson, Ph.D., ABPP-CN 3670 S. 25th E. Suite 2 Idaho Falls, ID 83404
29.	Jonathan Burroughs, M.D. The Burroughs Healthcare Consulting Network 48 Forest Ledge Road P.O. Box 540 Glen, NH 03838
30.	Terrence M. (Mike) Clauretie, Ph.D., CPA 217 Palmetto Pointe Dr. Henderson, NV 89012
31.	William J. Mazzei, M.D. Perioperative Medical Improvement 9707 Caminito Suelto San Diego, CA 92131-2115
32.	Rolynn Navarro, R.N. 7537 Mesa Verde Trail Fort Worth, TX 76137
33.	Peter Ott, M.D. Assoc. Professor of Clinical Medicine Section of Cardiology 1501 N. Campbell Ave. P.O. Box 24-5037 Tucson, AZ 85724
34.	Tarvez Tucker, M.D. 3900 SW Condor Ave. Portland, OR 97239
35.	Susan C. Wright, R.N. M. Salerno & Assoc. P.O. Box 5207 Maryville, TN 37801
36.	David L. Ginsburgh, M.D. 8550 W. Charleston Blvd., Suite 102-213 Las Vegas, NV 89117
37.	Thomas F. Kinsora, Ph.D. Kinsora Institute of Neuroscience 716 South Sixth Street Las Vegas, NV 89101
38.	Jeffrey S. Goodman, M.D. 8631 W. Third St., Suite #445E Los Angeles, CA 90048
39.	Edwin C. Amos, M.D. 2021 Santa Monica Blvd., Suite 525E Santa Monica, CA 90404
40.	Alicia Burr, R.N.

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	c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 N. Town Center Dr., Suite 200 Las Vegas, NV 89144
41.	Charles A. Pietrafesa, M.D., MBA 12139 La Casa Lane Los Angeles, CA 90049
42.	Samuel M. Lundstron, Ph.D. 8505 Freeport Parkway Irving, TX 75063
43.	Aubrey A. Corwin, MS, LPC, CRC, CLCP Director, Vocational Diagnostics, Inc. 1942 Broadway, #314 Boulder, CO 80302
44.	Robert J. Reynolds, MS, MPH, Ph.D., PStat Mortality Research & Consulting, Inc. 1855 Raintree Circle El Lago, TX 77586
45.	David M. Rothenberg, M.D. Rush University Medical Center 1653 West Congress Parkway Chicago, IL 60612
46.	Rahul Doshi, M.D. 1510 San Pablo St., Suite 322 Los Angeles, CA 90033
47.	Niuton S. Koide, M.D. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400
48.	Analynn Sanchez (daughter) 562-417-0229
49.	Cristina Sales (daughter) 562-508-7977
50.	Melodia Mangano (friend) 702-301-0336
51.	Roy Mangano (friend) 310-435-3487
52.	Joy Marie Villar (friend) 702-302-2347
53.	Lani Tongol (Accountant) 702-768-4548

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54.	Samuel Gania (Deacon, retired) 702-506-2158
55.	Roxane Fulinara 702-945-0600
56.	Elane Gapon 702-326-8728
57.	Ellen Gana 702-335-8176

Plaintiffs reserve the right to call as a witness, any person listed by the Defendants in this matter, including experts, and to cross-examine each witness called by the other party. Plaintiffs further reserve the right to call any impeachment and rebuttal witnesses as necessary. Plaintiffs further reserve the right to use any testimony given in the depositions of any Defendants' witnesses that were disclosed during the trial of this matter. By disclosing witnesses, Plaintiffs do not waive the right to challenge and exclude testimony or portions thereof on any basis

The Plaintiffs Will Use/Present the following Deposition Testimony if the Witness is Unavailable at the Time of Trial.

1.	Deposition Transcript, video tape and exhibits thereto of Daejoon Anh, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
2.	Deposition Transcript, video tape and exhibits thereto of Dimitrios Antonopoulos (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
3.	Deposition Transcript, video tape and exhibits thereto of Eufrocina Bautista, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
4.	Deposition Transcript, video tape and exhibits thereto of Alicia Burr, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
5.	Deposition Transcript and exhibits thereto of Jonathan Burroughs, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
6.	Deposition Transcript and exhibits thereto of Terrence M. Clauretie, Ph.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)

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7.	Deposition Transcript, video tape and exhibits thereto of Stephanie Davidson, D.O., 30(b)(6) witness (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
8.	Deposition Transcript, video tape and exhibits thereto of Stephanie Davidson, D.O., Chair of Anesthesiology Department (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
9.	Deposition Transcript, video tape and exhibits thereto of Laura Fiaccato, 30(b)(6) witness Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
10.	Deposition Transcript, video tape and exhibits thereto of Laura Fiaccato, Director Cardiac Cath Lab Department (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
11.	Deposition Transcript, video tape and exhibits thereto of David Ginsburg, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
12.	Deposition Transcript, video tape and exhibits thereto of Jesse Hanna (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
13.	Deposition Transcript, video tape and exhibits thereto of Bozidar Knezevic, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
14.	Deposition Transcript, video tape and exhibits thereto of Barney Nemiroff, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
15.	Deposition Transcript and exhibits thereto of Peter Ott, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
16.	Deposition Transcript, video tape and exhibits thereto of Ronald Pearl, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
17.	Deposition Transcript , video tape and exhibits thereto of Jan Sayoc, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
18.	Deposition Transcript, video tape and exhibits thereto of Byron Lee, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
19.	Deposition Transcript, video tape and exhibits thereto of Jeffrey Goodman, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
20.	Deposition Transcript, video tape and exhibits thereto of Charles Pietrafesa (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
21.	Deposition Transcript, video tape and exhibits thereto of Thomas Kinsora, Ph.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)

22.	Deposition Transcript, video tape and exhibits thereto of David Rothenberg, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
23.	Deposition Transcript, video tape and exhibits thereto of Zia U. Khan, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
24.	Deposition Transcript, video tape and exhibits thereto of Niuton S. Koide, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
25.	Deposition Transcript and exhibits thereto of Divina Averilla, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
26.	Deposition Transcript and exhibits thereto of Tali Arik, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
27.	Deposition Transcript, video tape and exhibits thereto of Carla Zeluff (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
28.	Deposition Transcript and exhibits thereto of Carol Anderson, Ph.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
29.	Deposition Transcript and exhibits thereto of William Mazzei, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
30.	Deposition Transcript and exhibits thereto of Rolyann Navarro, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
31.	Deposition Transcript and exhibits thereto of Tarvez Tucker, M.D. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
32.	Deposition Transcript and exhibits thereto of Susan Wright, R.N. (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
33.	Deposition Transcript and exhibits thereto of Edgar Sales (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
34.	Deposition Transcript and exhibits thereto of Christina Sales (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
35.	Deposition Transcript and exhibits thereto of Analynn Sanchez (Plaintiffs preserve the right to use only portions of the transcripts or exhibits thereto)
36.	Deposition Transcript and exhibits thereto of GE Medical Systems Information Technologies, Inc., 30(b)(6) witness

B. Witnesses Defendants expects to present at trial:

Defendants Summerlin Hospital and Medical Center, Jan Sayoc, RN, and Bozidar Knezevic, RN:

1 Defendants submit their list of witnesses, as noted below. Defendants do not represent that
 2 they will call any of said witnesses at trial, only that they may. In addition, Defendants reserve the
 3 right to call at trial any witnesses identified by any other party to this action. Defendants reserve
 4 the right to withdraw any witness identified. Inclusion of a witness on this list is not an admission
 5 that such witness has relevant, admissible testimony. Defendants reserve the right to withdraw any
 6 witnesses identified.

NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
1.	Elisa Sales c/o Carol F. Hay, Esq. CAROL F. HAY, P.C. 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107	Per Plaintiffs' counsel, this witness is unable to testify due to cognitive deficits		
2.	Edgar Sales c/o Carol F. Hay, Esq. CAROL F. HAY, P.C. 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107			X
3.	Jan Sayoc, RN c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. c/o HALL, PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, Nevada 89144	X		
4.	Bozidar Knezevic, RN c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. c/o HALL, PRANGLE & SCHOONVELD, LLC 1160 North Town Center Drive, Suite 200 Las Vegas, Nevada 89144	X		
5.	Daejoon Anh, M.D. c/o Phillip S. Aurbach, Esq. Christian Balducci, Esq. MARQUIS AURBACH COFFING 10001 Park Run Drive Las Vegas, Nevada 89145			X

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NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
6.	Person Most Knowledgeable Daejoon Anh, M.D., P.C. and/or Health Care Partners c/o Phillip S. Aurbach, Esq. Christian Balducci, Esq. MARQUIS AURBACH COFFING 10001 Park Run Drive Las Vegas, Nevada 89145			X
7.	Barney Joseph Nemiroff, M.D. and/or Barney Nemiroff, M.D., PLLC and/or Nevada Anesthesiology Partners, LLC c/o Patricia Egan Daehnke, Esq. Katherine J. Gordon, Esq. DAEHNKE STEVENS, LLP 2300 W. Sahara Ave., Ste. 680, Box 32 Las Vegas, Nevada 89102	X		
8.	Divina G. Averilla, M.D. HealthCare Partners of Nevada c/o Phillip S. Aurbach, Esq. Brianna Smith, Esq. MARQUIS AURBACH COFFING 10001 Park Run Drive Las Vegas, Nevada 89145		X	
9.	John Bradley Bedotto, M.D. 9280 W. Sunset Road, Suite 320 Las Vegas, Nevada 89148			X
10.	Sanjave Parsad Biotronick, Inc. 6024 Jean Road Lake Oswego, Oregon 97035			X
11.	Person Most Knowledgeable and/or Custodian of Records Mountainview Hospital 3100 N. Tenaya Way Las Vegas, Nevada 89128			X
12.	Joel Orevillo, M.D. Pulmonary Associates 7200 Cathedral Rock Dr., Suite 170 Las Vegas, Nevada 89128			X
13.	Robert M. Lampert, M.D. Pulmonary Associates 7200 Cathedral Rock Dr., Suite 170			X

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NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
	Las Vegas, Nevada 89128			
14.	Person Most Knowledgeable and/or Custodian of Records Spring Valley Hospital 5400 S. Rainbow Blvd. Las Vegas, Nevada 89118			X
15.	Person Most Knowledgeable and/or Custodian of Records University Medical Center 1800 W. Charleston Blvd. Las Vegas, Nevada 89102			X
16.	Robert Wesley, M.D. 7455 W. Washington Ave. Las Vegas, Nevada 89128			X
17.	Person Most Knowledgeable and/or Custodian of Records Shaheen Chowdhry, M.D. PO Box 98978 Las Vegas, Nevada 89193			X
18.	Maria C. Adolfo, M.D. and/or Person Most Knowledgeable and/or Custodian of Records 5785 S. Fort Apache Road, Suite 100-B Las Vegas, Nevada 89148			X
19.	Person Most Knowledgeable and/or Custodian of Records Canyon Vista Rehabilitation/Canyon Vista Post Acute 6352 Medical Center Street Las Vegas, Nevada 89148			X
20.	Cyndi Tran, D.O. and/or Person Most Knowledgeable and/or Custodian of Records Desert Neurology 2020 Goldring Ave., Suite 202 Las Vegas, NV 89106			X
21.	Jesse Hanna c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. c/o HALL, PRANGLE & SCHOONVELD, LLC	X		

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NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
	1160 North Town Center Drive, Suite 200 Las Vegas, Nevada 89144			
22.	Eufrocina Bautista, R.N. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 north Town Center Dr., Suite 200 Las Vegas, NV 89144 702-889-6400	X		
23.	Dimitrios Antonopoulos c/o Casey W. Tyler, Esq. Marjorie E. Kratsas. Esq. Hall Prangle & Schooveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702-889-6400	X		
24.	Laura Fiacatto, Director, Cardiac Cath Lab c/o Casey W. Tyler, Esq. Marjorie E. Kratsas. Esq. Hall Prangle & Schooveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702-889-6400	X		
25.	Carla Zeluff, Risk Manager c/o Casey W. Tyler, Esq. Marjorie E. Kratsas. Esq. Hall Prangle & Schooveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702-889-6400	X		
26.	Stephanie L. Davidson, D.O. c/o Carroll, Kelly, Trotter, Franze, McBride & Peabody 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89113 702- 792-5855	X		
27.	Zia Khan, MD c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		

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NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
28.	Bijan Ahrari, M.D. Person Most Knowledgeable and/or Custodian of Records 3150 N. Tenaya Way, Suite 415 Las Vegas, NV 89128			X
29.	Jeffrey S. Goodman, M.D., FACP, FHRS c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
30.	Edwin C. Amos, M.D. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
31.	Alicia Burr, RN c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
32.	Charles A. Pietrafesa, M.D., MBA c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
33.	Samuel M. Lundstrom, PhD c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
34.	Aubrey A. Corwin, MS, LPC, CRC, CLCP c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq.	X		

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NO	WITNESS	EXPECTED TO BE PRESENT AT TRIAL	SUBPOENAED FOR TRIAL	MAY BE CALLED IF THE NEED ARISES
	Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400			
35.	Robert J. Reynolds, MS, MPH, PhD, PStat c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400	X		
36.	Tali Arik, MD 5067 Semifonte Drive. Pahrump, Nevada 89061 702-591-3189		X	
37.	Niuton Koide, MD c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400			X
38.	Scott Hunter Russell H. Gary G. Hunter Investigative Group, Inc. c/o Casey W. Tyler, Esq. Marjorie E. Kratsas, Esq. Hall Prangle & Schoonveld 1160 North Town Center Dr., Suite 200 Las Vegas, NV 89144 702 - 889-6400			X

Defendants do not intend to present any testimony by deposition in lieu of the witness' appearance and live testimony at the time of trial. However, Defendants reserve the right to present testimony via deposition should any of the following witnesses become unavailable for trial or to be used for rebuttal and/or impeachment purposes.

1. Deposition transcript of Alicia Burr, RN, and all exhibit(s) thereto.
2. Deposition transcript of Annalynn Sanchez, and all exhibit(s) thereto.

HALL PRANGLE & SCHOONVELD, LLC

1160 NORTH TOWN CENTER DRIVE

SUITE 200

LAS VEGAS, NEVADA 89144

TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

- 1 3. Deposition transcript of Barney Nemiroff, MD, and all exhibit(s) thereto.
- 2 4. Deposition transcript of Bozidar Knezevic, R.N., and all exhibit(s) thereto.
- 3 5. Deposition transcript of Byron Lee, MD, and all exhibit(s) thereto.
- 4 6. Deposition transcript of Carla Zeluff, RN, and all exhibit(s) thereto.
- 5 7. Deposition transcript of Carol Anderson, PhD, and all exhibit(s) thereto.
- 6 8. Deposition transcript of Charles Pietrafesa, MD., and all exhibit(s) thereto.
- 7 9. Deposition transcript of Christina Sales, and all exhibit(s) thereto.
- 8 10. Deposition transcript of Daejoon An, MD, and all exhibit(s) thereto.
- 9 11. Deposition transcript of David Ginsburg, MD, and all exhibit(s) thereto.
- 10 12. Deposition transcript of David Rothernberg, MD, and all exhibit(s) thereto.
- 11 13. Deposition transcript of Dimitrios Antonopoulos, and all exhibit(s) thereto.
- 12 14. Deposition transcript of Divina Averilla, M.D., and all exhibit(s) thereto.
- 13 15. Deposition transcript of Edgar Sales, and all exhibits(s) thereto.
- 14 16. Deposition transcript of Eufrocina Bautista, RN, and all exhibit(s) thereto.
- 15 17. Deposition transcript of Jan Sayoc, RN, and all exhibit(s) thereto.
- 16 18. Deposition transcript of Jeffrey Goodman, MD, and all exhibit(s) thereto.
- 17 19. Deposition transcript of Jesse Hanna, RN, and all exhibit(s) thereto.
- 18 20. Deposition transcript(s) of Jonathan Burroughs, MD, and all exhibit(s) thereto.
- 19 21. Deposition transcript(s) of Laura Fiaccato, RN, and all exhibit(s) thereto.
- 20 22. Deposition transcript of Niuton Koide, MD, and all exhibit(s) thereto.
- 21 23. Deposition transcript of Peter Ott, MD, and all exhibit(s) thereto.
- 22 24. Deposition transcript of Rolyynn Navarro, RN, and all exhibit(s) thereto.
- 23 25. Deposition transcript of Ronald Pearl, MD, and all exhibit(s) thereto.
- 24 26. Deposition transcript(s) of Stephanie Davidson, MD, and all exhibit(s) thereto.
- 25 27. Deposition transcript of Susan Wright, and all exhibit(s) thereto.
- 26 28. Deposition transcript of Tali Arik, MD, and all exhibit(s) thereto.
- 27 29. Deposition transcript of Terrence Claurette, PhD, and all exhibit(s) thereto.
- 28 30. Deposition transcript of Thomas Kinsora, PhD, and all exhibit(s) thereto.

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- 31. Deposition transcript(s) of William Mazzei, MD, and all exhibit(s) thereto.
- 32. Deposition transcript of Zia Khan, MD, and all exhibit(s) thereto.

VIII.

PRINCIPAL ISSUES OF LAW

- 1. Whether Dr. Nemiroff is an Ostensible Agent of Defendant Summerlin Hospital.
- 2. Whether Defendants, directly and/or through their agents and/or employees were professionally negligent in the care and treatment provided to Plaintiff.
- 3. Whether Defendant Summerlin Hospital was Corporately Negligent.
- 4. Whether any alleged negligence by Defendants caused injury to Plaintiff.
- 5. Whether Plaintiffs suffered damages as a result of any injury caused by negligence.
- 6. Defendants contend that there was no negligence and Plaintiff's injury was a known risk of the surgical procedure which Plaintiff was informed of and consented to.

IX.

ESTIMATED TIME FOR TRIAL

The parties estimate the trial will take 4 weeks.

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X.
OTHER MATTERS

None at this time.

<p>CLAGGETT & SYKES LAW FIRM</p> <p><i>/s/: Jennifer Morales, Esq.</i> 9/23/19</p> <hr/> <p>Sean K. Claggett, Esq. Date Nevada Bar No. 008407 Jennifer Morales, Esq. Nevada Bar No. 008829 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107 (702) 655-2346 – Telephone</p> <p>CAROL F. HAY, P.C. CAROL F. HAY, ESQ. Nevada Bar No. 8112 4101 Meadows Lane, Suite 100 Las Vegas, NV 89107 Phone: 702 - 433-3334 <i>Attorneys for Plaintiffs</i></p>	<p>HALL PRANGLE & SCHOONVELD, LLC.</p> <p><i>/s/: Marjorie E. Kratsas, Esq.</i> 9/23/19</p> <hr/> <p>Casey W. Tyler, Esq. Date Nevada Bar No. 9706 Marjorie E. Kratsas, Esq. Nevada Bar No. 12934 Michael E. Prangle, Esq. Nevada Bar No. 8619 HALL PRANGLE & SCHOONVELD, LLC. 1160 N. Town Center Drive, Suite 200 Las Vegas, Nevada 89144 <i>Attorneys for Defendants Summerlin Hospital and Medical Center, LLC, Jan Sayoc, RN and Bozidar Knezevic, RN</i></p>
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HALL PRANGLE & SCHOONVELD, LLC
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SUITE 200
LAS VEGAS, NEVADA 89144
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

CERTIFICATE OF SERVICE

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I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 23rd day of September, 2019, I served a true and correct copy of the foregoing **JOINT PRETRIAL MEMORANDUM** via the E-Service Master List for the above referenced matter in the Eighth Judicial District Court e-filing System in accordance with the electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules to the following:

Carol F. Hay, Esq.
CAROL F. HAY, P.C.
4101 Meadows Lane, Suite 100
Las Vegas, NV 89107

-and-

Sean K. Claggett, Esq.
Jennifer Morales, Esq.
Samuel A. Harding, Esq.
CLAGGETT & SYKES
4101 Meadows Lane, Suite 100
Las Vegas, NV 89107
Attorneys for Plaintiffs

/s/ Kellie Gurule
An employee of HALL PRANGLE & SCHOONVELD, LLC