

<p style="text-align: right;">Page 1</p> <p>1 IN THE COURT OF COMMON PLEAS 2 OF SUMMIT COUNTY, OHIO 3 ----- 4 CHARLES G. PERE, et al., 5 Plaintiffs, 6 vs Case No. 03-07-3984 7 THE LEDGES OF ROCKYNOL, 8 et al., 9 Defendants. 10 11 ----- 12 DEPOSITION OF PATRICIA COFFMAN, L.P.N. 13 FRIDAY, NOVEMBER 14, 2003 14 ----- 15 Deposition of PATRICIA COFFMAN, L.P.N., a 16 Witness herein, called by counsel on behalf of 17 the Plaintiff for examination under the statute, 18 taken before me, Cynthia A. Sullivan, a 19 Registered Professional Reporter and Notary 20 Public in and for the State of Ohio, pursuant to 21 agreement of counsel, at the offices of Tipping 22 Co., L.P.A., 525 N. Cleveland-Massillon Road, 23 Akron, Ohio, commencing at 3:45 p.m. on the day 24 and date above set forth. 25 -----</p>	<p style="text-align: right;">Page 3</p> <p>1 PATRICIA COFFMAN, L.P.N., of lawful age, 2 called for examination, as provided by the Ohio 3 Rules of Civil Procedure, being by me first duly 4 sworn, as hereinafter certified, deposed and 5 said as follows: 6 EXAMINATION OF PATRICIA COFFMAN, L.P.N. 7 BY MS. TRESL: 8 Q. For the record, would you state your 9 name and address, please? 10 A. Patricia Coffman, 541 Edgewood 11 Avenue, Akron, Ohio, 44307. 12 Q. Is it okay if I call you Pat? 13 A. Sure. 14 Q. Please, feel free to call me Jackie. 15 A. Okay. 16 Q. You spell Coffman a little 17 differently? 18 A. Yes, than most people, 19 C-O-F-F-M-A-N. 20 Q. Have you ever had your deposition 21 taken before? 22 A. I think once. 23 Q. What was that situation? 24 A. It's been probably close to 30 years 25 ago, honey, at the hospital once, and I don't</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 On behalf of the Plaintiffs: 3 Becker & Mishkind, by 4 JACQUELINE D. TRESL, ESQ. 5 The Skylight Office Building 6 Suite 660 7 1220 W. 2nd Street 8 Cleveland, Ohio 44113 9 216-241-2600 10 11 On behalf of the Defendant Rockynol: 12 Tipping Co., L.P.A., by 13 ALISON M. BREAU, ESQ. 14 525 N. Cleveland-Massillon Road 15 Suite 207 16 Akron, Ohio 44333 17 330-670-8400 18 19 On behalf of the Defendant Dr. Amanambu: 20 Buckingham, Doolittle & Burroughs, by 21 BRENDA COEY, ESQ. 22 4518 Fulton Drive, NW 23 P. O. Box 35548 24 Canton, Ohio 44735 25 330-492-8717</p>	<p style="text-align: right;">Page 4</p> <p>1 even remember anything about what the case was 2 about or anything. 3 Q. It was a malpractice case? 4 A. It was something in regards to the 5 hospital, yeah. I used to work at St. Thomas 6 back in the '70s. 7 Q. Were you named a defendant or just 8 came in as a witness; do you recall? 9 A. I was like for the hospital because 10 I had taken care of the patient probably. 11 Q. Do you remember the name of the 12 case? 13 A. I don't. I don't remember it. 14 Q. Just assuming you don't remember 15 some of the basic guidelines, I'll review them 16 with you. I'm sure your attorney has discussed 17 it with you. 18 A. Right. 19 Q. If you don't understand my question, 20 I want you to stop and tell me that you don't 21 understand it; okay? 22 A. Sure. 23 Q. I need you to answer yes or no so 24 that Cynthia can put it down because uh-huhs and 25 uh-uhs are very hard for her to transcribe.</p>

<p style="text-align: right;">Page 5</p> <p>1 Don't nod or shake your head. Just say yes or 2 no. 3 A. Okay. 4 Q. If you can let me finish asking my 5 question before you answer, I would be grateful. 6 A. All right. 7 Q. I will give you the same courtesy, 8 hopefully, to let you try to answer before I 9 interject. Sometimes we'll probably talk over 10 one another, but if we try, we ought to be able 11 to make it pretty clear for the record. 12 A. Okay. 13 Q. Are you currently employed at 14 Rockynol? 15 A. Yes, I am. 16 Q. Tell me about how long you have been 17 there and what your job is. 18 A. I'm a licensed practical nurse, and 19 I'm a charge nurse for either the first floor or 20 second floor. I've been there for seven years. 21 Our duties are, you know, to give out 22 assignments to the nurse assistants every 23 morning and pass out the medications prescribed 24 by the doctors for that shift and do any 25 treatments that are ordered for the residents.</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. When did you get that? 2 A. That was incorporated in our school 3 of nursing. I don't think it was like a 4 separate course back when I was in school, but 5 they -- you know, it was like they said it was 6 incorporated in our nursing program. 7 Q. You're able to give medications then 8 at Rockynol? 9 A. Yes. 10 Q. Are you able to give injections, 11 also? 12 A. Yes. 13 Q. At the time that Mr. Pere was at 14 Rockynol, which shift did you work primarily, or 15 did you work lots of shifts? 16 A. I used to work over, but I was 17 working day shift that day. 18 Q. So you came on in the morning? 19 A. Yes. I came on at 7:00 a.m., 20 uh-huh. 21 Q. Typically, what did you work? What 22 were your normal shifts, 7:00 to 3:00? 23 A. 7:00 to 3:00 I'm on now. That was 24 the shift I was on then. 25 Q. Full time?</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. Where did you get your LPN at? 2 A. Akron School of Practical Nursing. 3 Q. What year did you do that? 4 A. In 1972 I graduated. 5 Q. Have you taken any additional 6 courses, anything specific to geriatric nursing? 7 A. I've taken CEUs in regards to the 8 elderly. In fact, my last CEU was in care of 9 the elderly. 10 Q. Is that what it was called? 11 A. I don't know if that was the exact 12 words, but it was in regards to geriatric 13 nursing. 14 Q. Are you BLS certified, basic life 15 support certified? 16 A. Yes, I am. 17 Q. Are you ACLS certified? 18 A. Which is? 19 Q. Advanced cardiac life support. 20 A. That is for the CPR? I'm certified 21 for CPR. 22 Q. Did you have the additional training 23 that LPNs get so they are able to pass out 24 medications? 25 A. Yes, I did.</p>	<p style="text-align: right;">Page 8</p> <p>1 A. Yes. 2 Q. Were you assigned to his floor, 3 which I assume was the first floor, since you 4 said you rotated between the first and second? 5 A. Yes, I was. 6 Q. What did you review for today's 7 deposition? 8 A. We reviewed, you know, how long he 9 had been at the nursing home and, you know, his 10 care so far. 11 MS. BREAUX: Pat, just tell her what 12 you reviewed. Don't talk about anything that we 13 talked about. 14 A. Reviewed, what do you mean? Like 15 before I would give him his care, you mean? 16 MS. BREAUX: Documents. 17 A. You mean the nurse's notes like 18 before I came in here? Yes, just reviewed the 19 nurse's notes. 20 Q. Did you review his whole chart or 21 just the nurse's notes? 22 A. Just the nurse's notes. 23 Q. Did you review anything else for 24 today's deposition? 25 A. No.</p>

<p style="text-align: right;">Page 9</p> <p>1 Q. Did you look at any policies or 2 procedure manuals from Rockynol? 3 A. No. 4 Q. Did you do any independent medical 5 research for today's deposition? 6 A. No. 7 Q. Do you remember Mr. Pere apart from 8 the medical records that you reviewed today? 9 A. Yes, I do. 10 Q. What do you remember about Mr. Pere? 11 A. That he was a new patient, and he 12 was -- I remember him being a tall gentleman and 13 that he was getting therapy. He was alert and 14 oriented. Then I can't remember much else about 15 him. 16 Q. So when I ask you about Mr. Pere, 17 some of the things that you tell me may be an 18 independent memory apart from what you reviewed 19 in the nurse's notes for the deposition? 20 A. Yes. 21 Q. Did you care for Mr. Pere at all 22 from the 29th to the time that he died? 23 A. I really can't remember that. I 24 know I did that morning, you know, when we found 25 him.</p>	<p style="text-align: right;">Page 11</p> <p>1 were doing for him? 2 A. Yes. 3 Q. Did he call you by name? Did he 4 know who you were? 5 A. I don't think he knew my name. 6 Q. Was Mr. Cailer his roommate at that 7 time when you were passing the medications? 8 A. Yes. 9 Q. Do you remember anything specific 10 about Mr. Cailer? 11 A. Yeah. I remember Mr. Cailer because 12 he used to be up walking around in the hallways, 13 and he had been there quite longer than the 14 other guy. Mr. Cailer would get mixed up to, 15 you know, the time of day and stuff like that. 16 Q. You never knew that to happen with 17 Mr. Pere? 18 A. No, I didn't. 19 Q. But you only cared for him that one 20 time when you may have passed medications to 21 him? 22 A. Yes. 23 Q. But you are fairly certain that you 24 did pass medications to him? 25 A. Yeah. I think I had him one other</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. Prior to that morning, do you recall 2 having any interactions with him? 3 A. I think I did one other day. 4 Q. Would that be that you cared for 5 him, or you just stopped by his room to talk to 6 him, for example? 7 A. I think I passed medication to him 8 one day. 9 Q. What do you remember, if anything, 10 about the day you passed medication to him? 11 A. He took his medication without 12 problems, and he didn't have any complaints or 13 anything. 14 Q. Do you recall if he was up moving 15 around in the room when you gave him the 16 medication, or was he sitting in the chair in 17 his bed? 18 A. He was sitting at the side of his 19 bed. 20 Q. Do you recall seeing him up at any 21 time other than just when you passed the 22 medication to him? 23 A. I really don't recall. 24 Q. As far as you can remember, he was 25 alert and aware of his surroundings and what you</p>	<p style="text-align: right;">Page 12</p> <p>1 day than the day we found him. 2 Q. Let's talk about the day that you 3 found him. You came on at 7:00; would that be 4 correct? 5 A. Right. 6 Q. Tell me what happened in terms of 7 what you did leading up to the time when you 8 found him. Let's just get to where you actually 9 find him. 10 A. When we come on, we get report from 11 the off-going nurse to see what's going on, and 12 then I get my cart ready to head down the hall 13 to start passing medication, and I was just -- 14 really, his room was one of the first rooms when 15 you come down the one hall, and I just had my 16 cart there across from his room, and his 17 roommate came out and told me that he fell. I 18 looked in there, and I could see him on the 19 floor with the blood by his head. 20 Q. So you're pushing your cart? 21 A. Yes. 22 Q. And the roommate comes out to you? 23 A. Uh-huh. 24 Q. And you're right by the doorway? 25 A. No. I'm across. Like, there's</p>

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1 rooms on one side and rooms on the other, and I
2 was on the opposite side with my cart.
3 Q. Could you see in there?
4 A. I could look in the room when he
5 told me, yes.
6 Q. Tell me, you're standing there with
7 your cart, and Mr. Caller, tell me exactly what
8 he said that you remember.
9 A. He came out and told me that his
10 roommate had fallen.
11 Q. Then what happened?
12 A. Well, I could see him on the floor,
13 so I went in right away and, you know, I just --
14 I could see him. He was just doing like real
15 shallow breathing like gasping for air. I
16 couldn't feel no pulse. I just hollered for
17 help, I need help in here right away, because
18 they were in -- I just hollered. I stayed in
19 the room and hollered that I needed some help.
20 I know the supervisor was getting
21 report in the china room which is not too far
22 from there, and I was hoping that somebody would
23 hear me, and they came right away.
24 Q. Describe to me when you saw Mr. Pere
25 and when you went in and checked his pulse.

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1 Paint a picture for me of what you saw.
2 A. He was laying on the floor with his
3 head to the -- laying on his left side, and his
4 arms were beside him down, and he just was
5 passed -- I could see he was passed out.
6 Q. What was his color?
7 A. Unconscious.
8 Q. Do you remember his color?
9 A. I don't really remember the color.
10 Q. Tell me about the blood. Was there
11 a lot of blood or a small amount of blood?
12 A. It was a fair amount. I wouldn't
13 say a large amount but a fair amount which isn't
14 too unnormal from a head injury, but there was a
15 fair amount. Like, there was a pool around his
16 head.
17 Q. About how wide would you say the
18 pool was around his head?
19 A. I don't know how to compare it.
20 Q. The size of a pie? The size of a
21 car tire?
22 A. Probably like his head is there, but
23 it was around the side of his head more like --
24 I don't know how to describe it.
25 MS. BREAUX: Can you give an

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1 estimate of a measurement?
2 Q. On the record, she can't write down
3 what your hand is doing on the table, so if you
4 can just give us a little visual.
5 A. It was probably about -- I'd say the
6 blood probably went out about maybe 8 inches or
7 about 8 or 9 inches out around his head all
8 surrounding his head.
9 Q. There was a bit of a pooling? I
10 mean, it was more than just brushed across the
11 surface? There was actually a little bit of
12 blood there?
13 A. Oh, I don't remember that.
14 Q. So you came up to him, and when you
15 say you checked his pulse, was that the carotid?
16 A. I checked the radial, uh-huh.
17 Q. Did you feel it?
18 A. I couldn't feel no pulse.
19 Q. Did you check any other place for a
20 pulse, or did you just call for help?
21 A. I just called for help because he
22 was having really shallow, effused like
23 respirations, real shallow.
24 Q. Did you try to arouse him at all?
25 A. Yes.

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1 Q. He would not arouse?
2 A. No.
3 Q. Then what happened when the help
4 came in?
5 A. When they came in, then the
6 supervisor, you know, she -- he had stopped
7 breathing now. She went to go see if he was a
8 DNR or comfort care, you know, and he was a DNR.
9 He had stopped breathing at that time when she
10 got in there, and she checked for a carotid
11 pulse, and there was none. He was getting
12 cyanotic then, so his color was --
13 Q. How long did it take for her to go
14 check his DNR order and come back?
15 A. There was two nurses. One went out
16 to check while the other one was in there with
17 me. I don't know which one it was, whether it
18 was Kim.
19 Q. So they came in, he was getting
20 cyanotic, and then what happened?
21 A. They told us not to -- he was gone,
22 they knew he was gone, and they said not to move
23 him or anything.
24 Q. So what did you do?
25 A. I just, you know, I left the room

<p style="text-align: right;">Page 17</p> <p>1 then. 2 Q. Then what happened after that that 3 you remember observing? 4 A. I really don't remember. I started 5 on my work then. 6 Q. Were you shook up at all? 7 A. Yes. 8 Q. Tell me how you felt after that. 9 A. I just felt bad. It was just kind 10 of a shocking situation to see. 11 Q. Did you talk to any of your fellow 12 workers about what had happened? 13 A. Other than -- not really, just to 14 the supervisor, you know, to tell her how I seen 15 him and everything on the floor. 16 Q. What did she say when you told her 17 that? 18 MS. BREAUX: Objection. Pat, you 19 can answer. You can go ahead and answer. 20 A. Could you repeat that? 21 Q. What did she say when you told her 22 those things, what you had observed? What did 23 she say back to you? 24 A. I really don't remember. 25 Q. Later on after that, did you talk to</p>	<p style="text-align: right;">Page 19</p> <p>1 understand the question exactly. 2 Q. What I want to know is when 3 something like this happens, people talk about 4 it because it's very significant. What I'm 5 wondering is what kinds of things you talked 6 about to understand it and explain it, how he 7 was laying at the foot of his bed? 8 A. They were trying to figure out if he 9 had tried to catch himself in a fall or if, you 10 know, exactly what had happened that made him be 11 on the floor like that because apparently it 12 didn't look like he had tried to catch himself 13 from falling or anything. Stuff like that we 14 were talking about like after it happened. 15 Q. What other possibilities did you 16 talk about other than that in terms of not 17 catching himself? 18 A. I really don't remember anything 19 else, you know. Knowing that, we were just 20 curious as to what the autopsy report would 21 show. 22 Q. Did you find out what the autopsy 23 showed? 24 A. Not until the other day. 25 Q. What did you think when you heard</p>
<p style="text-align: right;">Page 18</p> <p>1 your fellow workers about what had happened? 2 A. No. 3 Q. Why would you not have talked to 4 your fellow workers about that? 5 A. I was busy doing my work. 6 Q. Did you take a lunch that day? 7 A. I probably did. 8 Q. Do you typically go by yourself for 9 lunch? 10 A. Yes. 11 Q. So you wouldn't have had a chance to 12 talk about it then? 13 A. Right. 14 Q. Is there any point that you talked 15 to your coworkers about what had happened to 16 Mr. Pere? 17 A. Yeah. We've talked about it like 18 getting ready today and everything. 19 Q. Other than today with your attorney, 20 what have you talked to your colleagues, your 21 coworkers, about it? When you talked about 22 Mr. Pere, what did you talk about? 23 A. I really don't remember the exact. 24 You know, we would just say, you know -- I 25 really don't remember exactly. I don't really</p>	<p style="text-align: right;">Page 20</p> <p>1 about what the autopsy showed? 2 MS. BREAUX: Objection. This was a 3 discussion that we had with counsel. 4 Q. Well, if I told you that the autopsy 5 showed that his back was broken, would that 6 surprise you? Was that a yes or no or I don't 7 know? 8 A. Would that surprise me? At that 9 time I didn't really know. 10 Q. Did you come to any sort of 11 understanding with your colleagues about what 12 had happened that day, or was it always just a 13 mystery to you until you met with counsel last 14 week, Monday or whatever day? 15 A. You know, it was never definite, 16 what had happened, but we did talk about it 17 because, you know, because it doesn't happen 18 every day. But I don't know if I'm answering 19 that right or not. 20 Q. Can you be more specific, is what 21 I'm trying to determine, with what you talked 22 about because it doesn't happen every day? 23 A. Well, just that we were just trying 24 to piece the pieces together, you know, because 25 -- I don't exactly know how to say it.</p>

<p style="text-align: right;">Page 21</p> <p>1 Q. Well, try. Just do your best.</p> <p>2 A. Okay. Just what I had said about we</p> <p>3 were trying to figure out, you know, how exactly</p> <p>4 he fell, you know, if he slipped on something or</p> <p>5 what. But from the way when the supervisor was</p> <p>6 in there, she said that there was nothing that</p> <p>7 he -- it didn't look like there had been any --</p> <p>8 I guess, they had some BM on the floor, and</p> <p>9 there were no skid marks in the BM. It was just</p> <p>10 like it was smashed down, so he didn't</p> <p>11 apparently trip on anything like that. Just</p> <p>12 that we felt that he had passed out, and that's</p> <p>13 what made him fall. Just that was our</p> <p>14 conclusion from what we had seen there in the</p> <p>15 room.</p> <p>16 MS. BREAUX: Objection.</p> <p>17 Q. When you say BM, you said a small</p> <p>18 amount?</p> <p>19 A. Yes.</p> <p>20 Q. Was it formed, or was it diarrhea?</p> <p>21 A. They said it looked like it was</p> <p>22 smashed down.</p> <p>23 Q. So it was hard to tell?</p> <p>24 A. Uh-huh.</p> <p>25 Q. He was on top of it; is that what</p>	<p style="text-align: right;">Page 23</p> <p>1 side of the bed is when he may have gone down?</p> <p>2 I'm just trying to understand. If</p> <p>3 the BM is down at the foot and he's found at the</p> <p>4 side of the bed, how did the BM get there do you</p> <p>5 imagine?</p> <p>6 I understand you're just guessing</p> <p>7 from what you saw.</p> <p>8 A. Yes. Well, I don't remember seeing</p> <p>9 the BM.</p> <p>10 Q. I see. That's just from what you</p> <p>11 heard?</p> <p>12 A. Yeah.</p> <p>13 Q. But you know it was at the foot of</p> <p>14 the bed from what you heard?</p> <p>15 A. I just know there was BM in the</p> <p>16 room. I don't remember seeing it myself.</p> <p>17 Q. Have you talked to anybody else</p> <p>18 since this in terms of his family, Dr. Amanambu,</p> <p>19 or anyone other than who we've already talked</p> <p>20 about? Did you talk to Mrs. Pere after this</p> <p>21 happened?</p> <p>22 A. No.</p> <p>23 Q. Do you remember seeing Mrs. Pere</p> <p>24 after this happened?</p> <p>25 A. I never met her.</p>
<p style="text-align: right;">Page 22</p> <p>1 happened?</p> <p>2 A. No. It was down at the foot of the</p> <p>3 bed.</p> <p>4 Q. He was at the head of the bed or</p> <p>5 foot of the bed?</p> <p>6 A. No. He was almost -- like the bed</p> <p>7 is here (indicating), and he was like next to</p> <p>8 the bed in front of the bed, maybe not exactly</p> <p>9 straight across, but kind of perpendicular to</p> <p>10 the bed.</p> <p>11 Q. So how would the BM then get at the</p> <p>12 foot of the bed, do you imagine, just looking at</p> <p>13 what happened?</p> <p>14 A. This is -- we thought he was getting</p> <p>15 up to go to the bathroom and didn't make it.</p> <p>16 MS. BREAUX: Objection.</p> <p>17 Q. How did the BM get to the foot of</p> <p>18 the bed then? Did he climb over?</p> <p>19 A. I think he was getting up. We</p> <p>20 really don't know for sure.</p> <p>21 Q. Right.</p> <p>22 A. I think he was probably getting up</p> <p>23 because he had to go to the bathroom.</p> <p>24 Q. Then he moved his bowels at the end</p> <p>25 of the bed, and then as he was moving to the</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Is there anywhere in the medical</p> <p>2 records where you charted?</p> <p>3 A. No.</p> <p>4 Q. So your name does not appear here?</p> <p>5 A. No.</p> <p>6 Q. Is there anywhere that you were</p> <p>7 asked to document what you saw for Rockynol</p> <p>8 Retirement Center?</p> <p>9 A. No.</p> <p>10 MS. TRESL: I think I may be done.</p> <p>11 Let me just look quickly, and then Brenda may</p> <p>12 have a question.</p> <p>13 Q. One quick question. In terms of</p> <p>14 looking at him when he was on the floor, were</p> <p>15 his head and his neck and his shoulders pretty</p> <p>16 much in alignment, or were things twisted?</p> <p>17 A. He was laying on his left side. I</p> <p>18 don't remember him being twisted other than, you</p> <p>19 know, being on his side.</p> <p>20 Q. So he looked just as if he had</p> <p>21 fallen on his side?</p> <p>22 A. Yes.</p> <p>23 Q. He was pretty much in alignment?</p> <p>24 A. Yes.</p> <p>25 MS. TRESL: No further questions.</p>

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<p>1 We'll see if Brenda has any.</p> <p>2 EXAMINATION OF PATRICIA COFFMAN, L.P.N.</p> <p>3 BY MS. COEY:</p> <p>4 Q. You may have answered this, but I</p> <p>5 want to check. I'm not sure. On the day of</p> <p>6 this incident, did you talk with Dr. Amanambu</p> <p>7 about Mr. Pere at all?</p> <p>8 A. No.</p> <p>9 Q. You had no conversations with</p> <p>10 Dr. Amanambu?</p> <p>11 A. No, I didn't.</p> <p>12 MS. COEY: That's all I have.</p> <p>13 MS. TRESL: Thank you very much.</p> <p>14 You did a lovely job.</p> <p>15 MS. BREAU: We'll read.</p> <p>16 -----</p> <p>17 (Deposition concluded at 4:05 p.m.)</p> <p>18 (Signature not waived.)</p> <p>19 -----</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 CERTIFICATE</p> <p>2</p> <p>3 State of Ohio,)</p> <p>4) SS:</p> <p>5 County of Cuyahoga.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9 I, Cynthia A. Sullivan, a Notary Public</p> <p>10 within and for the State of Ohio, duly</p> <p>11 commissioned and qualified, do hereby certify</p> <p>12 that the within named PATRICIA COFFMAN, L.P.N.,</p> <p>13 was by me first duly sworn to testify to the</p> <p>14 truth, the whole truth and nothing but the truth</p> <p>15 in the cause aforesaid; that the testimony as</p> <p>16 above set forth was by me reduced to stenotypy,</p> <p>17 afterwards transcribed, and that the foregoing</p> <p>18 is a true and correct transcription of the</p> <p>19 testimony.</p> <p>20 I do further certify that this deposition</p> <p>21 was taken at the time and place specified and</p> <p>22 was completed without adjournment; that I am not</p> <p>23 a relative or attorney for either party or</p> <p>24 otherwise interested in the event of this</p> <p>25 action. I am not, nor is the court reporting</p> <p>firm with which I am affiliated, under a</p> <p>contract as defined in Civil Rule 28(D).</p> <p>IN WITNESS WHEREOF, I have hereunto set my</p> <p>hand and affixed my seal of office at Cleveland,</p> <p>Ohio, on this 24th day of November 2003.</p> <p><i>Cynthia A. Sullivan</i></p> <p>Cynthia A. Sullivan, Notary Public</p> <p>Within and for the State of Ohio</p> <p>My commission expires October 6, 2006.</p>
<p>1 AFFIDAVIT</p> <p>2 I have read the foregoing transcript from</p> <p>3 page 1 through 25 and note the following</p> <p>4 corrections:</p> <p>5 PAGE LINE REQUESTED CHANGE</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18 PATRICIA COFFMAN, L.P.N.</p> <p>19</p> <p>20 Subscribed and sworn to before me this</p> <p>21 _____ day of _____, 2003.</p> <p>22</p> <p>23</p> <p>24 _____</p> <p>25 Notary Public</p> <p>My commission expires _____.</p>	<p>1 INDEX</p> <p>2 DEPOSITION OF PATRICIA COFFMAN, L.P.N.</p> <p>3</p> <p>4 BY MS. TRESL:..... 3:7</p> <p>5 BY MS. COEY:..... 25:3</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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