THE HALLEY ORTHOPAEDIC CLINIC

DAVID K. HALLEY, MD., & ASSOCIATES, INC. 4560 North High Street · Columbus, Ohio 43214 614/262-1288 · 1 - 8 0 / 323-6945

DAVID K. HALLEY, M.D.. F.A.C.S, MEMBER CHARNLEY LOW FRICTION SOCIETY TOTAL HIP AND TOTAL KNEE REPLACEMENT SURGERY

13 July **1992**

Ms. Susan Reinker Attorney at Law 1001 Lakeside Avenue, Suite 1600 Cleveland, Ohio 44114-1192

> RE: Geraldine Zurawski, et al. v. Kingsbury G. Heiple, M.D.

Dear Ms. Reinker,

I have had the opportunity of reviewing the records of Geraldine Zurawski, et al vs. Kingsbury G. Heiple, M.D.

Sciatic nerve complication following total hip arthroplasty is very rare, with an incidence of approximately 0.6 %. Female patients, particularly those with congenital hip dislocation, appear to have a higher risk of sustaining nerve injury, Mechanisms of nerve injury include lengthening or lateral displacement of the proximal femur, subfascial hematoma formation, prosthetic dislocation and partial nerve transection. In many instances, the etiology of the nerve injury is unknown.

I reviewed the operative note in the case involved and there was no indication of nerve injury at the time of the surgical procedure, Review of the record would suggest that no untold incident occurred, There appeared to be no particular difficulty in the technique of the procedure.

However, in recovery room, it was noted that the patient did have evidence of a nerve injury and the patient was returned to surgery immediately, at which time partial transection of the sciatic nerve was identified, This was repaired surgically.

The exact etiology of this partial transection is not known for certain. It is presumed that it occurred as a result of some type of retractor.

Although this is an unfortunate complication for the patient, I am unable to identify improper surgical act that would constitute malpractice. Indeed, it is fortunate for the patient that the 13 July 1992 Page II

injury was identified early and she was returned to the operating room for surgical intervention.

Patients with incomplete neurological recovery at follow-up examination (one year or later) function at or near levels of individuals who have had no sciatic nerve damage.

Even though this patient did experience a complication at time of her surgery, such injuries can occur in the best of hands whatever precaution is taken. This certainly does not indicate that there is any inappropriate care.

Should you have any further questions, please do not hesitate to contact me. I hope this information is informative.

Yours sincerely,

David K. Halley, M.D., F.A.C.S.

DKH/pa

DAVID K. HALLEY, M.D. , F.A.C.S.

BIRTH DATE: JULY 14, 1941

EDUCATION:

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OHIO STATE UNIVERSITY OHIO STATE UNIVERSITY GOOD SAMARITAN HOSPITAL (PHOENIX, ARIZONA)	(INTERN)	1963 1967 1967-68	B.S. M.D.
RIVERSIDE METHODIST HOSPITAL (OHIO STATE UNIVERSITY)	(RESIDENT)	1968-72	
LOCKBOURNE AIR FORCE BASE		1972-74	
WRIGHTINGTON HOSPITAL UNDER SIR JOH (FELLOW, CENTRE FOR HIP SURGER	N CHARNELY Y, WIGAN, ENGLA	1974-75 AND)	

PROFESSIONAL SOCIETIES:

DIPLOMAT - AMERICAN BOARD OF ORTHOPAEDIC SURGERY AMERICAN MEDICAL ASSOCIATION OHIO STATE MEDICAL SOCIETY COLUMBUS ORTHOPAEDIC SOCIETY COLUMBUS ACADEMY OF MEDICINE CHARNLEY LOW FRICTION SOCIETY IN HIP SURGERY PAN-SURGICAL SOCIETY TRI-STATE SURGICAL SOCIETY AMERICAN COLLEGE OF SURGEONS THE CLINICAL ORTHOPAEDIC SOCIETY ASSOCIATION OF BONE AND JOINE SURGEONS

COMMITTEES:

THE SIR JOHN CHARNLEY FUND - AMERICAN COMMITTEE THE CHARNLEY ADVISORY GROUP -THACKRAY ARTHRITIS FOUNDATION - BOARD OF DIRECTORS

PUBLICATIONS:

- 1. MALLORY, T.H.; HALLEY, D.K.: POSTERIOR BUTTOCK PAIN FOLLOWING TOTAL HIP REPLACEMENT. CLIN. ORTHOP., 90: 104-106.
- 2. HALLEY, D.K.; EYRING, E.J.: CLINICAL ELEVATION OF THE SCAPULA IN A FAMILY. CLIN. ORTHOP., 97:31-33.
- 3. HALLEY, D.K.; OLIX, M.L.: REVIEW OF THE BRISTOW OPERATION FOR RECURRENT ANTERIOR SHOULDER DISLOCATION IN ATHLETES. CLIN. ORTHOP., 106: 175-179,1974.
- 4. HALLEY, D.K.: SLIPPED FEMORAL CAPITAL EPIPHYSIS. OHIO STATE MEDICAL JOURNAL, OCTOBER, 1974.

- 5. HALLEY, D.K.; CHARNLEY, J.: THE RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER. CLIN. ORTHOP., 112:180-192, 1975.
- 6. CHARNLEY, J; HALLEY, D.: LONG-TERM WEAR IN TOTAL HIP REPLACEMENT. CLIN. ORTHOP., 112-170-180, 1975.
- 7. CHARNLEY, J.; HALLEY, D.K.: RATE OF WEAR IN TOTAL HIP REPLACEMENT. ORTHO. DIGEST, DECEMBER, 1976.
- 8. CHARMLEY, J., HALLEY, D.K.: THE RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER. ORTHOP. DIGEST, 1976.
- 9. HALLEY, D.K.: AN INTRODUCTION TO THE SHEEHAN TOTAL KNEE ARTHROPLASTY. OHIO STATE MEDICAL JOURNAL, 72:8, AUGUST, 1976.
- 10. HALLEY, D. AND WROBLEWSKI, B.M.: LONG-TERM RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER. CLIN. ORTHOP. 211:43-50, OCT. 1986.
- 11. CALLIHAN, S.; HALLEY, D.K.: PROSPECTIVE ANALYSIS OF SHEEHAN TOTAL KNEE ARTHROPLASTY. CLIN. ORTHOP., JAN-FEB., 192:124-131, 1985.
- 12. DENNIS, D.A.; HALLEY, D.K.: USE OF THE CHARNLEY MINI-OFFSET BORE ACETABULAR COMPONENT IN SEVERE ACETABULAR DYSPLASIA: A PRELIMINARY REPORT. CLIN. ORTHOP., OCT., 211-140:147, 1986.

PRESENTATIONS:

- 1. RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OLD OR YOUNGER; CAPETOWN, SOUTH AFRICA, 1975.
- 2. RATE OF WEAR IN TOTAL HIP REPLACEMENT; MIAMI BEACH, FLORIDA. SPONSORED BY THE AMERICAN ACADEMEY OF ORTHOPAEDIC SURGEONS, 1975.
- 3. RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER; MIAMI BEACH, FLORIDA. SPONSORED BY THE AMERICAN ACADEMY OF ORTHOPAEDIC SURGEONS, 1975.
- 4. RESULTS OF LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER; LAS VEGAS, NEVADA SPONSORED BY THE AMERICAN ACADEMY OF ORTHOPAEDIC SURGEONS, 1977.
- 5. AN INTRODUCTION TO THE SHEEHAN TOTAL KNEE ARTHROPLASTY (MOVIE); KYOTO, JAPAN. SPONSORED BY SICOT, 1978.
- 6. AN INTRODUCTION TO THE SHEEHAN TOTAL KNEE ARTHROPLASTY (MOVIE); LAS VEGAS, NEVADA. SPONSORED BY THE AMERICAN ACADEMY OF ORTHOPAEDIC SURGEONS, 1977.

- REVISION TECHNIQUES IN TOTAL HIP REPLACEMENT; COLUMBUS, OHIO. SPONSORED BY THE TRI-STATE ORTHOPAEDIC SOCIETY, 1978.
- 8. REVISION TECHNIQUES IN TOTAL HIP REPLACEMENT; SNOWMASS, COLORADO. SPONSORED BY THE OHIO STATE UNIVERSITY DIVISION OF ORTHOPAEDICS, 1981.
- 9. REVISION TECHNIQUES IN TOTAL HIP REPLACEMENT; COLUMBUS, OHIO. SPONSORED BY THE OHIO OSTEOPATHIC ASSOCIATION, 1982.
- 10. RESULTS OF LOW FRICTION ARTHROPLASTY IN THIRTY YEARS OF AGE OR YOUNGER; CINCINNATI, OHIO. SPONSORED BY THE OHIO ORTHOPAEDIC SOCIETY. 1984.
- 11. LOW FRICTION ARTHROPLASTY IN PATIENTS THIRTY YEARS OF AGE OR YOUNGER IN CHARNLEY LOW FRICTION ARTHROPLASTIES OF THE HIP: A SIX TO EIGHT YEAR RADIOGRAHIC FOLLOW-UP WITH IMPROVED SURGICAL TECHNIQUES. COLUMBUS, OHIO. SPONSORED BY OHIO RHEUMATISM SOCIETY, **1984.**
- 12. TOTAL HIP REPLACEMENT, 1987, TECHNIQUE AND TECHNOLOGY; NEW YORK, NEW YORK. SPONSORED BY MOUNT SINAI SCHOOL OF MEDICINE, 1987.
- 13. WHAT'S NEW IN TOTAL HIP AND TOTAL KNEE REPLACEMENT; KENTON, OHIO. SPONSORED BY 'RIVERSIDEMETHODIST HOSPITAL, 1987.
- 14. CLINICAL EXPERIENCE WITH THE PRECISION HIP SYSTEM, CINCINNATI, OHIO. SPONSORED BY THE UNIVERSITY ORTHOPAEDIC DEVELOPMENT FOUNDATION, 1987.
- 15. CLINICAL EXPERIENCE PRECISION TOTAL HIP REPLACEMENT; BLAINE, WASHINGTON. SPONSORED BY UNIVERSITY OF WASHINGTON, 1987.
- 16. CLINICAL EXPERIENCE PRECISION TOTAL HIP REPLACEMENT; TARPON SPRINGS, FLORIDA. SPONSORED BY UNIVERSITY OF SOUTH FLORIDA COLLEGE OF MEDICINE, 1987.
- 17. CLINICAL EXPERIENCE PRECISION TOTAL HIP REPLACEMENT; SPONSORED BY HOWMEDICA, PENNSYLVANIA, 1988.
- 18. CLINICAL EXPERIENCE WITH POSTERIOR STABILIZED KNEE ARTHRO-PLASTY; SPONSORED BY ZIMMER, INC., OHIO, 1988.
- 19. MANAGEMENT OF INFECTED TOTAL KNEE ARTHROPLASTY SPONSORED BY ZIMMER, INC., OHIO, 1988.

EXHIBITS:

1. CLEAN AIR IN TOTAL HIP REPLACEMENT. THE OHIO STATE MEDICAL ASSOCIATION. COLUMBUS, OHIO **1975.**

- 2. THE USE OF RADIOGRAPHIC TEMPLATES IN TOTAL HIP REPLACEMENT. AMERICAN ACADEMY OF ORTHOPAEDIC SURGEONS, NEW ORLEANS 1976.
- 3. LONG-TERM WEAR IN TOTAL HIP REPLACEMENT. THE OHIO STATE MEDICAL ASSOCIATION, CINCINNATI, OHIO 1976.
- 4. THE CONSERVATIVE APPROACH IN TOTAL HIP REPLACEMENT. THE OHIO STATE MEDICAL ASSOCIATION, CINCINNATI, OHIO 1976.
- 5. AN INTRODUCTION TO THE SHEEHAN KNEE ARTHROPLASTY. AMERICAN ACADEMY OF ORTHOPAEDIC SURGEONS, LAS VEGAS, NEVADA, 1977.
- 6. BILATERAL SIMULTANEOUS TOTAL KNEE REPLACEMENTS. THE OHIO STATE MEDICAL ASSOCIATION, COLUMBUS, OHIO, 1978 AND 1979.

MEETINGS ATTENDED.

- 1. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, LAS VEGAS, 1973.
- 2. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, SAN FRANCISCO, 1975.
- 3. LOW FRICTION SOCIETY, ENGLAND, 1975.
- 4. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, NEW ORLEANS, 1976.
- 5. LOW FRICTION SOCIETY, ENGLAND, 1976.
- 6. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, LAS VEGAS, 1977.
- 7. LOW FRICTION SOCIETY, ENGLAND, 1977.
- 8. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, DALLAS, 1978.
- 9. LOW FRICTION SOCIETY, ENGLAND, 1978.
- 10. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, SAN FRANCISCO, 1979.
- 11. LOW FRICTION SOCIETY, ENGLAND, 1979.
- 12. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, ATLANTA, 1980.
- 13. LOW FRICTION SOCIETY, ENGLAND, 1980.
- 14. PAN-PACIFIC SURGICAL ASSOCIATION, HONOLULU, HAWAII, 1980.
- 15. TRI-STATE ORTHOPAEDIC SOCIETY, COLUMBUS, OHIO 1980.
- 16. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, LAS VEGAS, 1981.
- 17. LOW FRICTION SOCIETY, ENGLAND, 1981.
- 18. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, NEW ORLEANS, 1982.
- 19. LOW FRICTION SOCIETY, ENGLAND, 1982.
- 20. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, SAN FRANCISCO, 1983.
- 21. LOW FRICTION SOCIETY, ENGLAND, 1984.
- 22. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, ATLANTA, 1984.
- 23. LOW FRICTION SOCIETY, ENGLAND, 1984.
- 24. OHIO RHEUMATISM SOCIETY MEETING, COLUMBUS, 1984.
- 25. SICOT MEETING, LONDON, ENGLAND, 1984.
- 26. FLORIDA ORTHOPAEDIC SOCIETY MEETING, FLORIDA, 1984.
- 27. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, LAS VEGAS, 1985.
- 28. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, NEW ORLEANS, 1986.
- 29. LOW FRICTION SOCIETY MEETING, ENGLAND, 1986.
- 30. ORTHOPAEDIC ASSOCIATION ENGLISH-SPEAKING WORLD 8TH COMBINED ORTHOPAEDIC MEETING, WASHINGTON, D.C., 1987.
- 31. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, SAN FRANCISCO, 1987.
- 32. THACKRAY MEETING, BOSTON, 1987.
- 35. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, ATLANTA, 1988.

- 36. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, LAS VEGAS, 1989.
- 37. LOW FRICTION SOCIETY MEETING, ENGLAND, 1989.
- 38. MEDICAL SEMINAR, ISTANBUL, GREECE, 1989
- 39. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, NEW ORLEANS, 1990.
- 40. CLINICAL ORTHOPAEDIC SOCIETY MEETING, HOUSTON, TEXAS, 1990
- 41. SICOT MEETING, MONTREAL CANADA, 1990.
- 42. ASSOCIATION OF BONE AND JOINT SURGEONS, HAWAII, 1990.
- 43. AMERICAN ACADEMY OF ORTHOPAEDIC SURGERY, ANAHEIM, CA., 1991.
- 44. ASSOCIATION BONE AND JOINT SURGERY, DUCK'S KEY, FLA., 1991.
- 45. CPT HIP MEETING, COLUMBUS, OHIO, 1991.

CONTINUING MEDICAL EDUCATION:

- 1. NEW DEVELOPMENT IN TOTAL KNEE REPLACEMENT SESSION, ROCHESTER, NEW YORK, 1977.
- 2. RECENT DEVELOPMENTS IN JOINT REPLACEMENT, FLORIDA, 1977.
- 3. TRI-STATE ORTHOPAEDIC MEETING, WILLIAMSBURG, 1977.
- 4. CURRENT CONCEPTS IN JOINT REPLACEMENT, CALIFORNIA, 1977.
- 5. ARTHROSCOPIC SEMINAR, MICHIGAN, 1979.
- 6. JOINT REPLACEMENT OF THE HIP, NEW YORK, 1980.
- 7. COURSE ON HIP SURGERY, OHIO STATE UNIVERSITY, OHIO, 1980.
- 8. AOA INTERNATIONAL SYMPOSIUM, MASSACHUSETTS, 1981.
- 9. INFECTIOUS DISEASE, UNIVERSITY OF MICHIGAN, 1982.
- 10. MANAGEMENT OF CARDIOVASCULAR DISEASE, HAWAII, 1983.
- 11. JOINT CONFERENCE ON ORTHOPAEDICS, RUSSIA/CHINA, 1984.
- 12. TOTAL HIP ARTHROPLASTY THE TOTAL SYSTEM: CONCEPT AND INTENSE BIOSKILLS WORKSHOP, MASSACHUSETTS, 1984.
- 13. KNEE REPLACEMENT SURGERY, NEW YORK, 1984.
- 14. POROUS COATED TOTAL HIP REPLACEMENT, FLORIDA 1985.
- 15. PRECISION HIP MEETING, FLORIDA 1985.
- 16. TOTAL HIP: CEMENT VERSUS CEMENTLESS, MASSACHUSETTS, 1985.
- 17. THR: STATE OF THE ART, MASSACHUSETTS, 1986.
- 18. REVISION HIP REPLACEMENT USING THE TOTAL SYSTEM, MASSACHUSETTS, 1986.
- 19. THR CONTEMPORARY CONCEPTS BIOSKILLS WORKSHOP, MASSACHUSETTS, 1987.
- 20. INSTRUCTIONAL COURSE ON SURGERY OF THE KNEE, MASSACHUSETTS, 1987.
- 21. CONTROVERSY IN TOTAL HIP REPLACEMENT, MASSACHUSETTS, 1987.
- 22. RINEMAX WORKSHOP, MASSACHUSETTS, 1987.
- 23. UNCEMENTED TOTAL JOINT REPLACEMENT, ARIZONA, 1987.
- 24. 18TH ANNUAL COURSE: CEMENT VS CEMENTLESS, MASSACHUSETTS, 1988.
- 25. INSALL-BURSTEIN TOTAL KNEE SYSTEM, COLUMBUS, 1988.
- 26. HANDS ON WORK SHOP WITH DR. CHARLES ENG, WASHINGTON, 1988
- 27. AAOS TECHNIQUES OF TOTAL KNEE ARTHROPLASTY, PHILADELPHIA, PA, MAY, 1988.

- 28. PRECISION TOTAL HIP COURSE, VALLEY FORGE, PENNSYLVANIA, JUNE, 1988.
- 29. ARTHRITIC KNEE SURGICAL TREATMENT, NEW YORK, DECEMBER, 1988.
- 30. GLOBAL CONCEPTS AND CONTROVERSY IN TOTAL HIP AND TOTAL KNEE REPLACEMENT ARTHROPLASTY, SPONSORED BY JOINT IMPLANT SURGERY AND RESEARCH FOUNDATION, MAUI, MARCH, 1989.
- 31. CONTROVERSY IN TOTAL HIP REPLACEMENT, SPONSORED BY THE HARVARD MEDICAL SCHOOL, BOSTON, MASS., OCT., 1989.
 32. CONTROVERSY IN TOTAL HIP REPLACEMENT, SPONSORED BY THE

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- HARVARD MEDICAL SCHOOL, BOSTON, MASS., OCT. 1990
- 33. STATE OF THE ART TOTAL KNEE REVIEW COURSE, SPONSORED BY THE KNEE SOCIETY, OCT., 1990.