IN THE COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

TRACY ANN SMITH, ADMIN, etc., Plaintiff, VS. UNIVERSITY HOSPITALS OF CLEVELAND, et al., Defendants.) Case No. 327823 JUDGE NANCY A. FUERST TELEPHONIC DEPOSITION OF MARY LOUISE HLAVIN, M.D.

THE TELEPHONIC DEPOSITION OF MARY

LOUISE HLAVIN, M.D., taken before Sandra K. Glick, Certified Shorthand Reporter and Notary Public of the State of Iowa, commencing at 11 a.m., January 5, 1999, at Suite 2100, 1351 West Central Park, Davenport, Iowa.

Reported by: Sandra K. Glick, C.S.R.

APPEA	RANCES Page		Pag
Plaintiff by:	JEANNE M. TOSTI	1 MARY LOUISE HLAVIN, M D ,	
(Via telephone)	Attorney at Law skylight Office Tower	2 called as a witness, having been first duly	
	Suite 660 1660 West Second Street	3 sworn, testified as follows	
	Cleveland, Ohio 44113	4 MS, TOSTI' All right. Let the	
Lee Brooks, M.D., and Children's		5 record reflect that this is a discovery	
and Children's Research Fund by: (Via telephone)	WARREN ROSMAN Attorney at Law	6 deposition of Dr Mary Louise Hlavin, who is a	
(via corchange)	Terminal Tower Suite 2500	7 defendant in this action It's being taken by	
	50 Public Square Cleveland, Ohio 44113	8 telephone as a convenience to the doctor and	
Michael P. Rowane,	Cleveland, onto 4413	9 pursuant to adreement by counsel It's a	
D.O., by:	JOHN A. SIMON	10 standard deposition in all respects, except that	
(Via telephone)	Attorney at Law Bulkley Building	ll the witness is in Iowa and she's been sworn in	
	7th Floor 1501 Euclid Avenue	12 and her deposition will he transcribed by a	
	Cleveland, OXo 44115	3 state of Iowa court reporter that is present	
University Hospitals of Cleveland by:	PATRICIA CUTHBERTSON	4 with her Counsel for all parties participating	
(Via telephone)	Attorney at Law The Caxton Building	5 in this deposition via telephone conferencing	
	Suite 490 812 Huron Road		
	Cleveland, Ohio 44115-1126	6 have previously identified themselves for the	
Mary Louise Hlavin, M.D Stephen D. Collins, M.D		7 court reporter May I have a stipulation from	
University Neurologists Association and Univers		8 all counsel that Ohio rules will apply and any	
Neurosurgeons of Cleveland by:	COLLEEN PETRELLO	9 defects in notice or service are waived-	
(Via telephone)	Attorney at Law 100 Franklin's Row	'0 MR ROSMAN Yes	
	34305 Solon Road Cleveland, Ohio 44139	1 MR SIMON Yes.	
	Cleveland, onio 44139	2 MS CUTHBERTSON' Yes	
		3 MS PETRELLO No objection	
		4	
		5	
	Page	3	Page
IND		1 DIRECT EXAMINATION	0
Examination by:	Page	2 BY MS. TOSTI:	
Examination by:	rage		
Ma Maati	-	3 0 Okay Dr Hlavin for the record would	
Ms. Tosti	5	3 Q. Okay, Dr. Hlavin, for the record, would 4 you please give the court reporter your full	
Mr. Simon	5 41	4 you please give the court reporter your full	
		4 you please give the court reporter your full 5 name.	
Mr. Simon		 4 you please give the court reporter your full 5 name. 6 A. Mary Louise Hlavin. 	
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(appender)

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1 Department of Neurological Surgery, and that was	1 Q. Have you had your deposition taken as a
2 11100 Euclid Avenue, Cleveland, Ohio 44106.	2 fact witness in a case, other than the times
3 Q. Now at the time that you rendered care	3 that you were rendering testimony as an expert
4 to Patricia Smith, were you an employee of a	4 or as a defendant?
5 professional medical group?	5 A. I think I've done that once too.
6 A. Yes.	6 Q. Now I'm sure your attorney has gone
7 Q. And what was the name of that medical	7 over some of the guidelines for a deposition,
8 group?	8 but I'm going to repeat some of them now. This
9 A. University Neurosurgeons.	9 is a question-and-answer session under oath, and
10 Q. Was that particular medical group	10 it's important that you understand the questions
11 composed only of neurosurgeons?	11 that I'm asking you, and if you don't understand
12 A. Yes.	12 them or if I've phrased them inartfully, just
13 Q. I'm sorry , did you answer yes?	13 let me know and I'll be happy to repeat the
14 A. Yes.	14 question or to put it in another form that
15 Q. How many neurosurgeons were in that	15 hopefully you'll be able to understand.
16 group?	16 Otherwise, I'm going to assume that you
17 A. Four.	17 understood my question and that you're able to
18 Q. It sounded like you got cut off there.	18 answer it, and you have to give all of your
19 I don't know if you answered or not.	19 answers verbally because our court reporter
A. I'm counting. We were in flux. Seven.	20 can't take down any nonverbal head nods or hand
21 Q. And at the time that you rendered care	21 motions.
22 to Patricia Smith, did you provide professional	22 If at any time you wish to refer
23 services for any entities other than through	213 to the medical records which I'm assuming that
24 your professional group practice?	24 your counsel has provided to you, please feel
A. I'm sorry, could you repeat the	25 free to do so.
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1 question?	1 At some point during the
2 Q. At the time that you rendered care to	2 deposition one of the counsel that are
3 Patricia Smith, did you render professional	3 participating in this deposition may enter an
4 services for any other entity other than your	4 objection. You are still required to answer my
5 professional group practice?	5 question unless your counsel tells you not to.
6 A. Oh, no.	6 I believe that the court reporter
7 Q. And what I'm asking is if you had any	7 has a set of marked exhibits; is that correct?
8 other employment obligations or you were doing	8 A. Yes, she gave them to me.
9 professional service for something other than	9 Q. Okay. And those I may refer to at some
10 the group.	10 point in time. All of the various counsel have
11 A. No.	11 been provided with copies of those exhibits, and
12 Q. Have you had your deposition taken	12 they've all been marked with exhibit numbers
13 before, Doctor?	13 just to make it a little easier to refer to the
14 A. Yes.	14 various pages.
15 Q. How many times?	Now, Doctor, you've indicated that
16 A. I don't know. Half a dozen, a dozen.	16 you have been named as a defendant in previous
17 Q. And the times that you had your	17 medical negligence cases; is that correct?
18 deposition taken, why was it being taken? And	118 A. Yes.
19 by that I mean were you a defendant, an expert	19 Q. How many times have you been named as a
20 witness in a case?	20 defendant?
21 A. Both.	21 MS. PETRELLO: Jeanne, this is
22 Q. So you've had your deposition taken as	22 Petrello. Just have a continuing objection
23 a defendant as well as a professional medical	23 here, but go ahead.
23 a defendant as well as a professional medical24 expert?	23 here, but go ahead.24 A. I don't recall the exact number. Five
 23 a defendant as well as a professional medical 24 expert? 25 A. Yes. 	 23 here, but go ahead. 24 A. I don't recall the exact number. Five 25 or six. Seven maybe. I don't know. I don't

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1 keep track of the numbers.	1 operated on a gentleman, and he had a
2 Q. Were all of those filed in Ohio?	2 postoperative Brown-Sequard syndrome, and the
3 A. Yes.	3 family sued several months after their father
4 Q. And were those filed during the time	4 subsequently died, although he went home went
5 that you were with University Neurosurgeons?	5 to rehab, went home, and then ultimately died at
6 A. No.	6 home, but the family sued later. That case was
7 Q. Some of them prior to that or after	7 also dropped, and then I think there's this
8 that?	8 case. That's all I can remember right now.
9 A. Prior.	9 Q. Thank you, Doctor.
10 Q. And was that when you were a resident?	10 Have you ever had your hospital
11 A. Yes.	11 privileges called into question, suspended, or
12 Q. Doctor	12 revoked?
13 MS. CUTHBERTSON: Show an	13 A. No.
14 objection for Cuthbertson on that one. Go	14 Q. What states are you currently licensed
15 ahead, Jeanne.	15 to practice medicine in?
16 Q. Doctor, do you recall the names of any	16 A. Iowa, Illinois, and I think my Ohio
17 of the plaintiffs in those cases?	17 license is still active.
18 A. Not off the top of my head.	18 Q. And you were licensed in Ohio at the
19 Q. And would you tell me what the	19 time that you rendered care to Patricia Smith,
20 allegation of negligence was in those cases?	20 correct?
21 MS. CUTI-IBERTSON: Pardon me for	21 A. Yes.
1	
22 objecting. Just show a continuing objection for	22 Q. I'm not hearing an answer.23 A. Yes.
23 University Hospitals of Cleveland to the	
24 continuing line of questions. Go ahead, I won't	24 Q. I don't know if we've been cut off or 25 not.
25 make another objection on that, Jeanne.	23 1101.
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1 A. One suit was for presumed lack of	1 A. Yes.
2 informed consent, and the lady didn't like the	2 Q. Has your medical license in Ohio or any
3 appearance of her scar from her sural nerve	3 other state ever been suspended, revoked, or
4 biopsy. That case was dropped.	4 called into question?
5 In another case a lady had a	5 A. No.
6 stroke after a cerebral angiogram, and they sued	6 Q. And you've indicated that you have
7 because they said the stroke was due to a	7 acted as an expert in a medicolegal proceeding;
8 contrast allergy, which she indeed did not have	8 is that correct?
9 and she indeed had been given informed consent	9 A. Yes.
10 for her angiogram, and that suit was ultimately	10 Q. Would you tell me when you acted as an
11 dropped.	11 expert or how many times first, let's start
12 Another suit was with regards to a	12 with that?
13 woman who underwent a cervical spine surgery and	13 A. I actually testified in a trial in
14 had postoperative weakness, and the residents in	14 Texas, and I think that may have been in, I
15 that case were ultimately dismissed.	15 don't know, '94, maybe '95. I don't recall the
16 Another case was for a patient I	16 exact year; and I've given a deposition at least
17 never even took care of, but somehow my name was	17 in one other trial as an expert witness that I
18 initially put by the admitting for the as a	18 can recall.
19 physician of record, and it's a guy who had	19 Q. Of those two times that you can recall,
20 headaches after he had oh, excuse me, back	20 were you acting as an expert for a plaintiff or
21 pain after lumbar punctures after he had a	21 for the defendant?
22 subarachnoid hemorrhage, and he complained	22 A. Plaintiff.
23 because of his back pain. I was dismissed from	23 Q. And can you tell me what the
24 that suit.	24 allegations of negligence were in those cases?

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1 epidural abscesses.	1 Q. Doctor, on the first page of your
2 Q. Doctor, what hospitals do you currently	2 curriculum vitae, you have listed a fellowship
3 have privileges at?	3 training that you did, I believe a Van Wagenen
4 A. Genesis Medical Center in Davenport,	4 Fellowship.
5 Iowa; Trinity Medical Center in Illinois. It is	5 A. Yes.
6 Rock Island, Illinois; and Illini Hospital in	6 Q. Was that a neurosurgical fellowship?
7 it's either Moline or East Moline in Illinois.	7 A. Yes.
8 Q. Doctor, I would ask that you take the	8 Q. And you are board certified in
9 packet of exhibits, and if you would please look	9 neurosurgery; is that correct?
10 at the exhibit that's marked Number 19, which I	10 A. Yes.
11 believe is your curriculum vitae.	11 Q. Did you pass the board certification on
12 A. Yes.	12 your first try?
13 Q. Okay. I'd like you to look over that	13 A. Yes.
¹⁴ copy and just tell me if that particular copy of	14 Q. And are you board certified in any
15 your curriculum vitae is up-to-date and whether	15 other specialty area?
16 there are any corrections or additions that you	16 A. No.
17 would like to make to it.	17 Q. What is the reason that you left your
18 A. No, it is not up-to-date. I am no	18 practice in Ohio and moved to Iowa?
19 longer married. My business address is no	19 A. My ex-husband and I were divorced. He
20 longer with the Department of Neurological	20 was a neurologist on staff at University
21 Surgery at University Hospitals. You have the	21 Hospitals, and I no longer wished to be around
22 new business and residential addresses. The	22 him.
23 phone numbers are no longer correct either. I	2B Q. When did you relocate to Iowa?
24 have resigned my faculty appointment at Case	A. This September. September 1998.
25 Western Reserve University. I have several more	25 Q. Doctor, in regard to any of the
·	+
Page 15 1 grants that should have been that were	I articles that appear on your cumculum vitae,
2 awarded since this CV. I have several more	2 do any of those articles deal with the subject
3 articles that have been published since this CV,	3 matter of meningioma?
4 and several other abstracts and lectures since	4 A. Under book chapters, number 5, "Benign
5 this CV.	5 Brain Tumors and Intracranial Lesions in the
6 Q. Doctor, do any of the grants that you	6 Elderly." Meningioma is one of those benign
7 were awarded deal with the subject matter of	7 brain tumors.
8 coronary artery disease or sleep apnea?	8 Q. Okay. And any of the articles deal
9 A. No.	9 with the subject matter of sleep apnea?
9 A. No.10 Q. What about meningioma?	10 A. No.
1 A. No.	10 A. No. 11 Q. Have you ever participated in any
12 Q. And the same question as to any of the	12 research that deals with the subject matter of
13 additional articles that do not appear on your	12 research that dears with the subject matter of 13 sleep apnea?
¹⁴ curriculum vitae, do any of the articles deal	$\begin{array}{cccccccccccccccccccccccccccccccccccc$
15 with those subjects?	14 A. No. 15 Q. And have you ever taught or given a
16 A. No.	15 Q. And have you ever taught of given a 16 formal lecture on the subject matter of sleep
Q. And the abstracts, same question.	17 apnea?
And the abstracts, same question.	
19 Q. Do you have any administrative	
	19 Q. Now about in regard to meningioma?
20 appointments at any of the hospitals that you 21 currently have privileges at?	20 MS. PETRELLO: What, participate 21 in lectures?
	22 Q. No, given a formal presentation or
23 Q. And do you hold any appointments at	23 taught on the subject matter of meningioma?
24 Case Western Reserve University?	A. I used to do a medical student clinical
25 A. No.	25 lecture on brain tumors, and we would have a

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Page 1	Page 20
1 short discussion that involved meningiomas with	1 for severe obstructive sleep apnea?
2 the third-year medical students rotating on	2 A. No.
3 their neuroscience clinical clerkship.	3 Q. Okay. And then the second part of that
4 Q. And was that particular lecture or	4 question, have you treated patients where severe
5 presentation ever reduced to a written form or a	5 obstructive sleep apnea was an associated
6 videotape?	6 problem?
7 A. No.	7 A. Yes.
8 Q. Doctor, would you please tell me what	8 Q. And in those patients did you manage
9 you have reviewed in preparation for this	9 any of the care for their sleep apnea or did
10 deposition.	10 that fall to another physician?
11 A. Just my old records. Hello.	A. No, I did not care for it, and yes, it
12 Q. There was something additional you	12 did fall to the other physician.
13 wanted to say?	13 Q. Okay. Doctor, do you know whether
14 A No. I just you were pausing so long	14 severe obstructive sleep apnea can cause
15 I didn't know whether you heard me.	15 hypoxia?
16 Q. Okay. Have you done any research in	16 A. Yes.
17 textbooks or journals?	17 Q. Is that an answer, yes, it can cause
18 A. No.	18 hypoxia? And I'm just asking for
Q. Have you been provided with any of the	19 clarification.
20 records of Dr. Collins?	20 MR. SIMON Note my objection.
21 A. No.	21 John Simon.
22 Q. From the sleep lab?	22 Q. Let me rephrase the question because
23 A. No.	23 I'm not understanding what you're answering yes
Q. Have you seen the death certificate and	24 to. Can severe obstructive sleep apnea cause
25 autopsy in this case?	25 hypoxia?
Page 1	Page 21
1 a.No.	1 A, Yes.
2 Q. And in regard to the Family Practice	2 Q. And does hypoxia lower the threshold
3 records, I believe that there were several pages	3 for seizures?
4 that were contained in your records, but other	4 A. Yes.
5 than those, have you seen the complete set of	5 Q. And can severe obstructive sleep apnea
6 Family Practice records?	6 cause hypoxic seizures?
7 A. No.	7 A. I don't know.
8 Q. Have you consulted with any physicians	8 Q. To your knowledge, are there any
9 in preparation for this deposition?	9 life-threatening complications associated with
10 A. No.	10 severe obstructive sleep apnea?
11 Q. And other than with counsel, have you	11 A. Yes.
12 discussed this case since it was filed with	12 Q. And could you tell me what those are?
13 anyone else?	13 A. Death.
14 A. No.	14 Q. I would ask that you tell me what they
15 Q. Do you have any personal notes or a	15 are.
16 personal file, other than your office records,	16 A. Ijust did. Death.
17 on this case?	17 MS. PETRELLO: Death.
18 A. No.	18 Q. You're cutting in and out here. I
19 Q. Doctor, in your clinical practice have	19 believe your answer is yes?
20 you ever treated any patients with severe	20 A. No, no. My answer to the question you
21 obstructive sleep apnea?	21 said are there my answer to the question was
22 A. Do you mean for their sleep apnea or	22 death was the complication that can be
23 for an associated neurosurgical problem?	23 associated.
24 Q. Well, let's take that as a two-part	
	24 Q. I thought you said yes. You said
25 question. Have you ever treated any patients	Q. I thought you said yes. You said25 death?

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1 A. I said death.	1 meningioma have any implications for the
2 Q. Okay, thank you.	2 patient?
3 Doctor, is there a textbook in	3 A. Yes.
4 your particular field of practice that you	4 Q. And what about the location?
5 consider to be the best or the most reliable?	5 A. Yes.
6 A. No.	6 Q. And if a calcified meningioma is going
7 Q. Are there any you refer to on a regular	7 to cause problems for the patient, what type of
8 basis in your practice?	8 signs or symptoms might you see?
9 A. Yes.	9 A. Patient might have headaches, they
0 Q. Would you tell me what textbook or	10 might have seizures, they might have a
1 textbooks those are?	11 neurologic deficit. That is to say they might
2 A. Youmans Textbook of Neurological	12 have some weakness, they might have some
3 Surgery. That's Y-o-u-m-a-n-s. Wilkins and	13 numbness and tingling, they might have visual
4 Rengachary Neurosurgery. There are many others.	14 loss, they might have unsteadiness. It all
5 Q. Do you consider either of those	15 depends upon where the tumor is located and what
6 authoritative?	16 structures it's pressing on.
7 A. Yes.	17 Q. And when a calcified meningioma causes
8 Q. Doctor, what is a grand mal seizure?	18 symptoms, all of the ones you just mentioned,
9 A. It refers to a seizure in which a	19 are seizures one of the frequent things that you
0 patient loses consciousness and has tonic-clonic	20 see occurring?
1 activity of the extremities and is often	21 A. Common.
2 associated with tongue biting and incontinence.	22 Q. And what is the treatment, if treatment
Q. And is a term used to refer to grand	23 is in order, for a patient with a calcified
4 mal seizures, is the term "generalized scizure,"	24 meningioma?
5 is that synonymous?	A. Well, that all goes back to the size,
Page 23	Page 23
1 A. No.	1 the location, the patient's age, the patient's
2 Q. Is there a difference between those two	2 medical condition, and their symptoms. In some
3 terms that you can describe for me?	3 patients you might not do anything, in some
A. A generalized seizure would refer to	4 patients except observe it. In other
5 one that involves the whole brain, but it might	5 patients they might require surgery. Other
6 not necessarily involve tonic-clonic activity of	6 patients might get treated with specialized
7 the extremities.	7 forms of radiation. So it varies from person to
8 Q. What is a calcified meningioma?	8 person.
9 A. Well, a meningioma is a tumor of the	9 Q. Doctor, would you agree that in order
0 sac that covers the brain, the meninges, and a	10 to treat somebody with seizures effectively,
1 calcified meningioma is one that has calcium	11 it's important to know what's causing the
2 deposits in it.	12 seizures?
3 Q. And in regard to a patient's state of	MS. PETRELLO: Petrello.
4 health, what's the significance of a calcified	14 Objection.
5 meningioma?	MR. SIMON Objection for Simon.
6 A. Could you clarify that question a	16 A. Not necessarily.
7 little bit more?	Q. So you don't believe it's important to
8 Q. Does a calcified meningioma have any	18 know what causes the seizures when you are
9 clinical significance to the patient?	19 treating a patient?
A. Not necessarily. It depends upon the	20 A. I don't think that was the question you
1 tumor.	21 asked.
Q. So some may have and some may not,	22 Q. Well, I'll repeat my question. Would
3 would that be correct?	23 you agree that in order to treat seizures
A. That is correct.	24 effectively it's important to know what's
Q. Okay. Does the size of a calcified	25 causing the seizures.

.'...<u>.</u>

D 26	
Page 26	e e
1 MS. PETRELLO. Objection.	1 visit?
2 Petrello.	2 A. Well, it looks like she had a what
3 A. You can treat seizures and cure	3 was that she possibly had actually several4 seizures, one on October 5th in which she had
4 seizures without ever knowing what caused them.	
5 However, I would say that it is very important	5 spasms of her body, and then it looks like one
6 to try and find an etiology for the seizures,	6 month earlier she had an episode after drinking7 some champale and then took some cough medicine,
7 but they can be treated, and in fact cured,8 without ever knowing what caused it.	
	8 and her daughter went to wake her up and she had
9 Q. Do you have an independent recollection 10 of Patricia Smith as you sit here today, aside	9 trouble waking up, and she, I believe I can't10 recall whether she went to an emergency room at
11 from what you have reviewed in the medical	11 that time and had a CAT scan, but then was
12 records?	12 subsequently treated, seen and treated by
	13 Dr. Rowane and Dr. Collins, and was therefore
A. Yes.Q. When is the first time that you	14 referred to me for evaluation of a possible
15 rendered care to Patricia Smith?	15 lesion seen on her CAT scan.
	16 Q. So the patient or her family described 17 to you two episodes; is that correct?
17 Q. And how many times did you see her?18 A. I believe two.	18 A. I believe so.
	 A. I believe so. Q. And, Doctor, I'd like you to look at
19 Q. How is it that she came under your 20 care?	20 Plaintiff's Exhibit Number 1, which I believe is
21 A. She was referred to me by her	21 the first page of your office notes.
22 physician.	22 A. Yes.
23 Q. And who made that referral?	23 Q. You have on about the third line down,
 A. I believe it was Dr. Rowane, or someone 	24 1believe it says, "4 or 5 a.m." Do you see
25 from Dr. Rowane's office.	25 that?
Page 27	e e
1 Q. When the referral was made, did you	 A. Yes. Q. Is that referring to the episode that
 2 receive any information about Patricia Smith? 3 A. I don't know the answer to that 	2 Q. Is that referring to the episode that 3 occurred on October 5th, or is that the previous
3 A. I don't know the answer to that	
4 question	
4 question.	4 episode one month earlier?
5 Q. Did you talk to Dr. Rowane any time	4 episode one month earlier?5 A. No, I think that's referring to the
5 Q. Did you talk to Dr. Rowane any time6 prior to the time that you saw Patricia Smith?	 4 episode one month earlier? 5 A. No, I think that's referring to the 6 way I interpret my notes is that was the episode
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 5 Q. Did you talk to Dr. Rowane any time 6 prior to the time that you saw Patricia Smith? 7 A. I don't think so. 8 Q. And do you recall talking to anyone 9 from the Family Practice Center prior to the 10 visit with Patricia Smith? 11 A. I don't recall that. 12 Q. Did you speak to Dr. Collins at all 13 before you saw Patricia Smith? 14 A. I don't recall doing that. 15 Q. Did anyone accompany Patricia Smith to 16 her office visit with you on December 7th of 17 1995? 18 A. She was accompanied, and I think it's 19 both times, by family members, and I can't 20 recall whether it was sisters or her mother, but 21 she had family members with her. 22 Q. And in regard to the information that 	 4 episode one month earlier? 5 A. No, I think that's referring to the 6 way I interpret my notes is that was the episode 7 one month earlier, but I don't recall. 8 Q. Okay. Doctor, were you told that each 9 of these episodes occurred when Patricia Smith 10 was lying down sleeping or napping? 11 A. I don't recall. 12 Q. And the notation that you have, "spasms 13 of the body," what does that refer to? 14 A. Their description the family's 15 description of the seizure or the episode. 16 Q. Did they give you any additional 17 information as to exactly what those spasms 18 looked like? 19 A. Don't recall. 20 Q. Wow, at the time that you saw Patricia
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 5 Q. Did you talk to Dr. Rowane any time 6 prior to the time that you saw Patricia Smith? 7 A. I don't think so. 8 Q. And do you recall talking to anyone 9 from the Family Practice Center prior to the 10 visit with Patricia Smith? 11 A. I don't recall that. 12 Q. Did you speak to Dr. Collins at all 13 before you saw Patricia Smith? 14 A. I don't recall doing that. 15 Q. Did anyone accompany Patricia Smith to 16 her office visit with you on December 7th of 17 1995? 18 A. She was accompanied, and I think it's 19 both times, by family members, and I can't 20 recall whether it was sisters or her mother, but 21 she had family members with her. 22 Q. And in regard to the information that 	 4 episode one month earlier? 5 A. No, I think that's referring to the 6 way I interpret my notes is that was the episode 7 one month earlier, but I don't recall. 8 Q. Okay. Doctor, were you told that each 9 of these episodes occurred when Patricia Smith 10 was lying down sleeping or napping? 11 A. I don't recall. 12 Q. And the notation that you have, "spasms 13 of the body," what does that refer to? 14 A. Their description the family's 15 description of the seizure or the episode. 16 Q. Did they give you any additional 17 information as to exactly what those spasms 18 looked like? 19 A. Don't recall. 20 Q. Wow, at the time that you saw Patricia 21 Smith on December 7th, did you have the results 22 from any diagnostic tests to use in your 23 evaluation?

1 and evaluated the patient. It's very well1 did you find?2 possible that when I saw her the group had2 A. The scan did not appear to be normal,3 the Family Practice group had not sent me the3 but I was not sure whether it represented a4 information and therefore after I saw her I4 small meningioma, calcified meningioma, or5 requested information, or had my secretary5 whether it represented some hyperostosis or some6 request information from them.6 thickening of the skull, some focal thickening	age 32
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6 request information from them. 6 thickening of the skull, some focal thickening	
17 O Okay Doctor I'd like you to take a 17 of the clault and I suggested that the noticent	
7Q. Okay. Doctor, I'd like you to take a7 of the skull, and I suggested that the patient	
8 look at Plaintiff's Exhibit number 6.8 undergo an MRI scan of the brain and take things	
9 A. Okay. 9 from there.	
10Q. And if you could just identify that10Q. Her electroencephalogram, the EEG, was	
11 document for me, what it is. 11 normal based upon the report; is that correct?	
12A. It looks like a letter summarizing my12A. That's what the report said, I believe.	
13 office visit with Patricia to Dr. Rowane.13Q. Doctor, in your letter to Dr. Rowane of	
14Q. And the date on that letter?14December 7th, which is Plaintiff's Exhibit	
15A. December 7th.15Number 6, you indicate that review of the	
16Q. And that would have been written on the16 patient's EEG revealed a normal EEG, correct?	
17 same day that you saw Patricia Smith, correct? 17 A. Yes.	
18A. Usually I do it the same day.18Q. And in regard to your neurological exam	
19Q. Now, in that particular letter, if you19that you did on her, that also was normal; is	
20 would like to just scan through it because I 20 that correct?	
21 believe you refer to some diagnostic tests21A. Yes.	
22 there, and I'd just like you to refresh your 22 Q. At the time that you saw her on	
23 memory by reading over what you wrote. 23 December 7th, did you Rave an opinion as to v	what
24A. All right.24 was causing her seizures?	
25Q. Now, at the time that you saw Patricia25A. I don't recall.	
Page 31 P	Page 33
1 Smith, did you have either close to the time1Q. What was within your differential	
2 of the office visit or immediately after, did 2 diagnosis on December 7th?	
3 you have any diagnostic test results to help you 3 A. I don't recall.	
4 in your evaluation? 4 Q. Doctor, based on the information that	ĺ
5 A. Well, at the time I wrote the letter, 5 you had available on December 7th of 1995, w	vould
6 which may have been at the end of the day, I 6 it be fair to say that you were unable to rule	
7 probably did have the information from 7 out that what was seen on the CT and MRI may	
8 Dr. Rowane's office because I refer to the 8 merely be due to skull bone growth rather than	n
9 results from the EEG, which I would not have 9 tumor? Would that be a fair statement?	
10 personally read or interpreted. And as far as 10 A. Yes.	
11 the CAT scan goes, I can't recall usually my 11 Q. Doctor, if the area on the imaging	
12 secretary usually I would have looked at the 12 studies was due to focal thickening of the	
13 scans myself because they are available through 13 skull, would that be considered a normal	
14 the radiology department. So I would not 14 variation?	
15 necessarily have relied on the report from the 15 A. Yes.	
16 radiologist. Q. And if this was just focal thickening	
17Q. And once you had completed your17of the skull, it would not likely be a cause of	
18 evaluation of Patricia Smith and had an 18 seizures, correct?	
19 opportunity to look at diagnostic studies, what 19 A. Correct.	
20 were your clinical findings?20 Q. Now you indicated that your plan of	
21 A. What do you mean by that? What did 21 care was to have her undergo a contrasted MRI	Ι,
22 I 22 correct?	1
22 I 22 correct?	

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	ge 34	Page 36
1 A. Yes.		1 Q. Which was January 5th of 1996, correct?
2 Q. Okay. Once that particular diagnostic		2 A. 5th, yes.
3 study was done, did you look at the actual films	S S	3 Q. In your letter to Dr. Rowane, about the
4 yourself?		4 third line from the bottom, I believe it says,
5 A. I believe I did.		5 "I am concerned the patient may be suffering
6 Q. And what results did you find on the		6 from sleep apnea." Do you see that reference?
7 contrasted MRI?		7 A. Yes.
8 A. There was no enhancement of the lesion		8 Q. Why were you concerned for this
9 which weighed against the meningioma, or should		9 patient?
10 I say weighed against it being a meningioma.		A. Because she was having all these
11 However, I believe it looked distinct from the		1 symptoms that she was suffering from and that I
12 normal skull, and therefore I thought that it		12 didn't think were related to either her brain
13 most likely was a meningioma, but I still could		13 tumor or the seizures, and I thought that she
14 not rule out the possibility that it was		14 had a treatable disorder that could help her for
15 hyperostosis of the inner table of the skull.		15 her symptoms.
16 Q. Okay. After you saw Patricia Smith on		16 Q. If she had sleep apnea, would that
17 December 7th, you then saw her once again; is		17 place her at increased risk for seizures?
18 that correct?		MS. PETRELLO: Objection.
19 A. Yes.		19 Petrello.
20 Q. And that was on I believe January 5th		A. I will defer to an expert in sleep
21 of 1996?		21 apnea on that. I don't know the answer to that
22 A. Yes.	/	22 question.
23 Q. And what was the reason that you saw	1	23 Q. Doctor, if Patricia Smith was having
24 her on that particular visit?		24 oxygen desaturations down to 60 percent from
25 A. To review her MRI scan with her.		25 sleep apnea, could that trigger seizure
Pac	ge 35	Page 37
1 Q. And at that visit did you obtain any	50 55	1 activity?
2 additional clinical information from the		2 MS PETRELLO: Objection.
3 patient?		3 Petrello.
4 A. She stated that she was feeling tired,		4 MR. SIMON: Objection. Simon.
5 sleeping while on the phone, snoring at night.		5 A. I don't know.
6 She had had no further frank seizure episodes.		6 Q. Did you discuss sleep apnea with
7 Q. And did you make any type of a		7 Patricia Smith at all when she visited you on
8 differential diagnosis at that visit?		8 January 5th?
		9 A. Obviously I must have since I
9 A. Well, as I said, I thought that she 10 could very well still have a meningioma, and it		10 encouraged her to proceed with the sleep study,
11 may have been producing a seizure disorder in	1	11 but I have no other recollection beyond that.
	1	
12 her, but it sounded as though she was having13 additional symptoms which I thought might		Q. Do you know how it is that you became aware that she was scheduled for a sleep study?
13 additional symptoms which I thought might 14 represent sleep apnea, and apparently she had		· · · · · · · · · · · ·
14 represent sleep apnea, and apparently sne had 15 already been scheduled for a sleep study by	1	A. I assume through my patient, theconversation with the patient and her mother.
16 Dr. Rowane, and therefore I deferred treatment	1	16 Q. Did you have any responsibility for
17 of that to him and management of the seizures to		17 following up on the results of that sleep study?
18 Dr. Collins.		18 A. No.
19 Q. Okay. I would like you to refer to		19 Q. And do you know who was responsible for
20 Plaintiff's Exhibit Number 7.		20 following up on the sleep study results?
21 A. Yes.	1	21 A. No.
22 Q. And if you would please identify what		22 MR. ROSMAN: Objection. Rosman.
23 Plaintiff's Exhibit Number 7 is.	1	23 A. No.
	1	
A. It's a letter to Dr. Rowane detailing		Q. Did you ever review the report from
A. It's a letter to Dr. Rowane detailing my office visit with Patricia Smith on that day.		

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		January 5, 1999
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A. No.	1	MR. ROSMAN: Rosman. Objection.
Q. And did Dr. Rowane or Dr. Collins or	2	MR. SIMON Simon also objection.
Dr. Brooks ever discuss the results of Patricia	3	A. No opinion.
Smith's sleep study with you?	4	Q. Doctor, you did a Dilantin level on
A. No.	1	Patricia Smith when she visited you on January
Q. Did you ever talk to Dr. Rowane or	1	5th of 1996; is that correct?
Dr. Collins about the fact that you were	7	A. Yes.
concerned that she was having problems with	8	Q. And do you have the results of that
sleep apnea? And I'm referring to a		particular Dilantin level in your records?
discussion rather than a letter that you sent to	10	A. Yes.
Dr. Rowane.	11	Q. Was her Dilantin level at a therapeutic
A I don't recall.		Bevel when you saw her?
Q. Did you discuss it with him or with	13	A. No.
Dr. Collins?	14	Q. Okay. If her Dilantin level was not
A. Don't recall.		within the therapeutic range, would it be likely
Q. Okay. If Patricia Smith had a		to control seizures?
calcified meningioma, what would be indicators	17	MS. PETRELLO: Objection.
that she would need surgery?		Petrello.
A. If she was suffering a neurologic	19	MS. CUTHBERTSON Object to form.
deficit from it, if it was rapidly growing and	1	Cuthbertson.
could potentially cause her problems in the	21	A. Less likely, but not necessarily
future.	1	nontherapeutic.
Q. Okay. Doctor, are you aware that no	23	Q. I'm sorry, I didn't hear the beginning
tumor or calcified meningioma was found on	1	part of your answer.
autopsy of Patricia Smith's brain by the	25	A. Yes, it would be less likely to control
Page 39		Page 41
Cuyahoga County coroner?	1	seizures than if it were in a higher range.
A. Yes.	2	Q. And when you found that her Dilantin
Q. And how did you become aware of that	3	was not within a therapeutic level, did you take
fact?	4	any action?
A. I heard about it about five minutes	5	MS. PETRELLO: Objection. Just
before the deposition through the counsel.	1	she's already testified she wasn't following her
Q. Okay. You do not have to testify as to	7	for the seizures. This is Petrello. Go ahead,
any conversations that you had with counsel.	8	Doctor.
A. Oh, okay.	9	A. What I generally I don't have
Q. Doctor, I'd like you to assume that the	1	specific recollection of this, but what I
autopsy of the brain performed by the Cuyahoga	1	generally would have done in situations like
County coroner found no tumor or evidence of		this is to notify the treating physician, i.e.,
calcified meningioma and that Patricia Smith's	13	Dr. Collins.
sleep study showed her to be having severe	14	Q. To your knowledge, was Dr. Collins the
obstructive sleep apnea with oxygen	3	one that would be managing her from a medical
6 desaturations falling to 60 percent during	16	perspective in regard to the seizures?
	17	A. Yes.
sleep, and that the two seizure episodes that		Q. And why is it then that you did the
she had occurred while she was lying down	18	
she had occurred while she was lying down sleeping or napping, and assuming those facts to		therapeutic levels on the Dilantin rather than
she had occurred while she was lying down sleeping or napping, and assuming those facts to be true, do you have an opinion as to whether	19	therapeutic levels on the Dilantin rather than just allowing Dr. Collins to take care of that?
she had occurred while she was lying down sleeping or napping, and assuming those facts to be true, do you have an opinion as to whether her seizures were likely due to sleep apnea?	19	therapeutic levels on the Dilantin rather than
she had occurred while she was lying down sleeping or napping, and assuming those facts to be true, do you have an opinion as to whether	19 20	therapeutic levels on the Dilantin rather than just allowing Dr. Collins to take care of that?
she had occurred while she was lying down sleeping or napping, and assuming those facts to be true, do you have an opinion as to whether her seizures were likely due to sleep apnea?	19 20 21	therapeutic levels on the Dilantin rather than just allowing Dr. Collins to take care of that? A. Don't recall.
 she had occurred while she was lying down sleeping or napping, and assuming those facts to be true, do you have an opinion as to whether her seizures were likely due to sleep apnea? MS. PETRELLO: Petrello. 	19 20 21 22	therapeutic levels on the Dilantin rather thanjust allowing Dr. Collins to take care of that?A. Don't recall.Q. After you saw her on January 5th of

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Page 42	Dage 44
1 calcified meningioma, what was the plan of care	Page 44 1 Cuthbertson.
2 in regard to that?	2 MS. PETRELLO: Petrello too.
	3 MR. ROSMAN: Objection Rosman.
3 MS. PETRELLO. Jeanne, that wasn't	5
4 her testimony. This is Petrello. I don't think	4 MR SIMON Simon also.
5 she ever said for sure whether or not she had a	5 A. No.
6 calcified meningioma.	6 Q. Do you blame Patricia Smith in any way
7 Q. Well, let me rephrase my question	7 for her own death?
8 then.	8 A. Yes.
9 After you saw her on January 5th	9 Q. And what is the basis of your opinion?
10 of 1996, what was your plan of care for her?	10 A. She was morbidly obese.
11 A. The plan was to observe the cranial	11 Q. Okay. Doctor, I believe you just
12 lesion with serial head CT scans.	12 testified that you had no opinion as to her
Q. And how often would those be done?	13 cause of death. So I will ask
A. At a six-month period of time for the	14 A. I don't know what caused her death, but
15 initial year.	15 certainly morbid obesity puts people at risk for
Q. And how is it that you learned of	16 a shorter lifespan.
17 Patricia Smith's death?	17 Q. Okay. And is it your opinion then that
A. I can't remember.	118 her morbid obesity was a contributor to her
Q. Did you learn of her death before this	19 death?
20 case was filed?	20 A. Possibly.
21 A. I don't remember.	21 Q. And I'm going to ask my question again
22 Q. After Patricia Smith died, did you	22 then. Do you have an opinion as to her cause of
23 speak to any of the family members?	23 death?
A. I don't remember. I don't think so.	A. No. I don't know what caused her
25 Q. Did you have any conversations with	25 death, but her morbid obesity may have
Page 43	
rage 45	Page 45
1 Dr. Rowane, Dr. Collins, or Dr. Brooks after	Page 45 1 contributed to a number of the factors that
	-
1 Dr. Rowane, Dr. Collins, or Dr. Brooks after	1 contributed to a number of the factors that
 Dr. Rowane, Dr. Collins, or Dr. Brooks after Patricia Smith's death in regard to her care? 	 contributed to a number of the factors that could have caused her death.
 Dr. Rowane, Dr. Collins, or Dr. Brooks after Patricia Smith's death in regard to her care? A. No. 	 contributed to a number of the factors that could have caused her death. Q. Are you critical of the care rendered
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 Dr. Rowane, Dr. Collins, or Dr. Brooks after Patricia Smith's death in regard to her care? A. No. Q. Do you have an opinion as to what caused Patricia Smith's death? A. No. Q. Let me just look over my notes here for asecond. Bo you have an opinion as to whether Patricia Smith received appropriate follow-up for obstructive sleep apnea? MS. CUTHBERTSON Object. Cuthbertson. MR. ROSMAN: Objection. Rosman. MS. PETRELLO. Petrello too. MR. SIMON: Simon also. A. No. Q. I'm just looking over my notes so give me a second. We're almost done here as far as the questions that I have. Do you have an opinion if Patricia Smith had received successful treatment for coronary artery occlusion and obstructive sleep 	 contributed to a number of the factors that could have caused her death. Q. Are you critical of the care rendered to Patricia Smith by any healthcare providers? A. I have no opinion on that. Q. Okay. Doctor, have we discussed all the opinions that you presently have relative to this case that you feel are pertinent? MR. ROSMAN: Objection. Rosman. MS. PETRELLO: I'll object to that too. This is Petrello. It's not a very clear question, but go ahead. A. I think I've said everything I want to say. Q. Okay. Doctor, if there's any new opinions that you have between now and trial that are pertinent to this case, I would ask that you inform your counsel so that she could let me know about it, and I would reserve the right to continue your deposition relative to anything new that you should wish to express an

			January 5, 1999
	Page 46		Page 48
1	proceed.	1	asked you during the course of this deposition?
2	MR. ROSMAN. Yes, this is Warren	2	A. Yes.
3	Rosman. Miss Tosti, I'm going to object to your	3	MR SIMON Thank you, Doctor. I
	last comment. Dr. Hlavin is not testifying as	4	have nothing further.
	an expert. Whether she gains some opinion	5	MS. TOSTI. I have no further
	between now and whenever is of no matter to you,	6	questions. This is Jeanne Tosti.
	me, or whomever. She is a defendant here and is	7	MS. PETRELLO Okay. This is
	basically a fact witness. She is not an expert	8	Petrello. Doctor, you have the right to read
	witness and doesn't have to tell her expert	9	this. I'm going to suggest to you that we get
	opinions unless specifically asked, and you've	10	this written up and you read it, and, Jeanne, if
	just had your opportunity to ask her, and she	11	
	told you she had no expert opinions.	12	MS. TOSTI: Yes.
13	MS. PETRELLO: And this is	13	MS. PETRELLO. Okay. If there's
	Petrello. I will vehemently agree with that.	14	
	Whether she has opinions, she is not an expert,	15	I'll call you back in about 30 seconds.
	she is a defendant in this matter, and whatever	15	-
	she may think relative to her care is her	10	THE WITNESS: Okay. (Deposition concluded at 12:10 p.m)
	what's the word I want well, whatever.		
	Bottom line is she's not an expert and by expert	18	The deposition of Mary Louise
	reports that's going to criticize her care, I'm	20	The deposition of Mary Louise Hlavin, M D., is now complete When transcribed, the original of the deposition
		20	shall be given to Ms Jeanne M Tosti The original exhibits shall be distributed as
	sure she will very much have opinions, and to	1	follows Originals of Exhibits 1 through 19, inclusive, were attached to the original
	the extent that you want to ask her any	1	deposition which was given ϖ Ms Tosti.
	questions, this is your opportunity to do so.	23	
24 26	MS. TOSTI: And again I would on	24	
25	the record reserve my right if the Doctor does	25	
	Page 47		Page 49
1	intend to express medical opinions that go	1	(UNLESS OTHERWISE DIRECTED BY COUNSEL OR THE PARTIES HERETO, THE STENOGRAPHIC NOTES FOR THE FOREGOING DEPOSITION SHALL BE
2	beyond the care that she rendered, then I would	2	DESTROYEDAFTER A PERIOD OF 3 YEARS FROM THE
3	expressly request that counsel inform me, and I	3	DATE OF TAKING OF SAID DEPOSITION.)
4	reserve the right to continue her deposition to	4	
5	any new opinions that she has relative to things	5	920 - 1
6	outside of the care that she rendered. And with	6	
7	that, I will turn this over to whoever wishes to	7	
8	continue the deposition.	8	
9	MR. ROSMAN: This is Warren	9	
10	Rosman. I have no questions.	10	
11	MS. CUTHBERTSQN. Cuthbertson. No	11	
12	questions.	12	
13	-	13	
14	BY MR. SIMON:	14	
15	Q. Dr. Hlavin, this is John Simon. As I	15	
16	indicated before, I represent Dr. Rowane. I	16	
	just have one or two questions for you.	17	
18		18	
	here today, is it fair to say that you don't	19	
	consider yourself an expert in the field of	2.0	
		1	
20	sleep apnea?	21	
20 21	sleep apnea? A. That's very fair to say.	2:1 2:2	
20 21 22	A. That's very fair to say.	2.2	
20 21 22 23	A. That's very fair to say.Q. In addition to that, would you defer to	2:2 2:3	
20 21 22 23 24	A. That's very fair to say.	2.2	

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			T		
		Page 50	1	CERTIFICATE	Page 52
1	SIGNATURE PAGE	(:	2		
2	-	-			
3	I, MARY LOUISE HLAVIN, M.D., the		4	Shorthand Reporter and Notary Public of the State of Iowa, do hereby certify that I acted as	
	witness in the foregoing deposition, do hereby		5	the Certified Shorthand Reporter in the foregoing matter at the hme and place indicated	
5			6	herein, that I took in shorthand the proceedings had at said time and place; that said shorthand	
1	with the corrections noted on the attached page,		7	supervision and direction, and that the	
	if any, a true and correct transcription of my		8	I, the undersigned, a Certified Shorthand Reporter and Notary Public of the State of Iowa, do hereby certify that I acted as the Certified Shorthand Reporter in the foregoing matter at the hme and place indicated herein, that I took in shorthand the proceedings had at said time and place; that said shorthand notes were reduced to typewriting under my supervision and direction, and that the foregoing pages are a full and correct transcript of the shorthand notes so taken, that sard deposition was submitted to the witness for signature as requested and that any changes, if any, requested by the witness are attached hereto.	
9	deposition upon oral examination given at the		9	signature as requested and that any changes, if any, requested by the witness are attached	
	time and place herein stated.		1		
11			1	I further certify that I am neither attorney nor counsel for, or related to or employed by any of the parties in the	
112			12	foregoing matter, and further that I am not a	
13	MARY LOUISE HLAVIN, M.D.		13	foregoing matter, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the action	
.14			15		
15			16	hereunto set my hand and seal this day of	
16	Subscribed and sworn to before me		17		
27	this day of, 1999.		18		
118			19	CERTIFIED SHORTHAND REPORTER and NOTARY PUBLIC	
19			20		
20			21		-
21	Notary Public		22		
122 123	Notary Fublic		23		
24			24 25		
2:5			25		
F		Daga 51			
1	CORRECTION/CHANGE SHEET	Page 51			-
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$					
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	I have read the entire transcript of my deposition taken on the 5th day of January, 1999, or the same has been read to me. I request that the following changes be entered upon the record for the reasons indicated. I				
4	I request that the following changes be entered upon the record for the reasons indicated. I				
5	have signed my name to the signature page and authorize you to attach the same to the original				
6	transcript.				
7	Page Line Correction or change and reason therefor				
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25	Date Signature				

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Mary Louise Hlavin, M.D. January 5,1999

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| 18:20 27:12                                                                                                                                                                                                                                                                                                                                                                                  | 28.13                                                                        | 40:6 50:8                                                                                                                                                                                                                                                                                                                                                   | 52:7                                                                                                                                                   | 42.17                                                                                                                                                                    | 42.19                                                                                                | 43.2                                                                                              | 45:6                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                          | 25:24                                                                                                                                                                                                       |                                                                                           |
| 35:18 38:2                                                                                                                                                                                                                                                                                                                                                                                   | 38:7                                                                         | Correction[1]                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                        | 44:14                                                                                                                                                                    | 44:19                                                                                                | 44:23                                                                                             | discussi                                                                                                                                                                                   | on[2]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 18:1                                                                                                     | either[6]                                                                                                                                                                                                   | 14:7                                                                                      |
| 38:14 41:13                                                                                                                                                                                                                                                                                                                                                                                  | 41:14                                                                        | CORRECTION/C                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                        | 44:25                                                                                                                                                                    | 45:2                                                                                                 |                                                                                                   | 38:10                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                          | 14:23 22:15<br>31:1 36:12                                                                                                                                                                                   | 27:24                                                                                     |
| 41:20 43:1                                                                                                                                                                                                                                                                                                                                                                                   |                                                                              | [1] 51:1                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                        | Decem                                                                                                                                                                    | ber[9]                                                                                               | 26.16                                                                                             | disease                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 15:8                                                                                                     | <b>Elderly</b> [1]                                                                                                                                                                                          | 17.6                                                                                      |
| commencing                                                                                                                                                                                                                                                                                                                                                                                   | 1]                                                                           | <b>corrections</b> [2] 50:7                                                                                                                                                                                                                                                                                                                                 | 14:16                                                                                                                                                  | 27:16                                                                                                                                                                    | 29:21                                                                                                | 30:15                                                                                             | dismisse                                                                                                                                                                                   | ed[2]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 11:15                                                                                                    |                                                                                                                                                                                                             | 17:6                                                                                      |
| 1:13                                                                                                                                                                                                                                                                                                                                                                                         |                                                                              |                                                                                                                                                                                                                                                                                                                                                             | 20.7                                                                                                                                                   | 32:14                                                                                                                                                                    | 32:23                                                                                                | 33:2                                                                                              | 11:23                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 25.11                                                                                                    | electroencephal                                                                                                                                                                                             | ogram                                                                                     |
| comment[1]                                                                                                                                                                                                                                                                                                                                                                                   | 46:4                                                                         | cough <sub>[1]</sub>                                                                                                                                                                                                                                                                                                                                        | 28:7                                                                                                                                                   | 33:5                                                                                                                                                                     | 34:17                                                                                                | 4.10                                                                                              | <b>disorder</b> 36:14                                                                                                                                                                      | [2]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 35:11                                                                                                    | emergency[1]                                                                                                                                                                                                |                                                                                           |
| Common [2]                                                                                                                                                                                                                                                                                                                                                                                   | 1:1                                                                          | <b>counsel</b> [17]<br>4:14 4:18                                                                                                                                                                                                                                                                                                                            | 4:9<br>8:24                                                                                                                                            | defects                                                                                                                                                                  |                                                                                                      | 4:19                                                                                              | distinct                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 34:11                                                                                                    | employed [3]                                                                                                                                                                                                | 5:13                                                                                      |
| 24:21                                                                                                                                                                                                                                                                                                                                                                                        | . 11.00                                                                      | 9:2 9:5                                                                                                                                                                                                                                                                                                                                                     | 8.24<br>9:10                                                                                                                                           | defend:<br>7:19                                                                                                                                                          | ant [9]<br>7:23                                                                                      | 4:7<br>8:4                                                                                        | distribut                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                          | 52:12 52:13                                                                                                                                                                                                 | 515                                                                                       |
| complained [1]                                                                                                                                                                                                                                                                                                                                                                               |                                                                              | 19:11 39:6                                                                                                                                                                                                                                                                                                                                                  | 39:8                                                                                                                                                   | 9 16                                                                                                                                                                     | 9.20                                                                                                 | 8:4<br>13:21                                                                                      | divorced                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                          | employee <sup>[2]</sup>                                                                                                                                                                                     | 6:4                                                                                       |
| complete[2]                                                                                                                                                                                                                                                                                                                                                                                  | 19:5                                                                         | 45:18 45:24                                                                                                                                                                                                                                                                                                                                                 | 47:3                                                                                                                                                   | 46:7                                                                                                                                                                     | 46:16                                                                                                | * <b>*</b> ** *                                                                                   | 1                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 16:19                                                                                                    | 52.13                                                                                                                                                                                                       | 511                                                                                       |
| 48:19<br>completed[1]                                                                                                                                                                                                                                                                                                                                                                        | 21.17                                                                        | 47:25 49:1                                                                                                                                                                                                                                                                                                                                                  | 52:11                                                                                                                                                  | Defend                                                                                                                                                                   |                                                                                                      | 1:7                                                                                               | doctor[3:<br>7:13 9                                                                                                                                                                        | 5]<br>9:15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4:8<br>10:12                                                                                             | employment [1                                                                                                                                                                                               | 1                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                              |                                                                              | 52:13                                                                                                                                                                                                                                                                                                                                                       | 6.00                                                                                                                                                   | defense                                                                                                                                                                  |                                                                                                      | 45:23                                                                                             |                                                                                                                                                                                            | 2:9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 14:2                                                                                                     | 7:8                                                                                                                                                                                                         | -                                                                                         |
| complication                                                                                                                                                                                                                                                                                                                                                                                 | լդ                                                                           | counting[1]                                                                                                                                                                                                                                                                                                                                                 | 6:20                                                                                                                                                   | defer [2]                                                                                                                                                                |                                                                                                      | 47:23                                                                                             | 14:8 1                                                                                                                                                                                     | 5:6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16:1                                                                                                     | encouraged[1]                                                                                                                                                                                               | 37:10                                                                                     |
| complication                                                                                                                                                                                                                                                                                                                                                                                 | ST11                                                                         | County <sup>[3]</sup><br>39:1 39:12                                                                                                                                                                                                                                                                                                                         | 1:1                                                                                                                                                    | deferre                                                                                                                                                                  | -                                                                                                    | 35:16                                                                                             |                                                                                                                                                                                            | 8:8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 19:19                                                                                                    | end [1] 31:6                                                                                                                                                                                                |                                                                                           |
| 21:9                                                                                                                                                                                                                                                                                                                                                                                         | afr]                                                                         |                                                                                                                                                                                                                                                                                                                                                             | 10.1                                                                                                                                                   | deficit                                                                                                                                                                  |                                                                                                      | 24:11                                                                                             |                                                                                                                                                                                            | 2:3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 22:18                                                                                                    | enhancement                                                                                                                                                                                                 | 1]                                                                                        |
| composed[1]                                                                                                                                                                                                                                                                                                                                                                                  | 6:11                                                                         | course[1]                                                                                                                                                                                                                                                                                                                                                   | 48:1                                                                                                                                                   | 38:20                                                                                                                                                                    |                                                                                                      |                                                                                                   |                                                                                                                                                                                            | 8:19<br>2:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 29:8<br>33:4                                                                                             | 34:8                                                                                                                                                                                                        |                                                                                           |
| concerned[3]                                                                                                                                                                                                                                                                                                                                                                                 | 36:5                                                                         | <b>court</b> [6] 1:1<br>4:17 5:4                                                                                                                                                                                                                                                                                                                            | 4:13<br>8:19                                                                                                                                           | departr                                                                                                                                                                  | nentisi                                                                                              | 6:1                                                                                               |                                                                                                                                                                                            | 6:23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 38:23                                                                                                    | enter[1] 9:3                                                                                                                                                                                                |                                                                                           |
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| concluded[1]                                                                                                                                                                                                                                                                                                                                                                                 | 48:17                                                                        | covers <sup>[1]</sup>                                                                                                                                                                                                                                                                                                                                       | 23:10                                                                                                                                                  | deposit                                                                                                                                                                  | t <b>ion</b> [31]                                                                                    |                                                                                                   | 44:11 4                                                                                                                                                                                    | 5:6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 45:15                                                                                                    | entire <sup>[1]</sup>                                                                                                                                                                                       | 51:2                                                                                      |
| condition[1]                                                                                                                                                                                                                                                                                                                                                                                 | 25:2                                                                         | cranial [1]                                                                                                                                                                                                                                                                                                                                                 | 42:11                                                                                                                                                  | 1:10                                                                                                                                                                     | 4:6                                                                                                  | 4:10                                                                                              |                                                                                                                                                                                            | 8:3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 48:8                                                                                                     | entities [1]                                                                                                                                                                                                | 6:23                                                                                      |
| conferencing                                                                                                                                                                                                                                                                                                                                                                                 |                                                                              | critical <sup>[1]</sup>                                                                                                                                                                                                                                                                                                                                     | 45:3                                                                                                                                                   | 4:12                                                                                                                                                                     | 4:15                                                                                                 | 7:12                                                                                              | 48:14                                                                                                                                                                                      | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 20.11                                                                                                    | entity [1]                                                                                                                                                                                                  | 7:4                                                                                       |
| 4:15                                                                                                                                                                                                                                                                                                                                                                                         | <b>.</b> *1                                                                  |                                                                                                                                                                                                                                                                                                                                                             | 43.3<br>46:20                                                                                                                                          | 7:18<br>8:7                                                                                                                                                              | 7:22<br>9:2                                                                                          | 8:1                                                                                               | documer                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 30:11                                                                                                    | epidural [1]                                                                                                                                                                                                | 14:1                                                                                      |
| consciousnes                                                                                                                                                                                                                                                                                                                                                                                 | <b>S</b> [1]                                                                 | CROSS-EXAMIN                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                        | 13:16                                                                                                                                                                    | 9:2<br>18:10                                                                                         | 9:3<br>19:9                                                                                       | doesn't <sub>[</sub>                                                                                                                                                                       | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 46:9                                                                                                     | episode [5]                                                                                                                                                                                                 | 28:6                                                                                      |
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| consent <sub>[2]</sub>                                                                                                                                                                                                                                                                                                                                                                       | 11:2                                                                         | <b>CT</b> [2] 33:7                                                                                                                                                                                                                                                                                                                                          | 42:12                                                                                                                                                  | 47:8                                                                                                                                                                     | 48:1                                                                                                 | 48:17                                                                                             |                                                                                                                                                                                            | 4:3<br>3:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 41:11                                                                                                    | 29:15                                                                                                                                                                                                       |                                                                                           |
| 11:9                                                                                                                                                                                                                                                                                                                                                                                         |                                                                              | cure [1] 26:3                                                                                                                                                                                                                                                                                                                                               | 74.16                                                                                                                                                  | 48:19                                                                                                                                                                    | 48:20                                                                                                | 48:22                                                                                             | <b>down</b> [5]                                                                                                                                                                            | 1.19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 8:20                                                                                                     | episodes [5]                                                                                                                                                                                                | 27:25                                                                                     |
| consider[3]                                                                                                                                                                                                                                                                                                                                                                                  | 22:5                                                                         |                                                                                                                                                                                                                                                                                                                                                             | 26:7                                                                                                                                                   | 49:2<br>50:9                                                                                                                                                             | 49:3<br>51:3                                                                                         | 50:4<br>52:8                                                                                      |                                                                                                                                                                                            | 29:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 36:24                                                                                                    | 28:17 29:9                                                                                                                                                                                                  | 35:6                                                                                      |
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| considered[1]                                                                                                                                                                                                                                                                                                                                                                                |                                                                              |                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                        | desatur                                                                                                                                                                  |                                                                                                      |                                                                                                   | dozen [2]                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7:16                                                                                                     | <b>et</b> [1] 1:6                                                                                                                                                                                           |                                                                                           |
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| contained [1]                                                                                                                                                                                                                                                                                                                                                                                | 19:4                                                                         | 17:1                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                        | describ                                                                                                                                                                  |                                                                                                      | 23:3                                                                                              |                                                                                                                                                                                            | 1:6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 5:3                                                                                                      | etiology [1]                                                                                                                                                                                                | 26:6                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                              |                                                                              |                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                        | 1 MODELIN                                                                                                                                                                |                                                                                                      |                                                                                                   | 18:20 2                                                                                                                                                                                    | 16.04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 26:25                                                                                                    | Euclid [2]                                                                                                                                                                                                  | 0 10                                                                                      |
| continue <sup>[3]</sup>                                                                                                                                                                                                                                                                                                                                                                      | 45:20                                                                        | cut [2] 6:18                                                                                                                                                                                                                                                                                                                                                | 12:24                                                                                                                                                  | describ                                                                                                                                                                  | edm                                                                                                  | 28.16                                                                                             | 10.20 2                                                                                                                                                                                    | 26:24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                          |                                                                                                                                                                                                             | 2:12                                                                                      |
| <b>continue</b> [3]<br>47:4 47:8                                                                                                                                                                                                                                                                                                                                                             |                                                                              |                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                        | describ<br>descrip                                                                                                                                                       |                                                                                                      | 28:16<br>29:14                                                                                    | 27:5 2                                                                                                                                                                                     | 27:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 28:13                                                                                                    | 6:2                                                                                                                                                                                                         |                                                                                           |
| <b>continue</b> [3]<br>47:4 47:8<br><b>continuing</b> [3]                                                                                                                                                                                                                                                                                                                                    |                                                                              | <b>Cuthbertson</b> [<br>2:14 4:22                                                                                                                                                                                                                                                                                                                           | 1 <b>5]</b><br>10:13                                                                                                                                   | describ<br>descrip<br>29:15                                                                                                                                              |                                                                                                      |                                                                                                   | 27:5 2<br>28:13 3                                                                                                                                                                          | 27:12<br>10:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 28:13<br>31:8                                                                                            | 6:2<br>evaluated[1]                                                                                                                                                                                         | 30:1                                                                                      |
| continue[3]           47:4         47:8           continuing[3]         10:22           10:22         10:24                                                                                                                                                                                                                                                                                  | 9:22                                                                         | Cuthbertson [<br>2:14 4:22<br>10:14 10:21                                                                                                                                                                                                                                                                                                                   | 15]<br>10:13<br>39:24                                                                                                                                  | <b>descrip</b> 29:15                                                                                                                                                     | tion[2]                                                                                              | 29:14                                                                                             | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3                                                                                                                                                    | 27:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 28:13<br>31:8<br>35:18<br>38:2                                                                           | 6:2<br>evaluated[1]<br>evaluation[5]                                                                                                                                                                        | 30:1<br>28:14                                                                             |
| continue[3]           47:4         47:8           continuing[3]         10:22         10:24           contrast[1]         10         10                                                                                                                                                                                                                                                      | 9:22<br>11:8                                                                 | Cuthbertson           2:14         4:22           10:14         10:21           39.25         40:19                                                                                                                                                                                                                                                         | 15]<br>10:13<br>39:24<br>40:20                                                                                                                         | descrip                                                                                                                                                                  | tion[2]                                                                                              | 29:14                                                                                             | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3                                                                                                                                          | 27:12<br>10:13<br>15:16<br>16:3<br>18:3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 28:13<br>31:8<br>35:18<br>38:2<br>38:6                                                                   | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4                                                                                                                                                          | 30:1                                                                                      |
| continue[3]           47:4         47:8           continuing[3]         10:22         10:24           contrast[1]         contraste[3]                                                                                                                                                                                                                                                       | 9:22<br>11:8                                                                 | Cuthbertson           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13                                                                                                                                                                                                                           | 15]<br>10:13<br>39:24<br>40:20<br>43:25                                                                                                                | descrip<br>29:15<br>DESTE                                                                                                                                                | otion[2]<br>ROYEI                                                                                    | 29:14                                                                                             | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3<br>38:7 3                                                                                                                                | 27:12<br>10:13<br>15:16<br>16:3<br>18:3<br>18:11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14                                                          | 6:2<br>evaluated [1]<br>evaluation [5]<br>29:23 31:4<br>31:23                                                                                                                                               | 30:1<br>28:14<br>31:18                                                                    |
| continue[3]           47:4         47:8           continuing[3]         10:22         10:24           contrast[1]         contrasted[3]         33:25         34:7                                                                                                                                                                                                                           | 9:22<br>11:8<br>33:21                                                        | Cuthbertson         [           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13           44:1         47:11                                                                                                                                                                                    | 15]<br>10:13<br>39:24<br>40:20<br>43:25<br>47:11                                                                                                       | <b>descrip</b><br>29:15<br><b>DESTF</b><br>49:2                                                                                                                          | etion <sup>[2]</sup><br>ROYEI                                                                        | 29:14<br><b>D[1]</b>                                                                              | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3<br>38:7 3<br>41:13 4                                                                                                                     | 27:12<br>30:13<br>35:16<br>36:3<br>38:3<br>38:11<br>41:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14<br>41:20                                                 | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4<br>31:23<br>everything[1]                                                                                                                                | 30:1<br>28:14<br>31:18<br>45:13                                                           |
| continue[3]           47:4         47:8           continuing[3]           10:22         10:24           contrast[1]           contrasted [3]           33:25         34:7           contributed [1]                                                                                                                                                                                          | 9:22<br>11:8<br>33:21<br>45:1                                                | Cuthbertson [           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13           44:1         47:11           cutting [1]                                                                                                                                                                      | 15]<br>10:13<br>39:24<br>40:20<br>43:25<br>47:11<br>21:18                                                                                              | descrip<br>29:15<br>DESTE<br>49:2<br>detailin                                                                                                                            | tion[2]<br>ROYEI<br>ng[1]<br>se[1]                                                                   | 29:14<br><b>D</b> [1]<br>35:24<br>13:25                                                           | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3<br>38:7 3<br>41:13 4<br>43:1 4                                                                                                           | 27:12<br>30:13<br>35:16<br>36:3<br>38:3<br>38:11<br>41:14<br>3:1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14<br>41:20<br>43:1                                         | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4<br>31:23<br>everything[1]<br>evidence[1]                                                                                                                 | 30:1<br>28:14<br>31:18<br>45:13<br>39:12                                                  |
| continue[3]           47:4         47:8           continuing[3]         10:22           10:22         10:24           contrast[1]         contrasted [3]           33:25         34:7           contributed[1]         contributed[1]                                                                                                                                                        | 9:22<br>11:8<br>33:21<br>45:1<br>44:18                                       | Cuthbertson [           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13           44:1         47:11           cutting[1]         Cuyahoga[3]                                                                                                                                                   | 15]<br>10:13<br>39:24<br>40:20<br>43:25<br>47:11                                                                                                       | descrip<br>29:15<br>DESTF<br>49:2<br>detailin<br>diagnos                                                                                                                 | tion[2]<br>ROYEI<br>ng[1]<br>se[1]                                                                   | 29:14<br><b>D</b> [1]<br>35:24                                                                    | 27:5       2         28:13       3         32:13       3         35:24       3         38:2       3         38:7       3         41:13       4         43:1       4         46:4       4   | 27:12<br>30:13<br>35:16<br>36:3<br>38:3<br>38:11<br>41:14<br>43:1<br>47:15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14<br>41:20<br>43:1<br>47:16                                | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4<br>31:23<br>everything[1]<br>evidence[1]<br>ex-husband[1]                                                                                                | 30:1<br>28:14<br>31:18<br>45:13<br>39:12<br>16:19                                         |
| continue [3]           47:4         47:8           continuing [3]         10:22         10:24           contrast [1]         contrasted [3]         33:25         34:7           contributed [1]         contributed [1]         contributed [1]                                                                                                                                             | 9:22<br>11:8<br>33:21<br>45:1                                                | Cuthbertson [           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13           44:1         47:11           cutting[1]         Cuyahoga[3]           39:1         39:11                                                                                                                      | 15]<br>10:13<br>39:24<br>40:20<br>43:25<br>47:11<br>21:18<br>1:1                                                                                       | descrip<br>29:15<br>DESTE<br>49:2<br>detailin<br>diagnos<br>diagno                                                                                                       | tion[2]<br>ROYEI<br>ng[1]<br>se[1]<br>sis[2]                                                         | 29:14<br><b>D</b> [1]<br>35:24<br>13:25                                                           | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3<br>38:7 3<br>41:13 4<br>43:1 4<br>46:4 4<br><b>drinking</b>                                                                              | 27:12<br>30:13<br>35:16<br>66:3<br>98:3<br>98:11<br>41:14<br>43:1<br>47:15<br>5[1]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14<br>41:20<br>43:1<br>47:16<br>28:6                        | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4<br>31:23<br>everything[1]<br>evidence[1]<br>ex-husband[1]<br>exact[2]                                                                                    | 30:1<br>28:14<br>31:18<br>45:13<br>39:12                                                  |
| continue [3]           47:4         47:8           continuing [3]         10:22         10:24           contrast [1]         contrasted [3]         33:25         34:7           contributed [1]         contributed [1]         contributed [1]           control [2]         40:25         40:25                                                                                           | 9:22<br>11:8<br>33:21<br>45:1<br>44:18<br>40:16                              | Cuthbertson [           2:14         4:22           10:14         10:21           39.25         40:19           43:12         43:13           44:1         47:11           cutting[1]         Cuyahoga[3]                                                                                                                                                   | 15]<br>10:13<br>39:24<br>40:20<br>43:25<br>47:11<br>21:18                                                                                              | descrip<br>29:15<br>DESTE<br>49:2<br>detailin<br>diagno<br>35:8<br>diagno<br>30:21                                                                                       | tion[2]       ROYEI       ng[1]       se[1]       sis[2]       stic[6]       31:3                    | 29:14<br><b>D</b> [1]<br>35:24<br>13:25<br>33:2                                                   | 27:5 2<br>28:13 3<br>32:13 3<br>35:24 3<br>38:2 3<br>38:7 3<br>41:13 4<br>43:1 4<br>46:4 4<br>drinking<br>dropped                                                                          | 27:12<br>30:13<br>35:16<br>66:3<br>98:3<br>98:11<br>41:14<br>43:1<br>47:15<br>5[1]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 28:13<br>31:8<br>35:18<br>38:2<br>38:6<br>38:14<br>41:20<br>43:1<br>47:16                                | 6:2<br>evaluated[1]<br>evaluation[5]<br>29:23 31:4<br>31:23<br>everything[1]<br>evidence[1]<br>ex-husband[1]<br>exact[2]<br>13:16                                                                           | 30:1<br>28:14<br>31:18<br>45:13<br>39:12<br>16:19<br>9:24                                 |
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