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1	IN THE COURT OF COMMON PLEAS
2	CUYAHOGA COUNTY, OHIO
3	DIANE M. CARRICK, DOC. 332 EXECUTRIX, etc.,
4	
5	Plaintiff, JUDGE J. ICILCOYNE
6	-vs- <u>CASE NO. 185330</u>
7	THE CLEVELAND CLINIC FOUNDATION, et al.,
8	Defendants.
9	
10	Deposition of <u>SATORU NARAMOTO, M.D</u> ., taken as
11	if upon cross-examination before Susan M.
12	Cebron, a Registered Professional Reporter and
13	Notary Public within and for the State of Ohio,
14	at the Cleveland Clinic Foundation, 9500 Euclid
15	Avenue, Cleveland, Ohio, at 11:20 a.m. on
16	Tuesday, November 20, 1990, pursuant to notice
17	and/or stipulations of counsel, on behalf of the
18	Plaintiff in this cause.
19	
20	
21	MEHLER & HAGESTROM Court Reporters
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## APPEARANCES:

	<u>APPEARANCES</u> :
2	
3	Charles I. Rampinski, Esq. Charles I. Kampinski Co., L.P.A. 1530 Standard Building
4	Cleveland, Ohio 44113 (216) 781-4110,
5	On behalf of the Plaintiff;
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10	On behalf of the Defendants Robert P. Riley, M.D. and Nazih M. Zein, M.D.;
11	James L. McCrystal, Jr., Esq.
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14	On behalf of the Defendant
15	Lakewood Hospital Association;
16	George F. Gore, Esq. Arter & Hadden
17	1100 Huntington Building Cleveland, Ohio 44115
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19	On behalf of the Defendant The Cleveland Clinic Foundation.
20	
21	ALSO PRESENT:
22	Gwen Holler
23	
24	
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1 SATORU NAKAMOTO, M.D., of lawful age, called by the Plaintiff for the purpose of 2 cross-examination, as provided by the Rules of 3 Civil Procedure, being by me first duly sworn, 4 5 as hereinafter certified, deposed and said as 6 follows: 7 CROSS-EXAMINATION OF SATORU NAKAMOTO, M.D. 8 BY MR. KAMPINSKI: Would you state your full name, doctor? 9 0. Satoru Nakamoto. 10 Α. You're going to have to spell that, please. 11 Q. 12 Α. S A T O R U, that is my first name. Last name is NAKAMOTO. 13 Doctor, I am going to ask you a number of 14 0. 15 questions this morning. If you don't understand any question I ask you tell me, I'll be happy to 16 17 rephrase it for you, All right. 18 Α. 19 0. When you answer my questions do so slowly so she can take down everything you say and do so 20 verbally, all right? She's can't take down a 21 22 nod of your head, okay? 23 Α. I'll try. 24 Q. Okay. Doctor, you've got some notes in front of 25 you.

Α. Yes. 1 2 0. What are those? 3 Oh, those are the notes when I reviewed part of Α. these medical record and I put down to what I 4 provided, that's my testimony. 5 When did you make those notes? 6 **a** . 7 Yesterday. Α. All right. So you went through the chart a Q . yesterday? 9 No, only part of it, not from page to page, only 10 Α. 11 part of what I thought I was involved in the 12 case. Could I see that, please? 13 Okay. Q. 14 Α. Sure. Please. 15 They are just dates and certain numbers, 16 just to make sure I am not guessing at numbers. 17 MR. KAMPINSKI: Will you make us a 18 copy of this? 19 MR. GORE: Sure. I can't here, 20 but I will later. 21 Doctor, when did you get involved in the Q. 22 treatment of Mr. Carriclc? 23 On February 12, 1980 -- I'm sorry, April, I'm Α. 24 sorry. 25 No. April 12th, 1980, the day after he had

		5
1		operation.
2	Q.	And when you say operation, you are talking
3		about the parathyroidectomy?
4	Α.	That is correct.
5	Q .	You had never seen him before?
6	Α.	Never.
7	Q .	Had you ever consulted with anybody regarding
8		his condition before?
9	Α.	Never.
10	Q.	When you got involved with him on April 12th,
11		1989 what was the reason that you got involved?
12	Α.	Well, at that time I was what we call hospital
13		service. In other words, in our department two
14		doctors from the department are assigned to
15		hospital service for at that time four weeks,
16		and everybody takes a rotation, and when this
17		patient came in the hospital I was or happened
18		to be assigned to the hospital.
19		So then those two doctors do take care of
20		all of our admission patients from our
2 1		department.
22	Q .	When you say your department, are we talking
23		about
24	Α,	Hypertension and nephrology.
25	Q.	Okay,

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1	Α.	And all the consultations from other
2		specialities.
3	Q.	All right. I'm sorry.
4	Α.	So then sometime I may see a patient as an
5		outpatient. Then a patient may come in the
6		hospital two weeks later and I am the attending
7		for him, but if I am not on the hospital service
8		then my associates will take over the care in
9		the hospital.
10	Q.	I see. So the fact that Dr. Heyka had seen Mr.
11		Carrick on a previous admission didn't
12		necessarily mean that he was going to see him at
13		this admission?
14	Α.	That is correct. In other words, sometime,
15		indeed, I may see the patient two weeks before
16		his admission. I happen to be on hospital
17		service, then I will see this patient.
18	Q.	I got you,
19	Α.	Otherwise after four weeks it would be whoever
20		is on rotation. Now, if patient stay off of my
21		service, then another doctor, my associate will
22		take over even though I probably saw the patient
23		first before admission, but last half maybe
24		transferred to some other doctor.
25	Q.	Who was the other physician from your department

1		who was
2	Α.	I cannot remember.
3	Q.	All right. Presumedly it would have been Dr.
4		Heyka, probably, he probably would have seen
5		him?
6	Α.	That's right. In other words, whoever .is the
7		primary service, that doctor happened to be in
8		the hospital, obviously he would go to that
9		service.
10	Q.	Did you then become the attending physician once
11		the surgery was completed?
12	Α.	Well, no. The decision of the surgery,
13		operation itself and the post-care after surgery
14		are the primary responsibility of a surgeon, and
15		I'm just as a secondary service, just for
16		whatever I think, you know, appropriate
17		procedure should be taken, and I may discuss
18		with the surgeon, but the surgeon is the primary
19		responsibility.
20	Q.	So he remained the attending then throughout the
21		remainder
22	Α.	Primary responsibility is the surgeon, no
23		question about it.
24	Q.	When you got involved in Mr. Carrick's care
25		because you were on the hospital service did you

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then review his records? 1 2 Α. Yes. 3 Ο. Did you review the records from --4 Well, you -- go ahead. Α. Did you review his records from Lakewood 5 Q . 6 Hospital? No, no.. I didn't. 7 Α. Did you review Dr. Riley's records? 8 Q. 9 MR. GORE: You have to say something out loud. 10 11 I'm sorry. I did not. I did not, you know, Α. 12 review Dr. Riley's either. Have you ever reviewed them? 13 Ο, 14 Α. Never. 15 All right. Have you ever reviewed the Lakewood Q. 16 Hospital records? 17 Α. Never. 18 Q. Have you --19 Α. See, the reason for --20 MR. GORE: Just answer the 21 question, doctor. 22 Go ahead. You can explain why you didn't. Ο. Well, because Dr. Heyka is, you know, is a well 23 Α. 24 qualified nephrologist and associate and that is 25 his decision, and he called the surgeon and then

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1		they decide to go ahead with the operation, and
2		this is the best way to go.
3	Q.	Well, yes. My question though is, when you took
4		over his care, I mean, did you make an effort to
5		become acquainted with his history?
6	Α.	Oh, yes.
7	Q.	Which would have included the
8	Α.	Operation and chemistry, yes.
9	Q.	No.
10		MR. GORE: bet him finish the
11		question, doctor.
12	Q.	which would have included his history before
13		coming to the Clinic at Lakewood Hospital and
14		his treatment with his physician before that
15		time, Dr. Riley?
16	Α.	No. But I did not do that from a page to page.
17		The reason for that is whatever complication
18		developed after the operation was really not
19		much I could do from what already is done. So I
20		sort of, the best way to do is to treat the best
21		what I can do after I took over.
22	Q.	Okay. What complications after surgery are you
23		talking about?
24	Α.	I think an. infection was probably number one and
25		probably he died of it, although there is no

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1 So we cannot really tell you exactly autopsy. 2 what happened. There are some many mysteries, there is no autopsy. 3 Well, he had sepsis, didn't he? 4 Q. 5 Α. Yes. And who was treating him for that? 6 Ο. Α. That was, I reviewed that part because I was 7 involved. So then over here, April 14th we did 8 9 the dialysis. Then April 15th, also, we did a second dialysis. Then he became quite ill, and 10 according to my chart I said this is most likely 11 sepsis. So temporarily we started antibiotics 12 and we promptly called an infectious 13 consultation. 14 15 However, he became so ill that we could not 16 provide appropriate care on the regular hospital ward. So he was transferred to surgical 17 intensive care unit. 18 Would you have continued --19 Q. Now, when they send a transfer to any intensive 20 Α. 21 care unit in this hospital, and probably other 22 hospitals as well, the entire care of that 23 patient will be up to the intensive care 24 specialist because they know the best. So then 25 we still follow and provide dialysis treatment,

		11
1		but the rest is all in the hands of the
2		intensive care specialist.
3	Q.	Well, why did you start dialysis, doctor, on
4		April 14th?
5	Α.	Well, April 14th he became ill despite of
6		medical intervention after the operation, and he
7		had evidence of a hyponatremia.
8	Q.	I'm sorry?
9	A.	Hypo, hyponatremia.
10	Q.	That means
11	A.	That means Low sodium concentration.
12		MR. GORE: Hyponatremia.
13	A.	Sodium concentration was low, and he had a high
14		BUN, in other words, you know, evidence of renal
15		failure.
16	Q.	How high was the BUN?
17	Α.	Let's see. It was 200.
18	Q.	And that's pretty high, isn't it, doctor?
19	Α.	Yes, that is.
20	Q.	And is that an indication to do dialysis when
21		you have a RUN that high?
22	Α.	Well, BUN itself is a not absolute indication
23		for the dialysis, but it would help with the
24		decision of dialysis.
25	Q.	Okay. What else?

1	Α.	And, of course, he had metabolic acidosis,
2	Q.	And how could you tell that?
3	A.	Manifested by the low sodium I mean low
4		bicarbonate concentration, which was according
5		to this it was 10.6. Normal is about 24.
6	Q.	Anything else?
7	Α.	Those three, and the excess fluid we wanted to
8		take out by dialysis.
9	Q.	And dialysis would provide a means of what?
10	A.	Well, dialysis
11		MR. GORE: Let him finish the
12		question, doctor, and then you can answer.
13		MR. RAMPINSRI: I was finished.
14		MR. GORE: Oh. You were?
15	Α.	I was ready to answer, I suppose.
16		MR. GORE: Fine.
17	A.	Well, dialysis for a chemist is maybe separation
18		of the chemical from a solution, the art of
19		separating, maybe that was dialysis.
20		But for a physician it would be the removal
21		or purifying blood by means of artificial
22		kidney. So then whatever the excess molecule in
23		the blood goes through the pores of a membrane,
24		and then it will come out of something like a
25		high concentration going down to the lower

concentration outside of a membrane, and so then 1 the dialysis really does not cure any disease. 2 I think that is a misconception of most 3 people. Dialysis is just gaining of time, wash 4 out the poison but don't produce any new 5 tissue. If somebody have a bacterial infection 6 7 in the bloodstream, dialysis will not take out the bacteria. It is too big to go through that 8 hole, but just for gaining of time. 9 But fortunately for somebody that has only 10 kidney problem, the waste products, then 11 dialysis is a life safer, and we have hundreds 12 13 of patients in this country that live on 14 dialysis. Do you have any opinion, doctor, as to whether 15 Q. 16 or not Mr. Carriclc should have had dialysis 17 before his surgery? 18 Well, I'm not an expert witness, so I do not Α. 19 want to -- that should be answered by Dr. Heyka. 20 But I am asking you. You have reviewed the Q. records. I'm asking you if, in your opinion, 21 22 Mr. Carriclc should have had dialysis before 23 undergoing surgery? 24 Yes. Sometime even with the BUN on this patient Α. 25 we may use dialysis if we see that another

indication is there. So then in this case 1 probably dialysis was not needed then before the 2 operation. 3 Now, after the operation and complication 4 developed, two or three factors is important, 5 not only BUN, so we started dialysis. 6 7 But I have to tell you, when I went to his room on the 14th, that was April 14th, I told 8 the patient and his family, I think three ladies 9 were there, I am really not sure whether it was 10 his mother or mother-in-law, and probably the 11 12 patient's sister and probably his wife, they are 13 so much upset against the dialysis. They said 14 you are not my doctor, Dr. Heyka is the doctor, 15 I said that's right. 16 So I explained to them what the possible 17 complication if we don't do the dialysis today. So I called in Dr. Heyka and the family 18 discussed about it. I don't know what the 19 discussion went on. 2.0 21 So then I think if I remember correctly April 14th first dialysis, we did it rather in 22 23 late afternoon or early evening. We usually

25 morning to early afternoon. So family were very

decide what we are going to do sometime early

		15
1		much against the dialysis.
2	Q.	But when you recommended that they do it they
3	~	did it?
4	А.	Yes. I think I wrote down the situation that I
	А.	
5		explained to the patient and the family.
6	Q.	Sure. There was no recommendation to do
7		dialysis by Dr. Heyka before the surgery, was
8		there?
9	Α.	Obviously not. I mean, I was not involved. So
10		I cannot say, but I did not go through page by
11		page. So I cannot tell you whether he
12		recommended. But all I know is that the family
13		was very much upset about dialysis,
14	Q.	You said that with the increased BUN and other
15		indications dialysis would be appropriate. What
16		other indications?
17	Α.	Well, as I told you, the hyponatremia and the
18		metabolic acidosis, and the excess water, plus
19		BUN.
20	Q.	So you need all of those to
21	А.	No, not necessarily. Sometimes we do that only
2 2		for the water because of a kidney problem,
23		drinking a lot of water, everything is okay, but
24		just take the water out. So every individual
2 5		patient is in a different way.

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		16
1	Q.	What's what effect does Indocin have on
2	~	someone with kidney problems?
3	Α.	Well, I'm really not sure I should answer that
4		question.
5		MR. GORE: If you have an answer,
6		doctor, go ahead.
7	Α.	You know, I mean, I am not involved in this area
8		of patient care. Of course, Indocin can damage
9		the kidney.
10	Q.	Doctor, with somebody who has kidney problems,
11		is it inappropriate for a physician to prescribe
12		Indocin for a period in excess of 10 years, in
13		your opinion
14		MR. FIFNER: Objection.
15	Q.	to a reasonable degree of medical certainty?
16		MR. FIFNER: Objection.
17		MR. GORE: He is objecting for the
18		record, doctor. You can go ahead and answer the
19		question, doctor, if you have an answer.
20	Α.	It's a difficult question to answer. If I was a
21		physician, I will. follow the kidney function
22		very carefully, and if that's the only medicine
23		that helps the patient. Sometimes, you know, a
24		group of medicine may not help and in the
25		instance of 15, 20 people are treatable. Some

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1 patients it helps, and in that case I try to 2 use, you know, say some other medicine first, and if that does not work, then I will probably 3 4 try it. But as I say, I will follow the kidney 5 function very carefully, and if there is any 6 7 evidence of damage to the kidney, then that is 8 more important than whatever the Indocin is 9 treating, then I will discontinue. It's a, you know --10 11 If a BUN was rising throughout the time that you 0. 12 were providing such a drug --13 Yes, But BUN itself is really not a thorough Α. 14 indication of a renal €unction. How about creatinine? 15 0. Creatinine is again, creatinine, anybody can 16 Α. form creatinine in the muscle. So if somebody 17 18 have a wasting of muscle, then creatinine may be better. It might be a misreading. 19 It's a very difficult question. 20 21 So I have to see the patient, you know, but 2.2 the BUN and the creatinine are usually 23 considered indications of a kidney problem. You 24 have to do what they call an infiltration rate, 25 but that's a very cumbersome task.

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		18
1	Q.	If a physician
2	Α.	I will not do that everytime a patient comes
3		into my office.
4	Q.	You're a nephrologist, right?
5	Α.	Yes, I'm a nephrologist.
6	Q.	Is that the appropriate specialty for somebody
7		who has kidney problems?
a	Α.	Indocin?
9	Q.	No, no. Is a nephrologist the appropriate
10		person, physician who should be seeing a patient
11		who has kidney failure?
12	Α.	Yes. It is definitely appropriate. But a large
13		number of patients are followed by what they
14		call an internist, I'm sure.
15	Q.	I'm sure, too. And if, in fact, someone is
16		showing progressive kidney failure, and a
17		physician who is not a nephrologist is treating
18		him with a toxin such as Indocin, which is
19		according to the PDR contraindicated when used
20		in conjunction with somebody having kidney
21		failure, should that physician get a consult, in
22		your opinion, from a nephrologist before doing
23		that
24		MR. FIFNER: Objection.
25	Q.	or while continuing to do that

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		19
1		MR. FIFNER: Objection. Objection
2		to the form.
3	Q.	<pre> to a reasonable degree of medical certainty?</pre>
4		MR. FIFNER: Same objection.
5		MR. GORE: Do you understand the
6		question, doctor?
7	Α.	I understand the question, but I think this is
8		something that I am going against somebody as an
9		expert witness. I don't want to be in that
10		position, you know.
11		I will do it, but I provided only about, we
12		performed the service, and I, because I am not
13		an expert witness, I don't think it is really
14		appropriate maybe to discuss, but I was not even
15		involved. If the physician ask me to see the
16		patient for the first
17	Q.	Do you know Riley?
18	Α.	I know him very well.
19	Q.	How do you know him?
20	Α.	He was trained over here and he probably was
21		maybe one of my students a short time. He
22		started dialysis, yes.
23	Q.	He's not a nephrologist, is he?
24	Α.	Well, nephrologist is the only definition of
25		having a board. I don't know if he has a board

1		in nephrology or not. I have no idea.
2	Q.	Have you talked to him about this case?
3	Α.	No, not at all. None of my business. I see no
4		reason why I have to discuss.
5	Q.	Did you talk to him at the time that you treated
6		Mr. Carricle?
7	Α.	No. As I said, the primary care was provided by
8		Dr. Broughan and the surgeon and Dr. Heyka was
9		involved. So I see no reason why I had to. But
10		if, of course, he died under my ward, not in the
11		intensive care unit, then, of course, I would
12		tell him what happened, but that is the end of
13		my
14	Q .	But that didn't happen?
15	Α.	Because like I say, he died in the intensive
16		care unit. So then I assume the intensive care
17		specialist or Dr. Heyka or Dr. Broughan maybe
18		speak to him.
19	Q .	Has Dr. Riley referred patients to you in the
20		past?
21	Α.	I think recently he had the past, yes, very
22		small number, because he's almost the same kind,
23		you know, in speciality, so really
24	Q.	How recently?
25	Α.	I can't give you

		21
1	Q.	I mean, are we talking about in the last year?
2	Α.	Oh, no, no. I think probably last case is maybe
3		10 years.
4	Q.	10 years ago?
5	Α.	10 years ago, I think-
6	Q.	And nothing since that time?
7	Α.	No .
8	Q.	I'm sorry, nothing?
9	Α.	Not as a personal referral. I am sure he has
10		been sending to our department, you know, but. he
11		has not sent his own patients to me personally,
12		private physician.
13	Q.	Doctor, could you tell me what pages, the pages
14		are numbered, that your notes are on?
15	Α.	Yes.
16		MR. GORE: And when he says what
17		pages, doctor, he is referring to these numbers
18		up here.
19	A.	Okay. I said the 14th, so I have to see that.
20		The one over here, 899, but not signed.
21	Q۰	Okay.
22	Α.	Because I did that.
23	Q.	You are saying you got an entry, but it doesn't
24		have your signature?
25	Α.	Right. This is my handwriting.

1	Q.	And that's on April 14th?
2	Α.	April 14th.
3	Q.	bet me look at that first.
4	Α.	Yes.
5	Q.	Is that the first one?
6	Α.	No, no.
7	Q.	That's
8	А.	893.
9	Q.	And that's April 12th?
10	А.	Yes.
11	Q.	And this is your signature down here at the
12		bottom?
13	Α.	Yes, that's my signature.
14	Q.	All right. What I'd like you to do, doctor, is
15		read that for me, read your note for me, and
16	n or other sea and the	this is your first note?
17		MR. GORE: Now, doctor, she is
18		going to have to take it down. So please read
19		slowly.
20	A.	S/P, meaning after operation. PTX means
21		parathyroidectomy+ Sodium calcium level fairly
22		well controlled with calcium and Vitamin D
23		supplement. Has developed hyponatremia.
24		Parentheses, 122, parentheses. Most likely not
25		enough replacement sodium chloride

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1 postoperatively.

2		Plan, check urine, sodium chloride and the
3		potassium. Switch IV to at least normal saline
4		solution. Bicarbonate down to the 10, may need
5		sodium bicarbonate IV, but wait until serum
6		calcium level well controlled. Otherwise may
7		develop pretachypnea, that mean convulsion.
8	Q.	What, in your opinion, caused the hyponatremia,
9		doctor?
10	Α.	It looked like more water went in than the
11		sodium,
12	Q.	During the operation?
13	Α.	During or even postoperatively. I did not go
14		through, you know, the detail of it.
15	Q.	The input and output you mean?
16	Α.	Well, not only input/output, but what kind of a
17		solution was replaced.
18		But another most common complication of
19		hyponatremia is related to the operation and the
20		postoperative care.
21	Q.	All right. So what did you do for that?
22	Α.	Well, that's what I said, it was the suggestion
23		over here, so I said check the urine, sodium and
24		the chloride and the potassium. That way you
25		know how much patient is losing.

23

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Okay. We are giving 10 serum, the patient 1 is losing 15 in the urine, and then we know we 2 3 have to give out at least 15 to maintain whatever the level is. 4 Ο. 5 Okay. So that's the reason why. 6 Α. All right. What is your next note, doctor? 7 0. Well, we say switch those IV solution at least 8 Α. to the normal saline, I mean whatever the normal 9 sodium concentration is. That means .9 percent 10 11 serum solution. .9? 12 Q. That equals about 150 milligram 13 Α. Yes. 14 equivalent. 15 Go ahead. a. 16 Α " And then but the bicarbonate is low, but if we give too much bicarbonate then the blood pH will 17 18 shift to what is called the alkaline side. Ιf we do that, then the serum calcium will farther 19 20 go down. Now, because of a parathyroid operation he 21 22 has already low side of serum calcium. So I say 23 it is fairly well controlled. So if we give 24 just lots of bicarbonate where somebody have a 25 low serum calcium, then more calcium will be

		25
1		anticipated. So then it's called active
2		calcium, ionized calcium we call it, will go
3		down and that the patient will prevent the
4		convulsion.
5		So even though it is low, if somebody have
6		a low serum calcium, just we cannot give them
7		lots of bicarbonate, then it will make the
8		patient sicker other than help him. That's what
9		I recommended.
10	Q.	You recommended what?
11	Α.	I say do not give too much bicarbonate.
12	Q.	I see.
13	Α.	Switch to the normal saline after this. We
14		don't want to give him too much salt because it
15		will become really an overdose. So it's a very
16		difficult situation, you know, from the start.
17	Q.	So then what happened to Mr. Carrick and what
18		did you do?
19	Α.	Then the 14th, as I said, we may not be able to
20		wait anymore, we ordered dialysis, although
21		dialysis will not cure the disease, but we have
22		to gain the time.
23		I see sodium went farther down to 119 and
24		bicarbonate remained about 10.6, about same, and
25		he had or remained high BUN, 200. So ${\tt I}$ said,

		2 6
1		you know, possible serious complication from
2	A CONTRACT OF	this condition itself.
3	Q.	Which condition?
4	Α.	Whatever he is in. In other words, high BUN and
5		hyponatremia, he may go into convulsion if we
6		don't do anything, and the BUN may be causing
7		pericarditis and massive GI bleed and so forth.
8		So I said just waiting from this point to try to
9	and the second se	treat him conservatively may not be really the
10		right way to go.
11		So I went down to his room. I think at
12		that time if I remember correctly he was in the
13		surgical ward. Surgical, all the postoperative
14		patients would be primarily under the surgeon.
15		So I explained to them
16	Q.	Are you reading now from your note or are you
17		doing this by memory? Why don't you read me
18		your note, first, of April 14th?
19	Α.	Okay. Yesterday This is Page 899.
20		Yesterday's chemistries obviously wrong. The
2 1		reason for it is the 13th, everything they said,
22		the sodium was $141$ and the potassium was 3.9,
23		and so I say this must be wrong because one day
24		it go up and the next day it come down. So
25		chances are it isn't right, meaning the blood

1		chemistry report he had, it might be wrong.
2	Q.	Meaning the ones that were done on the 14th?
3	А.	Yes. So I said maybe it could be somebody
4		else's blood, and at this a.m. K-P 6, sodium
5		119, potassium 5.2, bicarbonate 10.6, BUN 200,
6		creatinine 6.2.
7	Q.	Just so I understand, you believed that the
8		laboratory levels for April 13th were incorrect
9		as they related to
10	Α.	That's my guess.
11	Q.	Because they just didn't make sense with respect
12		to his clinical picture?
13	Α.	Didn't make sense and he was basically getting
14		sicker. Despite .9 percent saline infusion lie
15		still had hyponatremia, Because of
16		hyponatremia, metabolic acidosis, BUN, serum
17		calcium is low. So I said urgent dialysis is
18		needed to correct the above abnormality.
19		Situation explained to the patient and wife, but
20		I forgot to sign my signature.
21	Q.	Okay. Is that when <b>you</b> have a recollection of
22		talking to the family?
23	Α.	That's exactly right. See, I usually will go in
24		and explain because they say he is fine, but
25		they have an objection, ${f I}$ explained the

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1		situation, if we wait from this point there
2		really is nothing gained.
3	Q.	So you called Dr. Heyka and they agreed?
4	Α.	Well, family requested. The family said you're
5		not my doctor. My doctor is Dr. Heyka and Dr.
6		Broughan. So I said yes, okay, you know, I
7		understand what they say, because a brand new
8		doctor comes in and say I want to take over and
9		do drastic things, I say sure.
10		So I called Dr. Heyka and then I told Dr.
11		Heyka what the situation is. Then he get on the
12		telephone to the family and then they discuss
13		and then I left the room,
14	Q.	Did you ever tell the family that you had never
15		seen a case like this before?
16	Α.	Maybe I said it.
17	Q .	Well, what did you mean when you said that?
18	Α.	Well, that means, you know, just despite of
19		giving a solution it just never corrected, it is
20		getting worse, and the pictures are getting
21		worse.
22	Q.	Well, did you tell the family that had his
23		condition been treated appropriately and
24		diagnosed earlier by doctor by the earlier
25		physician that it could have been corrected?

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1	Α.	I don't lcnow. I cannot remember.
2	Q.	You're not saying you didn't say that, you just
3		can't remember it?
4	Α.	I cannot remember, yes. I usually do not make
5		that
6	Q.	When did you find out that Dr. Riley was the
7		previous physician, at what point?
8	Α.	Gee, I <b></b>
9	Q.	Was it after the lawsuit had been filed?
10	Α.	No, no, One of the, special fellow told me
11		that Dr. Nakamoto, we have a patient outside, ${ t I}$
12		said outside from who, and he said an outside
13		doctor referred the patient to Dr. Heylca, and so
14		probably I said who is the outside doctor, and
15		the special fellow might have said maybe Dr.
16		Riley, and I said oh.
17	Q.	Would that have been before or after you spoke
18		to the family or do you know?
19		MR. FIFNER: Objection.
20	Α.	That must
21	Q.	I don't want you guessing if you don't know.
22	Α.	I don't know. It must be from the 12th to the
23		14th. I saw him on the 14th. Rut I cannot
24		remember.
25	Q.	All right. What's the next thing that was done

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1		and what was your involvement from that point
2		on?
3	Α.	Well, then we gave a dialysis that evening. I
4		may be able to tell over here.
5		Yes. My guess was right then. We start
6		the dialysis 7:25 p.m. on April 14th.
7	Q.	Okay
8	A.	So as I said, we usually start in the morning or
9		early afternoon, but because of the family
10		and then the 15th we gave him another dialysis,
11		and then that afternoon, where was that? I
12		thought I had a 15th. The 14th.
13		Oh, yes. Okay. Yes, on the 15th
14	Q.	What page are you referring to now, doctor?
15	Α.	903. So we gave the dialysis on the 15th. I
16		think we did it in yes, in the morning,
17		starting at 11:30. But despite the dialysis the
1 %		patient's condition getting worse. So I saw the
19		patient and I made a note over here April 15th,
20		a nine gap is increasing.
21	Q.	A nine gap?
2 2	Α.	Delta gap. That means the metabolic acidosis.
23		There is two reasons more. One is bicarbonate
24		itself is really not changing.
25	Q.	Okay.

		31
1	Α.	And the other one is the bicarbonates are
2		changing, but you have a, you know, other acid
3		is really increasing.
4	Q.	Okay.
5	A.	So that mean, you know, four or five in a
6		different condition can cause that. So it's a
7		very, very serious condition when you see that
8		usually.
9	Q.	Which one did he have, where it was or wasn't
10		changing?
11	Α.	So I said a gap nine is increasing. Metabolic
12		acidosis. Two possibilities, sepsis and/or
13		lactic acidosis secondary to ischemic bowel, B $f 0$
14		W E L. RLB, distended bowel but no fluid
15		level. Chest x-ray, right-sided infiltrate.
16		So then I thought for more the infection.
17	Q.	Because he had pneumonia?
18	Α.	${\tt I}$ suppose that was the picture. So ${\tt I}$ said
19		antibiotics, Clindamycin and Achromycin after
20		obtaining a culture, blood in the sputum.
21	Q.	So you got, you started antibiotics and you got
22		an infectious disease consult?
23	Α.	That's right. And at the same time I think that
24		early morning after midnight on April 15th he
25		began to have, you know, respiratory problems.

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So he was transferred to the surgical intensive 1 care unit for the respiratory support and the 2 rest of the condition and the infectious people 3 took over,. and I think that night they said 4 probably vancomycin, the third medicine, that 5 was the recommendation. 6 7 All right. Did you see him any further after Q. that? 8 Yes, I think I saw him one more over here, I 9 Α. thought. Already he is in the intensive care 10 unit. So maybe I wrote a note. 11 Okay., On April 16th, try to keep us --12 What page, doctor? 13 Q. 14 I say try to keep the serum calcium about Α. 922. 6 milligram percent, calcium glauconite IV. 15 Still remains severe metabolic acidosis. Last 16 17 bicarbonate order three plus 10. This a.m. the K-P 6 are pending. Chest x-ray, right lower 18 19 infiltrate. Sputum, we have already sputum 20 result which we got on previous day. Gram 21 stain, gram positive coccus. Culture pending, Because of ileus most of the medicine including 22 23 the calcium and the Vitamin D, maybe they will 24 be not observed. 25 0. What ileus?

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1	Α.	Ileus mean the bowel is all swollen up, it is
2		not properly functioning.
3	Q.	What was causing that, doctor?
4	Α.	That could be caused by multiple causes.
5	Q,	Well, what?
6	Α.	Such as hyponatremia or some blocking off part
7		of the intestine, kink, it is all kind of
8	Q.	What <i>is</i>
9	Α.	But later on he had a GI workup and obviously
10		that was not there, I think, if I remember
11		correctly. But that was something we have to
12		consider. 1 am more concerned about whatever
13		intake of medicine, if medicine is not working
14		right, we assume it is going into the system.
15		That's the reason I said, be careful, serum
16		calcium
17	Q.	He had been given Dialume, are you aware of
18		that, as a medication?
19	A.	No.
20	Q.	You weren't aware of that?
21	Α.	Well, during hospital? He cannot was he
22		taking it in the hospital?
23	Q.	Yes.
24	Α.	But, I mean, you know
25	Q.	But what? He shouldn't have been getting

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1		Dialume, should he?
2	Α.	Why not?
3	Q.	Well, should he have been getting Dialume?
4	Α.	Sure. We give him Dialume if it is needed.
5	Q.	What does Dialume cause, doctor?
6	Α.	Oh, you are talking about like toxicity?
7	Q.	Yes.
8	Α.	That doesn't come on in a couple days.
9	Q.	It must be a long time?
10	Α.	It must be long time. Rut the acid excretion is
11		there and that's the only medicine, it does not
12		have a magnesium, doesn't have a calcium. So if
13		that's the only medicine that will help I will
14		give it, but as ${\tt I}$ said, ${\tt I}$ will watch the patient
15		very carefully. ${f I}$ won't say that Dialume is a
16		toxin.
17	Q.	Well, could that have caused the locks in his
18		colon that you believe
19	Α.	You mean ileus?
20	Q.	Yes.
21	Α.	I don't think so.
22	Q.	Well, what was causing what you called to be an
23		ileus?
24	Α.	Well, as I explained to you, other causes.
25	Q.	But they were ruled out?

1	Α.	Right. Sometimes we really don't know.
2	Q.	I see. What caused, in your opinion, his
3		postoperative pneumonia?
4	Α.	What caused?
5	Q.	Yes.
6	Α.	Well, I think because of uremic compromise.
7	Q.	Because of uremic
8	Α.	Compromise and very poor general condition.
9		Just like if somebody had kidney patients all
10		have a tendency to get all kinds of infections.
11		Not only that, it is very difficult to treat.
12	Q.	So it was his weakened neurological state that
13		you believe caused his pneumonia, the fact that
14		he was uremic, for example?
15	Α.	Well, lots of uremic patients don't get
16		pneumonia. Uremia probably contributed, but ${\tt I}$
17		cannot <b>say</b> one hundred percent, because we have
18		so many patients who are uremic and don't get
19		pneumonia,
20	Q.	So he was so bad
21	Α.	I think so.
22	Q.	And usually when you get patients I guess to
23		treat they are not in as a depressed condition
24		as he was?
25	Α.	That's right, yes. Uremia is a part of it, but

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I cannot say uremia one hundred percent. 1 He was 2 a sick man. It was unfortunate complication, one after the other, and all of them very 3 serious complications, and all the experts are 4 in there but they could not --5 Dr. Bolton or Broughan, I'm sorry, 6 Q. Yes. testified that his bone disease should have been 7 8 recognized by the treating physician much 9 earlier than it was. Do you disagree with that? 10 MR. FIFNER: Objection, Objection 11 to the form. Well, if at all possible, you know, all uremic 12 Α. patients should be treated, but in that case 13 14 nobody really gets sick. So I am really not. 15 sure. 16 I'm sorry? Ο. 17 Α. All possible complications should be treated 18 early enough --I'm asking you if you disagree with Dr. 19 Q. Broughan's statement that his bone disease, Mr. 2.0 Carrick's bone disease should have been 21 22 recognized by the treating physician much earlier than it was, Do you agree with that, 23 24 doctor? MR. FIFNER: Same objection.
		37
1	Q.	Yes or no, sir, or don't you have any opinion?
2	Α.	I will say yes, depending again on the
3		condition.
4	Q.	So you don't have an opinion on that one way or
5		the other?
6	Α.	I have to see the patient myself, and if ${\tt I}$ see
7		that somebody is breaking bone here and here but
8		everything else okay
9	Q.	Well, we know everything wasn't okay with Mr.
10		Carrick.
11	A.	Yes. Otherwise, he wouldn't have died.
12	Q.	All right. The problems that Mr. Carrick were
13		having were related to his increasing lack of
14		kidney function, were they not, to renal
15		failure?
16	Α.	What problem are you talking about?
17	Q.	Well, you name one that brought him to the
18		hospital. The problems, the muscle problems,
19		the bone problems, they were all related, were
20		they not, to increasing kidney failure?
21	Α.	Yes, that is true.
22	Q.	All right.
23	Α.	But I thought you maybe are weeding out one
24		special problem and
25	Q.	Well, I am not sure I can. Is there some

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1		problem that he had that you believe that <code>wasn't</code>
2		ultimately related to his kidney problem?
3	Α.	No.
4	Q.	They were all related to his kidney problems,
5		weren't they?
6	Α.	Oh, yes. But, you see, not everybody is like
7		that.
8	Q.	Oh, I agree with you there.
9	Α.	That is something we have to go after.
10	Q.	If you treat them right they don't die, do they?
11		MR. GORE: Objection.
12		MR. FIFNER: Objection.
13	Q.	If they get treated appropriately right from the
14		start the chances are that they won't die?
15		MR. FIFNER: Objection.
16		MR. GORE: Objection.
17	Α "	I won't say that either, because many patients
18		we treat appropriately but still die.
19	Q.	Well, the vast majority of patients treated
20		appropriately right front the start don't die, do
21		they?
22		MR. FIFNER: Objection.
23	Α.	Yes. I mean, if everything, if the treatment
24		they have they don't die, but still
25	Q.	Yes. And a man the age of Mr. Carriclc

1		ultimately would have been a very good
2		candidate, would he not, for kidney transplant?
3	Α.	If he ever become stable condition, yes, he
4		would be a candidate. But when he came to I
5		mean when I saw him on April 12th I had no way
6		we could do the transplantation.
7	Q.	I agree,
8	Α.	I don't think nobody even mentioned that to the
9		patient, I don't think so.
10	Q.	You said earlier that if you give Indocin that
11		you have to monitor the
12	Α.	Kidney function, yes.
13	Q.	And that would be what, serum creatinine, blood
14		pressure, protein and urine?
15	Α.	Yes.
16	Q.	And if those rise, would you stop the
17		medication?
18	Α.	Yes. Soon after we start the medicine, yes.
19		But in so many years then I think probably maybe
20		something else is going on. But, you know
2 1	Q.	Well, if you give somebody poison for 10 years,
22		I mean do you expect that that is going to have
23		any effect on that?
24		MR. FIFNER: Objection to the
25		form.

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1	Α.	Yes. But how many patients have a problem with
2	nen versionen er ve	Indocin, how many percent?
3	Q.	I'm not sure.
4	Α.	Not one hundred percent,
5	Q.	I see. So that it is okay then
6	Α.	Not okay. I didn't say okay. But we have to
7		follow carefully. It is doctor's judgment.
8	and the second se	Otherwise Indocin would be thrown out, I mean,
9		thrown from the the FDA say don't give. But
10	Nutrition	if I remember correctly
11	Q .	Wait a minute. Let's go slow, Are you talking
12		about Indocin to patients having kidney disease
13		or patients in general?
14	Α.	No. Kidney disease. If I remember correctly,
15		FDA said if somebody have a kidney failure
16		suspected, must be taken carefully under the
17		guidance of a doctor. I did not really see that
18		thing, but if I remember correctly that is what
19		it says.
20	Q.	You lost me. Your point is what?
21	Α.	My point is that despite of a kidney failure,
22		I'm sure a good number of patients are probably
23		getting Indocin, okay?
24	Q.	Do you know what kind of doses they are getting
25		and for how long?

1	Α.	I have no idea. But the FDA says that if you
2		have a kidney problem, just make sure special
3		doctor I mean a doctor will follow you
4		carefully, that the medicine is working on him
5		okay. So if absolutely one hundred percent
6		kidney patients all going through the trouble,
7		then, you see, doctor cannot use Indocin for the
8		renal failure.
9	Q.	Well, that's not what you use Indocin for.
10	A.	As far as I know there is no such statement came
11		out of the FDA.
12	Q.	No. You don't use Indocin for renal failure, do
13		you?
14	Α.	As I said, if somebody have a renal failure,
15		then you use the Indocin carefully if
16		indicated. Don't give it right at go.
17	Q.	What do you use it for?
18	Α.	Well, if somebody have gouty pain or joint pain
19		and so forth.
20	Q.	What is allopurinol?
21	Α.	Well, $\mathbf{I}$ am not sure I have to answer that
22		question.
23	Q.	Well, sir, you can't just answer the ones you
24		want to answer. Sometimes you got to answer the
25		ones I want you to answer.

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1		MR. GORE: If you know what
2		allopurinol is, go ahead and answer the
3		question.
4	А.	Well, Dr. Heyka say already.
5	Q.	Did you read his deposition?
6	А.	Yes, I read it.
7	Q.	I see. What other depositions have you read?
8	A.	That's the only one I read.
9	Q.	Did you read Dr. Riley's deposition?
10	Α.	No, not at all Only Dr. Heyka.
11	Q.	And allopurinol is the treatment of choice, is
12		it not, for gout?
13	Α.	But may not take the pain out. Then you still
14		have to give something to take the pain out.
15		See?
16	Q.	I see.
17	Α.	Gout and uric acid may not be one hundred
18		percent under control. So you have gout, too.
19	Q.	When did you read Dr. Heyka's deposition?
20	Α.	Oh, that was, when was that?
21		MR. GORE: I can't testify.
22	Α.	Oh, you can't.
23		MR. GORE: As best you recall,
24	Α.	I think about 10 days ago.
25	Q.	Would you agree with Dr. Heyka's testimony that

		4 3
1		he would not give Indocin for an extended number
2		of years in a patient with renal failure, do you
3		agree with that?
4	Α.	In general, yes.
5		MR. FIFNER: Objection.
6	Q.	Do you agree
7	Α.	In general, not one hundred percent.
8	Q.	Sure. If you see a rise in serum creatinine,
9		blood pressure, protein, would you stop the
10		Indocin, would you agree with that?
11		MR. FIFNER: Objection.
12	Q.	Would you agree with that, sir?
13	Α.	If I know what his primary kidney disease is.
14		If somebody have a problem or whatever the
15		disease is, Indocin may not be appropriate, then
16		high blood pressure may be due to the nephritis,
17		and the protein is probably high due to the
18		n e p h r i t i s .
19	Q.	Excuse me, doctor, because I don't want you to
20		confuse me. But what was the high blood
21		pressure in Mr. Carricle due to probably? It was
22		probably due to his renal failure, wasn't it,
23		sir?
24	Α.	That's right.
25	Q.	So let's talk about, you lenow, what we know

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about here as opposed to, you know, things that 1 we don't know about. 2 But we don't know what the exact cause of the 3 Α. renal failure was. That's the problem. 4 Well, gee, in your opinion, should somebody have 5 Ο. done some tests then to determine what the 6 7 primary cause of his renal failure was? 8 MR. FIFNER: Objection. 9 .A • Well, we don't know. My question is should somebody have done some 10 Ο. tests to try to determine what the cause was? 11 12 MR. FIFNER: Objection. 13 Α. Yes. And that wasn't done, was it? 14 Q. MR. FIFNER: 15 Objection. 16 I don't know. I did not review the chart. Α, Did you receive any other information other than 17 Q. 18 just reviewing Dr. Heyka's deposition? 19 That's it. Α. 20 Well, I mean, did you read any deposition Ο. 21 summaries of any kind? 2.2 Not at all. Only Dr. Heyka's and part of a Α. 23 chart which I was involved. 24 Ο. You read Page 922. Any others? 25 And I'm sorry. I may have interrupted you

1		in reading your note. If I did, why don't you
2		finish it.
3		MR. GORE: Did you finish this
4		note?
5	Α.	Okay. I say, I say in the meantime, in other
6		words, we are talking about still serum calcium,
7		okay? So then I said, you know, what we think
8		just giving calcium supplement and the Vitamin D
9		through the mouth is maybe not working. So I
10		said as long as he has an intestinal problem,
11		just to give the intravenous calcium supplement
12		so we know the exact thing is going into the
13		system, that's what I said.
14	Q.	Okay. Anything else?
15	Α.	No, that's <b>it</b> .
16	Q .	Any further notes, doctor?
17	Α.	Let's see.
18		Well, it is already the 17th. So I
19		suppose, you know, he went to the surgical.
20		intensive care unit, So what I wcote is
21		possibly dialysis. Let's see.
22	Q.	Let's go slow. I mean you have been reading
23		your progress notes, correct?
24	Α.	Yes.
25	Q .	Are there any additional progress notes?

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I doubt very much because they transferred --1 Α. I understand. They transferred him to the 2 Q. SSCU. My question is did you write any? 3 Well, I did not really review the chart after 4 Α. that. But that is the whole responsibility of 5 somebody else. 6 7 MR. GORE: Why don't you take a quick look and see if you wrote any other 8 9 progress notes. 10 Α. Yes. No, I cannot -- I cannot -- as far as I can tell --11 12 Now, you were a minute ago going to refer to Q. dialysis notes you think that you may have 13 written? 14 Well, dialysis notes --15 Α. 16 Yes, I had April 27th, that is Page 823. 17 Q. Okay. Why don't you just help me through one of these so that I can interpret it and see what 18 19 I'm looking at. 20 Α. See, this is individual dialysis --21 Q. Okay. 22 Α. -- sheet will be kept on the dialysis unit. 23 Q . Okay, 24 And then April 27th I was the doctor probably Α. 25 responsible for the dialysis.

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1	Q.	Why don't you read it for me, if you would?						
2	Α.	This sheet will tell the patient's weight before						
3		and after dialysis, vital signs, blood pressure,						
4		temperature.						
5	Q.	Well, where does it tell his weight before and						
6		after?						
7		MR. GORE: Before and after the						
8		vital signs.						
9	А.	This time he was too sick.						
10	Q.	To weigh him?						
11	Α.	Yes. So we scratch out.						
12	Q.	In other words, there is a box there to						
13		determine what his weight is before and after?						
14	Α.	That's right.						
15	Q.	On this particular day there is nothing in there						
16		because you couldn't do it is what you are						
17		saying?						
18	Α.	We thought that it was best not to do because he						
19		was already breaking bone at that time.						
20	Q.	How would he get back and forth to dialysis, by						
2 1		cart <b>or</b> bedside?						
22	A.	No. He had only two dialysis on our inpatient						
23		dialysis unit. But any patient who is acute in						
2 4		the intensive care unit is medical/surgical						
25		care, and we always do the dialysis at the						

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1		bedside in that case.							
2	Q.	I'm sorry. <i>Go</i> ahead.							
3	Α.	And then the type of kidney, how many hours we							
4		had to dialyze, weight loss, and then how we							
5		heparinized, what kind of dialysis solution we							
6		used.							
7	Q.	And then it has got lab work, what does that							
8		say?							
9	Α.	And the lab work, same 10 cc of blood. Pre and							
10		the post dialysis for further study. That means							
11		was it working properly.							
12	Q.	Under medications, what does that say?							
13	Α.	Well, he was going into convulsion,							
14	Q.	I am sorry?							
15	Α.	Seizure,							
16	Q.	Impression?							
17	Α.	Impression.							
18	Q.	JM?							
19	Α.	No. This is the name of antibiotic, a							
20		penicillin.							
21	Q.	Toxicity convulsion?							
22	Α.	Yes. And so I said no other way and then, you							
23		know, I stained it.							
24		In other words, this time it was to remove							
25		the penicillin maybe too excessive because of							
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1		renal failure. That is suspected, question
2		mark.
3	Q.	So the purpose of that particular dialysis was
4		to try to remove excessive penicillin?
5	Α.	Yes. Because he began to have focal seizures.
6	Q.	All right. Any others that you wrote, doctor?
7	Α.	No.
8	Q.	Okay. Did you have any further discussions or
9		contacts with the patient or his family that you
10		can recall?
11	Α.	I don't. Well, I saw the patient's family at
12		the intensive care unit, but, you know, I was
13		not really the primary service. So I don't
14		think the very serious conversation was on
15		the April 14th, patient and the family strongly
16		opposed the dialysis. I said, you know, if we
17		don't do that probably this will happen, and it
18		probably would be best to do, but the family
19		said you are not our doctor.
20	Q.	We got that conversation. Any others?
21	Α.	No.
22		MR. KAMPINSKI: All right. That's
23		all I have.
24		MR. GORE: Gentlemen?
25		MR. FIFNER: No. I don't have

							5 (
1	anything.						
2		MR.	GORE:	Thank	s, doct	or.	
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4							
5			S	A'I'ORU N	ΑΚΑΜΟΤΟ	, M.D.	
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FORM CSR L REPORTERS # D E CO. 800-626-6313

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4	<u>CERTIFICATE</u>
5	The State of Ohio, ) SS:
6	County of Cuyahoga.)
7	
8	I, Susan M. Cebron, a Notary Public within and for the State of Ohio, authorized to
9	administer oaths and to take and certify depositions, do hereby certify that the
10	above-named <u>SATORU NAKAMOTO, M.D.</u> , was by me, before the giving of their deposition, first
11	duly sworn to testify the truth, the whole truth, and nothing but the truth; that the deposition as above-set forth was reduced to
12	writing by me by means of stenotypy, and was later transcribed into typewriting under my
13	direction; that this is a true record of the testimony given by the witness, and was
14	subscribed by said witness in my presence; that said deposition was taken at the aforementioned
15	time, date and place, pursuant to notice or stipulations of counsel; that I am not a
16	relative or employee or attorney of any of the parties, or a relative or employee of such
17	attorney or financially interested in this action.
18	IN WITNESS WHEREOF, I have hereunto set my
19	hand and seal of office, at Cleveland, Ohio,
20	this day of, A.D. 19
21	Susan M. Cebron, Notary Public, State of Ohio
22	1750 Midland Building, Cleveland, Ohio 44115 My commission expires August 16, 1993
23	My Commission Explies August 10, 1995
24	
25	

## LAWYER'S NOTES

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# **ARTER & HADDEN**

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November 26, 1990

25902/05990

Charles Kampinski, Esq. **1530** Standard Building 1370 Ontario Street Cleveland, Ohio 44113

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Deirdre G. Henry, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113-2241

#### RE: Carrick v. Cleveland Clinic

Counsel:

Enclosed are copies of the notations of Dr. Nokomoto which were referenced in the doctor's deposition for the above-captioned matter. The notations of Dr. Nokomoto include copies of the index cards which the doctor referred to during the deposition with regard to the care and treatment of Michael Carrick. Also included are copies of the original Cleveland Clinic medical record which contain Dr. Nokomoto's clinical sheet notations as well as the hemodialysis unit data for the date of The pages from the original Cleveland Clinic medical record 4/27/89. are numbered 823 and 824, 893, 899, 903, and 922. Thank you for your attention to this matter.

Sincerely

Gwenn Holler, R.N., M.S.N. Legal Assistant

GCH/LL1/1082.2 Enc. ccw/o enc:

Doug Fifner, Esq. (Reminger) George Gore, Esq. (A&H)

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## <u>C U R R I C U L U M V I T A E</u>

Satoru Nakamoto, M.D. Born: November 1, 1927 in Iwakuni, Yamaguchi, Japan U.S. Citizen, 1963 Social Security 8074 30 2742

- Married to Grace C. Maruo Born: 9/20/31 Children - Dean Nakamoto " 2/14/61 Donna Nakamoto " 6/20/63 David Nakamoto " 6/9/68
- Degrees: 1) M.D. The Yamaguchi Medical School, Japan in March 1951. 2) M.S. The University of Colorado in June 1959.

Post Graduate Training:

	Internship at the U.S. Army Hospital, Japan.
1952–1953	Resident in Medicine at the Yamaguchi Medical School
	Hospital in Japan.
1953-1954	Rotating Internship at the Kuakini Hospital, Honolulu.
	Resident in Medicine at the Metropolitan Hospital
	New York Medical College, New York City.
1955-1956	Fellow in Cardiology at the University of Colorado
	Medical Center, Colorado.
1956-1957	Fellow in Research at the Cleveland Clinic Foundation
	Cleveland, Ohio.
1957-1958	Resident in Medicine at the University of Colorado
	Medical Center, Colorado
1958-1960	Special Fellow at the Dept. of Artificial Organs,
	Cleveland Clinic Foundation, Cleveland, Ohio,

#### Research:

Fellow in the Research Division of the Cleveland Clinic Foundation, mainly in Renal Disease and the Artificial Kidney at the Dept. of Artificial Organs headed by Dr. W.J. Kolff between 1958 and 1960. Participated organizing the Transplant Program at the Cleveland Clinic Foundation. Author and co-author of many scientific papers about Dialysis, Transplantation, etc.

- <u>Award</u>: Science Research Award-Kidney Transplantation by the Interstate. Postgraduate Medical Association of North America in November 1965.
- Books: 1) Contributor in Renal Failure published by Lippincote in 1967.
  - 2) Contributor in manual on Artificial Organs, Volume I The Artificial Kidney published by Mosby in 1969.

#### Hospital Position:

Assistant Staff member of the Cleveland Clinic Foundation, 1961-1963. Staff member of the Cleveland Clinic Foundation since 1964 to the present. Head, Dept. of Hemodialysis, Cleveland Clinic Foundation since 1967. Head, Section of Hemodialysis Dept. of Hypertension & Nephrology, 1971. Senior Staff Member, Dep't of Hypertension and Nephrology, 1984 Emeritus Staff Member, January, 1991

### Membership:

- 1) American Heart Association
- 2) American Medical Association
- 3) American Society of Artificial Internal Organs
- 4) American Society of Nephrology
- 5) European Dialysis & Transplant Association.
- 6) International Society of Nephrology
- 7) New York Academy of Science.
- 8) Ohio State Medical Association
- 9) Transplant Society.

#### Medical License:

- 1) Licensed in Virginia December 4, 1959 #14240
- 2) Licensed in Ohio June 16, 1961 824946

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3)<sup>3</sup> Licensed in Japan-October 10, 1951 #145819

#### BIBLIOGRAPHY

SATORU NAKAMOTO, M.D.

- 1. Nakamoto, S. and Kolff, W.J.: Chronic Uremia Due to Polycystic Renal Disease Treated with the Artificial Kidney, AMA Arch. Int. bled. 101:921, 1958.
- 2. Holmes, J.H., Nakamoto, S. and Sawyer, K.C., Jr: Changes in Blood Composition before and after Dialysis with the Kolff Twin Coil Kidney, Trans. Amer. Soc. Artif. Int. Organs. 4:16, 1958.
- 3. iiakamoto, S., and Holmes, J.H.: Our Experience in Regional Heparinization, Trans. Amer. Soc. Artif. Int. Organs, 4:36, 1958.
- 4. Holmes, J.H. and Nakamoto, S., Removal of Fluid from the Patient during Hemodialysis, Trans. Amer. Soc. Artif. Int. Organs. 5:58, 1959.
- 5. Kolff, W.J., Nakamoto, S., and Humphrey, D.C.: Recovery from Anuria after Suffocation in Nitrogen Treatment with the Artificial Kidney, Ohio State Pled. J., 55:1230, 1959.
- 6. Nakamoto, S., and Kolff, W.J.: The Artificial Kidney for Acute Glutethizide (Doriden) and Barbiturate Poisoning; Report of Four Cases, CCQ 27:58, 1960.
- 7. Britton, R.C. and Nakamoto, S.: Intervenous Infusion of Dialysis, Autogenous, Ascitic Fluid in the Management of Cirrhotic Ascites; A Preliminary Report of Favorable Results in Six Patients, CCQ 27:82, 1960.
- 8. Goldsmith, J.H., Nakamoto, S., and Kolff, W.J.: Expanding the Indications for Treatment with the ARtificial Kidney, The Lancet pp 111 (July 16) 1960.
- 9. Nakamoto, S. and Kolff, W.J.: Newer Advances Using Ultrafiltration and Regional Heparinization and Ultrafiltration of Ascites, Acad. of Med. New Jersey Bull. 6:5, 1960.
- 10. Eyschen, J.M., Nakamoto, S., and Kolff, W.J.: Neuromuscular Syndrome-After Electrolyte Disturbance and Severe Acidosis-Treatment with the Artificial Kidney, Minnesota Med. Oct, 1960, pp 693.
- 11. Nakamoto, S.: Removal of Edema Fluid by Ultrafiltration with the Disposable Twin-Coil Artificial Kidney; Report of Two Cases, CCQ 28:10, 1961
- 12. Geyer, J.R., and Nakamoto, S.: Artificial Hibernation; Report of Three Cases Including Two with Dialysis, CCQ 28:20, 1961.
- 13. Ragde, H., Nakamoto, S. and Kolff, W.J., Simultaneous Hemodialyses with Twin Coil Artificial Kidney, JAMA 176:668, 1961.
- 14. Nakamoto, S., Brandon, J.M., Franklin, M., Rosenbaum, J.L., and Kolff, W.J. Experience with A-V Shunt Cannulae for Repeated Dialysis, Trans. Amer. Soc. Artif. Int. Organs 7:130, 1961.
- 15. Nakamoto, S., Britton, R.C., and Kolff, W.J., Ultrafiltration of Ascites, Trans. Amer. Soc. Artif. Int. Organs 6:15, 1960.
- 16. Hindberg, J., Nakamoto, S., and Kolff, W.J., Anuria after Operation for Abdominal Aortic Aneurysm Treated by Hemodialysis with Complete Recovery, Surgery 50:755, 1961.

- Brandon, J.M., Nakamoto, S., Rosenbaum, J.L., Franklin, M., and Kolff, W.J., Experience with Periodic, Long (± 20 Hours) Dialyses, Trans. Amer. Soc. Artif. Int. Organs 7:130, 1961.
- 18. Kolff, W.J., Nakamoto, S., and Scudder, J.P., Experience with Long-Term Intermittent Dialysis, Trans. AMer. Soc. Artif. Int. Organs 8:292, 1962.
- 19. Rosenbaum, J.L., Nakamoto, S., and Kolff, W.J.: Artificial Kidney in Chronic Renal Failure, Postgrad. bled., 32:585, 1962.
- 20. Brandon, J. M., Nakamoto, S., Rosenbaum, J.L., Franklin, M. and Kolff, W.J., Prolongation of Survival by Periodic Prolonged Hemodialysis in Patients with Chronic Renal Failure, Am J. Med. 33:538, 1962.
- 21. Sitprija, V., Nakamoto, S. and Kolff, W.J.: Hemodialysis in Obstructive Disease as a Preliminary to Urologic Diagnosis, J. of Urology 89:149, 1963.
- 22. Barber, N.D., Nakamoto, S., McCormack, L.J. and Kolff, W.J.: Pathologic Anatomy of 13 Patients after Prolonged Periodic Hemodialyses, Trans. Amer. Soc. Artif. Int. Organs 9:21, 1963.
- 23. Nakamoto, S., and Kolff, W.J.: The Uric Acid Anuria of Leukemia Treated by Dialysis, Ohio State Med. J. 59:1012, 1963.
- 24. Seto, D., Fritz, W., Nakamoto, S., and Kolff, W.J.: The Effect of Bilateral Nephrectomy and of Sodium and Water Content on Hypertension, Trans. Amer. Soc Artif. Int. Organs 9:35, 1963.
- 25. Sanchez-Sicilia, L., Seto, D.S., Nakamoto, S., and Kolff, W.J.: Acute Mercurial Intoxication Treated by Hemodialysi, Ann. Int. Med. 59: 692, 1963.
- 26. Kolff, W.J., Seto, D., and Nakamoto, S.: Bilateral Nephrectomy and Changes in Sodium and WAter Content in Hypertension, Excerpta Medica International Congress Series No. 78:374, 1963.
- 27. Versaci, A.A., Nakamoto, S., and Kolff, W.J.: Comparison of Twin Coil, Single Coil and Small Twin Coil Artificial Kidney, Trans. Amer. Soc. Artif. Int. Organs 10: 186, 1964.
- 28. Versai, A.A., Olson, K., McMain, P.B., Nakamoto, S., and Kolff, W.J.: Uremic Polyneuropathy and Motor Nerve Conduction Velocities, Trans. Amer. Soc. Artif. Int. Organs 10:328, 1964.
- 29. Hoffman, G.C., McMain, P.B., and Nakamoto, S.:Erythropoietin Production Following Renal Homotransplantation, Trans. Amer. Soc. Artif. Int. Organs 10:418, 1964.
- 30. Nakamoto, S., Figueroa, J.E., Versaci, A.A., Straffon, R.A., and Kolff, W.J.: The Use of Kidneys from Cadavers for Renal Homotransplantation in Man, Trans. Amer. Soc. Artif. Int. Organs 10:247, 1964.
- 31. Versaci, A.A., Nakamoto, S., and Kolff, W.J.: Phenelzine Intoxication: Report of a Case Treated by Hemodialysis, Ohio State bled. J. 60:770, 1964.
- 32. Figueroa, J.E., Nakamoto, S., Poutasse, E.F., and Kolff, W.J., Renal Homotransplantation in Man: Report of Six Consecutive CAses, Ann Int. Med. 61: 188, 1964.

- 33. Kolff, W.J., Nakamoto, S., Poutasse, E.F., Straffon, R.A., and Figueroa, J.E.: Effect of Bilateral Nephrectomy and Kidney Transplantation on Hypertension in Man, Supp. II to Circulation 29 and 30:23, 1964.
- 34. Nakamoto, S. and Kolff, W.J.: Hemorrhagic Diathesis in Uremia and the Avoidance of Bleeding Problems during Dialysis, Ann N.Y. Acad. Sciences 115:348, 1964.
- 35. Nakamoto, S., Poutsse, E.F., and Kolff, W.J.: The Course of Renal Hypertension after Bilateral Nephrectomy, Ann N.Y. Acad. Sciences 120:607, 1964.
- 36. Seto, D., McCullagh, E.P., Nakamoto, S. and Kolff, W.J.: Diabetic Acidosis and Acute Renal Insufficiency: Acute Tubular Necrosis Treated by Dialysis Diabetes 14:36, 1965.
- 37. Dunea, G., Nakamoto, S., STraffon, R.A., Figueroa, J.E., Versaci, A.A., Shibagaki, M., and Kolff, W.J.: Renal Homotransplantation in 24 patients. Brit. Med. J. 1:7, 1965.
- 38. Nakamoto, S., Straffon, R.A., and Kolff, W.J.: Human Renal Homotransplantation with Cadaver Kidneys, JAMA 192:302, 1965.
- 39. Dunea, G., Nakamoto, S., Straffon, R.A., and Kolff, W.J.: Kidney Transplantation, 1964, Arch. Int. Med. 116:234, 1965.
- 40. Stewart, B.H., Straffon, R.A., Hewitt, C.B., Kiser, W.S., Nakamoto, S. and Kolff, W.J.: Renal Homotransplantation with Cadaver Donors, Urology Digest 4:19, 1965.
- 41. Figueroa, J.E., Nakamoto, S., and Kolff, W.J.: Human Cadaver Kidney Transplantation: A Progress Report, Trans. Amer. Soc. Artif. Int. Organs. 11:213, 1965.
- 42. McMain, P.B., Hoffman, G.C., Nakamoto, S., and Kolff, W.J.: Erythropoeisis and Renal Homotransplantation, The Canadian Med. Assoc. J. 93:241, 1965.
- 43. Nakamoto, S., Dunea, G., Kolff, W.J., and McCormack, L.J.: Treatment of Oliguric Glomerulonephritis with Dialysis and Steroids, Ann. Int. Med. 63:359, 1965.
- 44. Straffon, R.A., Nakamoto, S., and Kolff, W.J.: Clinical Experience with Renal Transplantation, Brit. J. Urol. 37:370, 1965.
- 45. Roenigk, H.H. Jr., Haserick, J.R., Nakamoto, S., and McCormack, L.J.: Systemic Lupus Erythematosus and Renal Transplantation: Report of Two Cases, Arch. Dermt. 92:263, 1965.
- 46. Nakamoto, S., Two Years' Experience with Renal Homotransplantation, Melsunger Medical Communication 39:64, 1965.
- 47. Figueroa, J.E., Antunex, A., Nakamoto, S., and Kolff, W.J.: The Scintigram after Renal Transplantation in Man, New Eng J. Med: 273:1406, 1965.
- 48. Kolff, W.J., Hewitt, C.B., Kiser, W.S., Nakamoto, S., Stewart, B.H., and Straffon, R.A.: The Treatment of Irreversible Renal Failure in Cleveland Present Status and Proposals for the Future, The Bulletin, 51:3, 1966.

- 49. Tchetchik, M., Nakamoto, S., and Kolff, W.J.: Reuse of Twin-Coil Disposable Artificial Kidneys with Their Priming Blood, JAMA, 196:5, 1966.
- 50. Beaudry, C., Nakamoto, S., and Kolff, W.J.: Uremic Pericarditits and Cardiac Tamponade in Chronic Renal Failure, Ann. Int. Med. 64:5, 1966.
- 51. Straffon, R.A., Hewitt, C., Kolff, W.J., Stewart, B., Nakamoto, S., and Kolff, W.J.: Clinical Experience with the Use of 79 Kidneys from Cadavers for Transplantation, Surg, Gyn & Ob 123:483, 1966.
- 52. Nakamoto, S., Wilbrant, R., and Kolff, W.J.: Renal Allogenic Transplantation in Human Utilizing Cadaver Kidneys, Symposion in Innsbruck am 26 und 27, 1965.
- 53. Kolff, W.J., and Nakamoto, S.: Progress in Dialysis, III Int. Congress of Nephrology Abstracts.
- 54. Dunea, G., Nakamoto, S., and Kolff, W.J.: Current Status of Cadaver Kidney Transplantation, Urology Digest, Oct. 1966.
- 55. Alfidi, R.J., Meaney, T.F., Buonocore, E., and Nakamoto, S.; Evaluation of Renal Homotransplantion by Selective Angiography, Radiology, 87:6, 1099, 1966.
- 56. Khastagir, B., Shibagaki, M., Wilbrandt, R., Montandon, A., Nakamoto, S., Kolff, W.J.: Further Experience with Cadaver Kidney Transplantation. Trans. Amer. Soc. Artif. Int. Organs, 12:239, 1966.
- 57. Lewis, L., Zuehlke, V., Nakamoto, S., Kolff, W.J., and Page, I.H.: Renal Regulation of Serum Lipoproteins, New Eng. J. of Med. 275:1097, 1966.
- 58. Tchetchik, M., Nakamoto, S., Straffon, R.A., and Kolff, W.J.: Transplantation of Kidneys From Human Cadavers, Israel J of Med Science, 1:957, 1965.
- 59. Nakamoto, S., Straffon, R.A., and Kolff, W.J.: Three Year's Experience with Cadaver Kindey Transplantation, III International Congress of Nephrology - Abstract, 1966,
- 60. Gifford, R., Deodhar, S., Stewart, B., Nakamoto, S., Shibagai, M., and Kolff, W.J.: Retransplantation After Failure of First Renal Homografts JAMA 199:799, 1967.
- 61. Kolff, W.J., and Nakamoto, S.: Progress in Dialysis, Proc. 3rd Int. Congress Nephrol. 3:274, 1966.
- 62. Kolff, W.J., and Nakamoto, S.: Cadaver Kidney Transplantation Versus Dialysis, Excerpta Medica International Congress Series No. 137, 1966.
- 63. Nakamoto, S., Dunea, G., Muehrcke, R., and Schwartz, F.: Thromobotic Thromobocytopenic Purpura with Acute Anuric Renal Failure, American J of Med. 41, 1966.

- 77. Smith, E., Gifford, R., Nakamoto, S., Straffon, R., Tung, K., Deodhar, S., Vidt, D., and Humphrey, D.: Relationship Between Original Renal Disease and Fate of Renal Allografts. Postgraduate Medicine, 45, 1969.
- 73. Wilbrandt, R., Tung, K., Deodhar, S., Nakamoto, S., and Kolff, W.J.: ABO Blood Group Incompatibility in Human Renal Homotransplantation. The American J of Clin. Path. 51, 1, 1969.
- 79. Kuruvila, K.C., Magnusson, M., Popowniak, K.L. and Nakamoto, S.: Comparative Clinical Study of the Washing Machine, Twin-Coil, and Kiil Dialyzers for Home Dialysis, Trans. American Society of Artificial Internal Organs 15, 1969.
- 80. Nose, Y., Mrava, G.L., Weber, D., Kon, T., Nakamoto, S., Popowniak, K.L. and Kuruvila, K.C.: Clinical and Engineering Evaluation of Disposable Envelope Inserts for the Kiil Dialyzer. Trans. American Society of Artif. Int. Organs, 15, 1969.
- 81. Olsson, C.A., Bauditz, W., Kiser, W., Nose, Y., and Nakamoto, S.: Successful 24-hour Canine Kidney Preservation. Journal of Urology 102:386, 1969.
- 82. Egleston, T., Acchiado, S., Antunex, A., and Nakamoto, S.: I Hippuran in the Evaluation of Transplanted Kidneys. Radiology 93:1145, 1969.
- 83. Ackman, C., Atkinson, J., Barnes, B.A., Dossetor, J.B., Hume, D.M., Martin, D.C., Murray, J., Najarian, J.S., Reemtsma, K., Starzl, T., and Nakamoto, S.: Seventh Report of the Human Kidney Transplant Registry. Transplantation 8:721, 1969.
- 84. Ackman, C.F., Atkinson, J.C., Barnes, B.A., Dossetor, J.B., Hume, D.M., Martin, D., Murray, J.E., Najarian, J.S., Reemtsma, K., Starzl, T.E., and Nakamoto, S.: Transplanation, 8:729, 1969.
- 85. Magnusson, M., Johnson, W., Deodhar, S., Kiser, W.S., and Nakamoto, S.: Long Term Function of Canine Autograft Kidneys that had been Preserved Extracorporeally for Twenty four Hours. CCQ 37:139, 1970.
- Magnusson, M.O., Kuruvila, K.C., Jarvis, P.E., Popowniak, K.L., and Nakamoto, S.: Clinical Experience in HOme Dialysis with Three Different Artificial Kidneys- The Washing Machine, Twin-Coil and Kiil Dialyzer; Proc. of European Dialysis and Transplantation, 6:116, 1969.
- 87. Cascardo, S., Acchiardo, S., Beven, E.G., Popowniak, K.L., and Nakamoto, S. Proximal Arteriovenous Fistula for Hemodialysis when Radial Arteries are Unavailable. Proc. of European Dialysis Transplantation Assoc. 7:42, 1970.
- 88. Deodhar, S.D., Konomi, K., Nakamoto, S., and Kuruvila, K.C.: Clinical Experience with Antilymphocyte Globulin (ALG) in Renal Transplantation. Transplantation Proc. 3:758, 1971.

- 64. Zuhlke, V., Deodhar, S., Nakamoto, S., and Kolff, W.J.: Serum Immunoglobulin Levels Following Human Renal Allotransplantation: A Preliminary Report. Transplantation, 5, 2, 1967.
- 65. Kiser, W., Straffon, R., Hewitt, C., Stewart, B., Nakamoto, S. and Kolff, W.J.: Clinical Experience with One Hundred Twenty-one Human Kindey Transplants. The American Surgeon, 33, 4, 1967.
- 66. Nakamoto, S., Straffon, R. and Kolff, W.J: Three Years Clinical Experience with Cadaver Kindey Transplantation. Transplantation, 5,4, Part 2 of 2 parts, 1967.
- 67. Shimizu, A., Nakamoto, S., and Kolff, W.J.: Guide for Treating Patients by Chronic Dialyses with the Twin-coil Artificial Kidney, CCQ 34, 1967.
- 68. Nakamoto, S., Straffon, R., and Kolff, W.J.: Three Years' Clinical Experience with Kidney Transplantation. Renal Failure by Albert Brest, and John H. Moyer, M.D., 233-242, 7967.
- 69. Straffon, R., Kiser, W.S., Stewart, B., Hewitt, C., Gifford, R., and Nakamoto, S.: Four Years' Clinical Experience with 138 Kidney Transplants. Transactions of the American Association of Genito-Urinary Surgeons, 59, 1967.
- 70. Nakamoto, S., Erben, J., and Kolff, W.J.: "Make-it-Yourself" Artificial Kidney for at Home Dialysis; Excerpta Medica International Congress Series, Proceedings of the Fourth Conference of the European Dialysis and Transplant Assoc. No. 155, 392, 1967.
- 71. Kon, T., Williams, C., Venaleck, J., Nakamoto, S., Weber, Wildevuur, C., and Nose, Y.: Experimental Effect of Negative Pressure on Ultrafiltration in Hemodialysis. CCQ, 35:115, 1968.
- 72. Bauditz, W., Olsson, C., Kiser, W.S., Nose, Y., and Nakamoto, S: Twentyfour Hour Preservation of Canine Kidneys with Pulsatile Perfusion. Trans. Amer. Soc. Artif. Int. Organs, 14:134, 1968.
- 73. Konomi, K., Deodhar, S., ,Tung, K., and Nakamoto, S.: Immunosuppression with Antilymphocyte Globulin in Clinical Renal Transplantation. Surg. Forum, 1968.
- 74. Deodhar, S., Tung, K., and Nakamoto, S.: Renal Homotransplantation in a Patient with Primary Familial Oxalosis. Arch. Path. 87, 1969.
- 75. Popowniak, K.L., and Nakamoto, S.: Five Years of Clinical Experience with Cadaver Kidney Transplantation. J. of Amer. Women's Assoc. 23, 1968.
- 76. Khastagir, B., Montandon, A., Nakamoto, S., and Kolff, W.J.: Early and Late Failures of Human Cadaveric Renal Allografts. Arch Inter Ned. 123, 1969.

- 89. Popowniak, K.L., and Nakamoto, S.: Immunosuppresive Therapy in Renal Transplantation. Surg. Clinics of North America, 51, 5, 1971.
- 90. Nose, Y., Malchesky, P., Nakamoto, S., Popowniak, K.L., Myers, C.H., Wesely, S.A., Schmitt, G.W., Shalhoub, R.J., and Austin, C.: Clinical Evaluation of Disposable Kiil Envelope Insert. Proceedings Dialysis Transplant Forum. pg. 108, 1971.
- 91. Nakamoto, S.: Artificial Kidney: Past, Present, and Future. Proceedings of Japanese Artificial Dialysis Association, 4:2:181, 1971.
- 92. Nakamoto, S: Chronic Dialysis and Kidney Transplantation: Intensivmedizin. Band 9, Heft 1, Seite 39, 1972.
- 93. Braun, W.E., Magnusson, M.O., Nakamoto, S., Popowniak, K.L., and Kiser W.S.: Intraoperative Blood Transfusions and Hyperacute Renal Allograft Rejection in a Presensitized Recipient. Transfusion, 12:5:348, 1972.
- 94. Braun, W.E., Staffon, R.A., Nakarnoto, S., Popowniak, K.L., Gifford, R.W., Kuruvila, C., and Zachary, A.A.: Mismatched HL-A Haplotypes with Antigents HL-A1, 3, and 11 Associated with Excellent Renal Allograft Function: Transplantation, 15: 1:86, 1973.
- 95. Popowniak, K.L., Esselstyn, C.B., Jr., and Nakamoto, S.: Parathyroidectomy for the Treatment of Renal Osteodystrophy and Tertiary Hyperparathyroidism: A Progress Report. Surgical Clinics of North America, 54:325, 1974.
- 96. Banowsky, L.A., Braun, W.E., Mangusson, M.O., and Nakamoto, S.: Current Status in Adult Renal Transplantation at the Cleveland Clinic. The Journal of Urology, 111:573, 1974.
- 97. Braun, W.E., Banowsky, L.H., Straffon, R.A., Nakamoto, S., Kiser, W.S., Popowniak, K.L., Hewitt, C.B., Stewart, B.H., Zelch, J.V., Magalhaes, R.L., Lachance, J.G., and Manning, R.F.: Lymphoceles Associated with Renal Transplantation: American Journal of Medicine, 57:714, 1974.
- 98. Nakamoto, S: Current Clinical Status of Human Renal Transplantation. The Journal of Japan Medical Association 73:904, 1975.
- 99. Malchesky, P.S., Surovey, B.S., Kiraly, R., Carse, C., Nakarnoto, S., Hulsman, A, Vidt, D., and Nose, Y.: The Coiled Envelope: Medical Instrumentation, 9:129, 1975.
- 100. Braun, W.E., Crile, G. Jr., Graffon, R.A., Nakamoto, S., Isbister, W.H., Gifford, R., Deodhar, S., Khanna, R., and Banowsky, L.H.: Thymectomy and Splenectomy in Long-Term (6-11 years) Renal Allograft Recipients. Transplantation Proceedings, 7:1:1, 1975
- 101. Wada, M., Minamisono, T., Fujii, H., Morita, T., Akamatsu, A., Mise, J., Nakamoto, S., and Naito, K.H.: Studies on the Effect of Hemodialysis in Plasma Lipoprotein, Trans. Amer. Soc. Artif. Int. Organs, 21:464, 1975.
- 102. Popowniak, K.L., Nakamoto, S., and Magnusson, M.O.: Home Dialysis: Eight Years Experience. CCQ, 42:225, 1975.

- 103. Lewis, L.M., Flechtner, T.W., Kerkay, J., Pearson, K.H., Chen, W.T., Popowniak, K.L., and Nakamoto, S.: Determination of Plasticizer Levels in Serum of Hemodialysis Patients. ASAIO 23:566, 1977.
- 104. Minamisono, T., Wada, M., Akamatsu, A., Okabe, M., Handa, Y., Morita, T., Asagami, C., Naito, H., Nakamoto, S., Lewis, L., and Mise, J.: Dyslipoproteinemia (A Remnant Lipoprotein Disease) in Uremic Patients on Hemodialysis. Clinica Chimica Acta 84:163, 1978.
- 105. Lewis, L., Flechtner, T., Kerkay, J., Pearson, K., and Nakamoto, S.: Bis(2-ethylhexyl)Phthalate Concentrations in the Serum of Hemodialysis Patients. Clinical Chemistry 24:741, 1978.
- 106. Chen, W.T., Hu, C.H., Schilz, J.R., and Nakamoto, S.: In Search of "Psoriasis Factor(s)": A New Approach by Extracorporeal Treatment. Artificial Organs 2:203, 1978.
- 107. Yoder, S., Magnusson, M., Malchesky, P., Hulsman, A., and Nakamoto, S.: Comparison of Positive Pressure Ultrafiltration versus Negative Pressure Ultrafiltration in the Hollow Fiber Artificial Kidney. ASAIO 24:458, 1978,
- 108. Chen, W.T., Chaignon, Omvik, P., Tarazi, R.C., Bravo, E.L., and Nakamoto, S.: Hemodynamic Studies in Chronic Hemodialysis Patients with Hemofiltration/ Ultrafiltration. ASAIO 24: 682, 1978.
- Malchesky, P.S., Piatkiewicz, W., Nakamoto, S., and Nose, Y.: Haemoperfusion made safe with sorbent membranes. Dialysis Transplant Nephrology 15:591, 1978.
- Chen, W.S., Kerkay, J., Pearson, K.H., Paganini, E.P., and Nakamoto, S.: Tissue analysis of plasticizer in dogs. Proc. Clin Dial Transp Forum 8:113, 1979.
- 111. Paganini, E.P., Fouad, F., Tarazi, R.C., Bravo, E.L., and Nakamoto, S: Hemodynamics of isolated ultrafiltration in chronic hemodialysis patients ASAIO 25:422, 1979.
- 112. Chen, W.S., Kerkay, J., Pearson, K.H., Paganini, E.P., and Nakamoto, S: Determination of urinary Bis(2-Ethylehexyl)Phthalate levels in non-uremic subjects by gas chromatography. Analytical Letters 12:1501, 1979.
- 113. Chen, W.S., Rerkay, J., Pearson, K.H., Paganini, E.P., and Nakamoto, S.: Bis(2-Ethylhexyl)phthalate (DEHP) analysis in tissue, uremic subjects, hemodialysis. Analytical Letters, 12:1517, 1979.
- 114. Kerkay, J., and Nakamoto, S.: Plasticizers and the ur-mic patients An Editorial. The International Journal of Artificial Organs. 2:107, 1979.
- 115. Cnang, K., Paganini, E., Becker, J.M., Steck, W.D., Bailin, P.L., and Nakamoto, S: Leukocyte counts and arterial blood gases in nonreanal psoriatic patients treated with extracorporeal devices: Preliminiary report. Proc. Dialysis Transplant Forum 14:133, 1979.

116. Chen, W.S., Kerkay, J., Pearson, K.H., Paganini, E.P., Chang, K., Steck, W.D., Becker, J.M., Bailin, P.L., and Nakamoto, S.: Bis(2-3thylhexyl)phthalate level in nonuremic patients treated with extracorporeal devices. Proc. Dialysis Transplant Forum 14:189, 1979.

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- 117. Paganini, E., and Nakamoto, S.: Continuous slow ultrafiltration in oliguric acute renal failure. Trans Am Soc Artif Intern Organs, 26:201, 1980.
- 118. Pechan, W., Novick, A.C., Braun, W., Nakamoto, S., Popowniak, K., and Steinmuller, D.: Management of end stage polycystic kidney disease with renal transplantation. J. or Urology 125:622, 1981.
- 119. Popli, S., Chen, W.T., Nakarmto, S., Daugirdas, J.T., Cespedes, L.E., and Ing, T.S.: Hemodialysis ascites in anephric patients. Clinical Nephrology 15:203, 1981.
- 120. Chaignon, M., Chen, W.T., Tarazi, R., Bravo, E.L., and Nakamoto, S.: Effect of hemodialysis on blood volume distribution and cardiac output. Hypertension 3:327, 1981.
- 121. Chaignon, M., Chen, W.T., Tarazi, R.C., Nakamoto, S., and Bravo, E.: Blood pressure response to hemodialysis. Hypertension 3:333, 1981.
- 122. Steck, W.D., Nakamoto, S., Bailin, P.L., Paganini, E.P., Chang, K., Becker, J., Matkaluk, R., and Vidt, D.G. : Hemofiltration treatment of psorasis. Amer Acad of Derm 6:346, 1982.
- 123. Chaignon, M., Chen, W.T., Tarazi, R.C., Nakamoto, S., Salcedo, E.: Acute effects of hemodialysis on echographic-determined cardiac performance: Improved contractility resulting from serum increased calcium with reduced potassium despite hypovolemic-reduced cardiac output. American Heart Journal Vol. 103:374, 1982
- 124. Paganini, E.P., Flaque, J., Whitman, G., Nakamoto, S.: Amino acid balance in patients with oliguric acute renal failure undergoing slow continuous ultrafiltration (SCUF) ASAIO Vol 28:615, 1982
- 1-25. Malchesky, PS, Ellis, P, Nosse, C, Magnusson, M, Lankhorst,
  3., Wakamoto, S.: Direct Quantification of Dialysis. Dialysis
  & Transglantation, Vol II, No. 1, pp. 42-49, January 1982
- 124. Braun, WE, Phillips D., Vidt D., Novick AC, Nakamoto, S., Popowniak, K., Magnusson, M., Pohl, M., Paganini, E., Steinmuller, D, Protiva, D., Buszta, C: The Course of Coronary Artery Disease in Diabetics With and Without Renal Allografts. Transplantation Proceedings, Vol. XV, No. 1 (March), 1983.
- 127. Fouten GP, Carey WD., Tabor E., Cianflocco AJ., Nakamoto S., Smallwood LA, Gerety XJ.: Concomitant Hepatitis B Surface Antigen and Antibody in Tgirteen Patients. Annals of Internal Medicine, Vol. 99; No. 4 October 1983.

- 128. Steinmuller, D., Novick, A., Braun, W., Vidt, D. and Nakamoto, S.: Renal Transplantation of Patients on Chronic Peritoneal Dialysis. American Journal of Kidney Disease 8:436, 1984
- 129. Ellis, P., Malchesky, P., Magnusson, M., Goormastic, M. and Nakamoto, S.: Comparison of Two Methods of Kinetic Modeling. Trans Am Soc Artif Intern Organs 30:60, 1984
- 130. Paganini, E., O'Hara, P. and Nakamoto, S.: Slow Continuous Ultrafiltration in Hemodialysis-Resistant OligulicAcute Renal Failure Patients. Trans Am Soc Artif Intern Organs 30:173,1984
- 131. Klimas, V., Denny, K., Paganini, E. Graor, R., Nakamoto, S. and Young, J.: Low Dose Streptokinase Therapy for Thrombosed Arteriovenous Fistula. Trans Am Soc Artif Intern Organs 30:511, 1984
- 132. Khauli, R., Novick, A., Steinmuller, D., Braun, W., Nakamoto, S., Vidt, D., Goormastic, M., Magnusson, M., Paganini, E., Schreiber, M. and Buszta, C.: Patient Survival and Rehabilitation of Diabetics with End Stage Reanl Disease: Comparison of Therapeutic Modialities. Transplant Proc 17:178, 1985
- 133. Nakamot, S.: An Anatomy of an Artifical Kidney Unit. Japanese J of Clinical Dialysis.1:1251, 1985
- 134. Ellis, P., Sterin, G., Fatica, K., Bodnar, D., Nakamoto, S., Paganini, E. and Magnusson, M.: Obesity and Body Size as Predictors of Noncompliance. Council on Renal Nutrition Quartery. 9:9,1985
- 135. Khauli, R., Steinmuller, D., Novick, A., Buszta, C., Goormastic, M., Nakamoto, S., Vidt, D., Magnusson, M. and Paganini, E. A Critical Look at Survival of Diabetics with End Stage Renal Disease: Transplantation vs Dialysis Therapy. Transplant 41:598,1986
- 136. Paganini,E., Suhoza,S., Swann,S., Golding,L. and Nakamoto,S.: Continuous Renal Replacement Therapy in Patients withAcute Renal Dysfunction Undergoing Intraaortic Ballon Pumping and/or Left Ventricular Device Support. Trans Am Soc Artif Intern Organs 32:414,1986
- 137. Khauli, R., Novick, A., Steinmuller, D., Buszta, C., Nakamoto, S., Vidt, D., Magnusson, M., Paganini, E. and Schreiber, M. Comparioson of Renal Transplantation and Dialysis in Rehabilitation of Diabetic End Stage Renal Disease Patients. Urology 27:521, 1986
- 138. Nakashima, Y., Fouad, F., Nakamoto, S., Texter, S., Bravo, E. and Tarazi, R. Localization of Autonomic Nervous System Dysfunction in Dialysis Patients. Am J Nephrol 7:375,1987
- 139.Nakamoto, S. Coninuous Arteriovenous Hemofiltration: Overview. J of Jap Soc for Dialysis Therapy 21:91, 1988