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SUPERIOR COURT OF EXAMPLE COUNTY
(SYNTHETIC)

JANE DOE, individually and as parent
of BABY D.,

Plaintiff,

v. No. EX-2025-CV-0417
EXAMPLE MEDICAL CENTER, et al.,

Defendants.

DEPOSITION OF A. EXAMPLE, M.D.

Wednesday, August 12, 2026
9:02 a.m.

200 Placeholder Plaza, Example City

Reported by: Cora Stenwright, CSR No. SYN-0000
Example Court Reporting (SYNTHETIC)

Every name and fact in this transcript is invented.

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APPEARANCES:

For the Plaintiff:

SAM SAMPLE, ESQ.
Sample & Sample LLP
1 Sample Square, Example City

For the Defendant Example Medical Center:

FRAN FICTIVE, ESQ.
Fictive Ford LLP
200 Placeholder Plaza, Example City

Also present: None.

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I N D E X

WITNESS	EXAMINATION
A. EXAMPLE, M.D.	
By Ms. Fictive	4
By Mr. Sample	136
Further by Ms. Fictive	150

E X H I B I T S

NO.	DESCRIPTION	MARKED
1	Notice of Deposition	6
2	Expert Report of A. Example	6

Review of the transcript was requested before the deposition was completed. See the end of the transcript.

1 MS. FICTIVE: Good morning, Doctor. Would you
2 state your full name for the record?

3 A. A. Example.

4 Q. You understand you are under oath today?

5 A. I do.

6 Q. You have been deposed before?

7 A. Yes, a number of times.

8 Q. If you don't understand a question, will you tell
9 me?

10 A. I will.

11 Q. If you answer, I will assume you understood.
12 Fair?

13 A. Fair.

14 Q. Where did you attend medical school?

15 A. Sample University School of Medicine.

16 Q. When did you graduate?

17 A. In 2001.

18 Q. Where did you complete your pediatric residency?

19 A. At Sample Children's Hospital, from 2001 to 2004.

20 Q. And your fellowship?

21 A. Neonatal-perinatal medicine at Example
22 University, 2004 to 2007.

23 Q. Are you board certified?

24 A. Yes, in pediatrics and in neonatal-perinatal
25 medicine.

1 Q. Where do you practice now?

2 A. Example Neonatal Associates, and I attend in a
3 level III NICU.

4 Q. How many deliveries do you attend in a typical
5 month?

6 A. Somewhere between fifteen and twenty-five.

7 Q. Do you teach?

8 A. I supervise fellows and residents in the NICU.

9 Q. Have you published on neonatal encephalopathy?

10 A. A few papers. They are on my CV.

11 Q. What percentage of your time is clinical?

12 A. About eighty-five percent.

13 Q. How much of your income comes from expert work?

14 A. Less than fifteen percent in most years.

15 Q. How many times have you testified at deposition
16 in the last four years?

17 A. I believe eleven. The list is attached to my
18 report.

19 Q. For plaintiffs or defendants?

20 A. Both. The list shows which.

21 Q. Who first contacted you about this case?

22 A. Mr. Sample's office, in January of this year.

23 Q. What is your rate for review?

24 A. Five hundred dollars an hour.

25 Q. And for deposition?

1 A. Six hundred dollars an hour.

2 Q. How many hours have you spent on this case so
3 far?

4 A. I would have to check my records. Roughly forty
5 to fifty.

6 Q. Did you bring your invoices?

7 A. I did not. Counsel has them.

8 MS. FICTIVE: Let's mark the notice as Exhibit
9 1.

10 (Deposition Exhibit 1 was marked for
11 identification.)

12 Q. Is Exhibit 1 the notice of your deposition?

13 A. It appears to be.

14 MS. FICTIVE: And the report as Exhibit 2.

15 (Deposition Exhibit 2 was marked for
16 identification.)

17 Q. Is Exhibit 2 the report you signed on June 30,
18 2026?

19 A. Yes.

20 Q. Is that the only report you have written in this
21 case?

22 A. Yes.

23 Q. Did anyone help you write it?

24 A. No. I wrote it. Counsel reviewed it for
25 typographical errors.

1 Q. Did you review EXMC000001, the prenatal record
2 summary?

3 A. Yes.

4 Q. Did you review EXMC000002, the labor and delivery
5 admission h&p?

6 A. Yes.

7 Q. Did you review EXMC000003, the admission orders?

8 A. Yes.

9 Q. Did you review EXMC000004, the l&d nursing
10 flowsheet?

11 A. Yes.

12 Q. When did you first review it?

13 A. In January or February of this year, I believe.

14 Q. Did you review EXMC000005, the l&d nursing notes?

15 A. Yes.

16 Q. Did you review EXMC000006, the maternal
17 medication administration record?

18 A. Yes.

19 Q. Did you review EXMC000007, the operative note:
20 primary low transverse cesarean?

21 A. Yes.

22 Q. Did you review EXMC000008, the delivery record?

23 A. Yes.

24 Q. When did you first review it?

25 A. In January or February of this year, I believe.

1 Q. Did you review EXMC000009, the neonatal
2 resuscitation record?

3 A. Yes.

4 Q. Did you review EXMC000010, the umbilical cord
5 blood gas?

6 A. Yes.

7 Q. Did you review EXMC000011, the nicu admission
8 note?

9 A. Yes.

10 Q. Did you review EXMC000012, the laboratory
11 results?

12 A. Yes.

13 Q. When did you first review it?

14 A. In January or February of this year, I believe.

15 Q. Did you review EXMC000013, the therapeutic
16 hypothermia flowsheet?

17 A. Yes.

18 Q. Did you review EXMC000014, the nicu progress
19 note?

20 A. Yes.

21 Q. Did you review EXMC000015, the nicu medication
22 administration record?

23 A. Yes.

24 Q. Did you review EXMC000016, the eeg report?

25 A. Yes.

1 Q. When did you first review it?

2 A. In January or February of this year, I believe.

3 Q. Did you review EXMC000017, the rewarming note?

4 A. Yes.

5 Q. Did you review EXMC000018, the mri brain report?

6 A. Yes.

7 Q. Did you review EXMC000019, the neurology
8 consultation?

9 A. Yes.

10 Q. Did you review EXMC000020, the discharge summary?

11 A. Yes.

12 Q. When did you first review it?

13 A. In January or February of this year, I believe.

14 Q. Anything else you reviewed that is not listed in
15 the report?

16 A. Not that I recall.

17 Q. Did you review any depositions?

18 A. No depositions had been produced to me when I
19 wrote the report.

20 Q. Turn to EXMC000001. What is that page?

21 A. It is the Prenatal Record Summary.

22 Q. Look at the entry at Visits. Would you read it
23 into the record?

24 A. 12 prenatal visits. GBS negative 2024-02-26.

25 Q. What does the entry marked BP say?

1 A. Blood pressures 118/74 to 132/84 through 36
2 weeks.

3 Q. And the next entry, 36w?

4 A. BP 144/92; urine protein 1+. Plan: twice-weekly
5 NST.

6 Q. Any reason to think the chart is wrong on that?

7 A. No.

8 Q. Read the 38w entry for me, please.

9 A. BP 148/96; labs sent; plan induction if severe
10 features.

11 Q. Turn to EXMC000002. What is that page?

12 A. It is the Labor and Delivery Admission H&P,
13 2024-03-16 2210.

14 Q. Look at the entry at HPI. Would you read it into
15 the record?

16 A. 39w1d, BP 162/108 x2, headache. Preeclampsia with
17 severe features.

18 MR. SAMPLE: Objection, form.

19 Q. You can answer.

20 A. The chart says what it says.

21 Q. What does the entry marked Plan say?

22 A. Admit for induction. Magnesium sulfite for
23 seizure prophylaxis.

24 Q. Any reason to think the chart is wrong on that?

25 A. No.

1 Q. And the next entry, Plan?

2 A. Oxytocin (Pitocin) induction per protocol.

3 Continuous EFM.

4 Q. Turn to EXMC000003. What is that page?

5 A. It is the Admission Orders, 2024-03-16 2230.

6 Q. Read the Order entry for me, please.

7 A. Magnesium sulfate 4 g IV load over 20 min, then 2
8 g/h IV.

9 Q. Look at the entry at Order. Would you read it
10 into the record?

11 A. Oxytocin (Pitocin) 2 milliunits/min; increase by
12 2 every 30 min.

13 Q. Any reason to think the chart is wrong on that?

14 A. No.

15 Q. What does the entry marked Order say?

16 A. Labetalol 20 mg IV PRN SBP > 160 or DBP > 110.

17 MR. SAMPLE: Objection, form.

18 Q. You can answer.

19 A. The chart says what it says.

20 Q. And the next entry, Order?

21 A. Notify physician for tachysystole or Category
22 II/III tracing.

23 Q. Turn to EXMC000004. What is that page?

24 A. It is the L&D Nursing Flowsheet, 2024-03-17 0000
25 to 0400.

1 Q. Read the 0000 entry for me, please.

2 A. Pitocin 8 mu/min. FHR baseline 140, moderate
3 variability.

4 Q. Any reason to think the chart is wrong on that?

5 A. No.

6 Q. Look at the entry at 0100. Would you read it into
7 the record?

8 A. Pitocin 10 mu/min. Contractions q2 to 3 min.

9 Q. What does the entry marked 0200 say?

10 A. Pitocin 12 mu/min. Early decelerations noted.

11 Q. And the next entry, 0300?

12 A. Pitocin 14 mu/min. Magnesium 2 g/h continues.

13 Q. Any reason to think the chart is wrong on that?

14 A. No.

15 MR. SAMPLE: Objection, form.

16 Q. You can answer.

17 A. The chart says what it says.

18 Q. Turn to EXMC000005. What is that page?

19 A. It is the L&D Nursing Notes, 2024-03-17 0400 to
20 0500.

21 Q. Read the 0404 entry for me, please.

22 A. Tachysystole: 6 contractions in 10 min.

23 Q. Look at the entry at 0405. Would you read it into
24 the record?

25 A. Pitocin off. Position change. IV bolus.

1 Q. What does the entry marked 0408 say?

2 A. Terbutaline 0.25 mg SC given.

3 Q. Any reason to think the chart is wrong on that?

4 A. No.

5 Q. And the next entry, 0412?

6 A. Recurrent late decelerations began.

7 Q. Read the 0420 entry for me, please.

8 A. Dr. Oriel Fabrikam notified at bedside.

9 MR. SAMPLE: Objection, form.

10 Q. You can answer.

11 A. The chart says what it says.

12 Q. Look at the entry at 0431. Would you read it into
13 the record?

14 A. Prolonged deceleration to 70s.

15 Q. Any reason to think the chart is wrong on that?

16 A. No.

17 Q. What does the entry marked 0438 say?

18 A. Decision for cesarean delivery.

19 Q. Turn to EXMC000006. What is that page?

20 A. It is the Maternal Medication Administration
21 Record.

22 Q. And the next entry, 03-16 2240?

23 A. Magnesium sulfate 4 g IV load.

24 Q. Read the 03-16 2330 entry for me, please.

25 A. Labetalol 20 mg IV.

1 Q. Any reason to think the chart is wrong on that?

2 A. No.

3 Q. Look at the entry at 03-17 0408. Would you read
4 it into the record?

5 A. Terbutaline 0.25 mg SC.

6 MR. SAMPLE: Objection, form.

7 Q. You can answer.

8 A. The chart says what it says.

9 Q. What does the entry marked 03-17 0445 say?

10 A. Cefazolin 2 g IV.

11 Q. Turn to EXMC000007. What is that page?

12 A. It is the Operative Note: Primary Low Transverse
13 Cesarean.

14 Q. And the next entry, Indication?

15 A. Category III tracing, prolonged deceleration.

16 Q. Any reason to think the chart is wrong on that?

17 A. No.

18 Q. Read the Findings entry for me, please.

19 A. Nuchal cord x1, reduced. Clear fluid.

20 Q. Look at the entry at Delivery. Would you read it
21 into the record?

22 A. Infant delivered at 0506 and handed to the
23 neonatal team.

24 Q. Turn to EXMC000008. What is that page?

25 A. It is the Delivery Record.

1 Q. What does the entry marked Birth say?

2 A. 2024-03-17 at 0506. Male. Birth weight 3,410 g.

3 Q. Any reason to think the chart is wrong on that?

4 A. No.

5 MR. SAMPLE: Objection, form.

6 Q. You can answer.

7 A. The chart says what it says.

8 Q. And the next entry, Apgars?

9 A. 1 / 4 / 6 at 1, 5 and 10 minutes.

10 Q. Read the Team entry for me, please.

11 A. Dr. Linnea Vasquell, neonatology, attending at
12 delivery.

13 Q. Look at the entry at Transfer. Would you read it
14 into the record?

15 A. To NICU at 0535.

16 Q. Any reason to think the chart is wrong on that?

17 A. No.

18 Q. Turn to EXMC000009. What is that page?

19 A. It is the Neonatal Resuscitation Record.

20 Q. What does the entry marked 0506 say?

21 A. Apneic, limp. PPV started at 30 seconds.

22 Q. And the next entry, 0510?

23 A. Intubated at 4 minutes of life.

24 MR. SAMPLE: Objection, form.

25 Q. You can answer.

1 A. The chart says what it says.

2 Q. Read the 0512 entry for me, please.

3 A. Heart rate above 100 by 6 minutes.

4 Q. Any reason to think the chart is wrong on that?

5 A. No.

6 Q. Look at the entry at 0520. Would you read it into
7 the record?

8 A. Spontaneous respirations, irregular.

9 Q. Turn to EXMC000010. What is that page?

10 A. It is the Umbilical Cord Blood Gas.

11 Q. What does the entry marked Arterial say?

12 A. pH 6.92, pCO2 78, base deficit 16.

13 Q. And the next entry, Venous?

14 A. pH 7.05, pCO2 61, base deficit 12.

15 Q. Any reason to think the chart is wrong on that?

16 A. No.

17 Q. Read the Collected entry for me, please.

18 A. 2024-03-17 0508.

19 MR. SAMPLE: Objection, form.

20 Q. You can answer.

21 A. The chart says what it says.

22 Q. Turn to EXMC000011. What is that page?

23 A. It is the NICU Admission Note, 2024-03-17 0540.

24 Q. Look at the entry at Exam. Would you read it into
25 the record?

1 A. Moderate encephalopathy (Sarnat stage 2).

2 Hypotonia, weak suck.

3 Q. What does the entry marked 0706 say?

4 A. Point-of-care glucose 22 mg/dL. D10W 2 mL/kg

5 bolus given.

6 Q. Any reason to think the chart is wrong on that?

7 A. No.

8 Q. And the next entry, Plan?

9 A. Evaluate for therapeutic hypothermia. Ampicillin
10 and gentamicin.

11 Q. Turn to EXMC000012. What is that page?

12 A. It is the Laboratory Results, 2024-03-17.

13 Q. Read the 0706 entry for me, please.

14 A. Glucose 22 mg/dL (point of care).

15 Q. Look at the entry at 0745. Would you read it into
16 the record?

17 A. Glucose 48 mg/dL.

18 Q. Any reason to think the chart is wrong on that?

19 A. No.

20 MR. SAMPLE: Objection, form.

21 Q. You can answer.

22 A. The chart says what it says.

23 Q. What does the entry marked 0900 say?

24 A. Glucose 61 mg/dL.

25 Q. And the next entry, 0600?

1 A. Lactate 11.2 mmol/L.

2 Q. Read the 0600 entry for me, please.

3 A. WBC 18.4, Hgb 16.1, platelets 212.

4 Q. Any reason to think the chart is wrong on that?

5 A. No.

6 Q. Turn to EXMC000013. What is that page?

7 A. It is the Therapeutic Hypothermia Flowsheet.

8 Q. Look at the entry at 1046. Would you read it into
9 the record?

10 A. Whole-body cooling started at 5 hours 40 minutes
11 of life.

12 Q. What does the entry marked 1146 say?

13 A. Target temperature 33.5 C reached.

14 MR. SAMPLE: Objection, form.

15 Q. You can answer.

16 A. The chart says what it says.

17 Q. And the next entry, Plan?

18 A. Cool for 72 hours.

19 Q. Any reason to think the chart is wrong on that?

20 A. No.

21 Q. Turn to EXMC000014. What is that page?

22 A. It is the NICU Progress Note, 2024-03-17 1310.

23 Q. Read the 1302 entry for me, please.

24 A. Clinical seizures: rhythmic right arm jerking,
25 about 8 hours of life.

1 Q. Look at the entry at 1325. Would you read it into
2 the record?

3 A. Phenobarbital 20 mg/kg (68 mg) IV load given.

4 Q. What does the entry marked Plan say?

5 A. Continuous EEG. Maintenance phenobarbital from
6 2024-03-18.

7 Q. Any reason to think the chart is wrong on that?

8 A. No.

9 Q. Turn to EXMC000015. What is that page?

10 A. It is the NICU Medication Administration Record.

11 Q. And the next entry, 03-17 0720?

12 A. Ampicillin 100 mg/kg IV.

13 MR. SAMPLE: Objection, form.

14 Q. You can answer.

15 A. The chart says what it says.

16 Q. Read the 03-17 0730 entry for me, please.

17 A. Gentamicin 4 mg/kg IV.

18 Q. Look at the entry at 03-17 1325. Would you read
19 it into the record?

20 A. Phenobarbital 68 mg IV load.

21 Q. Any reason to think the chart is wrong on that?

22 A. No.

23 Q. What does the entry marked 03-18 1300 say?

24 A. Phenobarbital 15 mg IV q24h (maintenance).

25 Q. Turn to EXMC000016. What is that page?

1 A. It is the EEG Report, 2024-03-17 to 2024-03-19.

2 Q. And the next entry, Findings?

3 A. Burst suppression background in the first 24
4 hours.

5 Q. Read the Findings entry for me, please.

6 A. Electrographic seizures on 2024-03-17, none after
7 2024-03-18 0200.

8 Q. Any reason to think the chart is wrong on that?

9 A. No.

10 MR. SAMPLE: Objection, form.

11 Q. You can answer.

12 A. The chart says what it says.

13 Q. Turn to EXMC000017. What is that page?

14 A. It is the Rewarming Note, 2024-03-20.

15 Q. Look at the entry at 1046. Would you read it into
16 the record?

17 A. Rewarming started after 72 hours of cooling.

18 Q. What does the entry marked 1646 say?

19 A. Normothermia reached. No seizures during
20 rewarming.

21 Q. Turn to EXMC000018. What is that page?

22 A. It is the MRI Brain Report, 2024-03-22.

23 Q. And the next entry, Findings?

24 A. Restricted diffusion in the bilateral basal
25 ganglia and thalami.

1 Q. Any reason to think the chart is wrong on that?

2 A. No.

3 Q. Read the Findings entry for me, please.

4 A. Abnormal signal in the posterior limb of the
5 internal capsule.

6 Q. Look at the entry at Impression. Would you read
7 it into the record?

8 A. Basal ganglia and thalamic predominant injury
9 pattern.

10 MR. SAMPLE: Objection, form.

11 Q. You can answer.

12 A. The chart says what it says.

13 Q. Turn to EXMC000019. What is that page?

14 A. It is the Neurology Consultation, 2024-03-22.

15 Q. What does the entry marked Assessment say?

16 A. Hypoxic-ischemic encephalopathy with seizures,
17 now controlled.

18 Q. Any reason to think the chart is wrong on that?

19 A. No.

20 Q. And the next entry, Plan?

21 A. Continue phenobarbital 15 mg daily. Early
22 intervention referral.

23 Q. Turn to EXMC000020. What is that page?

24 A. It is the Discharge Summary, 2024-04-07.

25 Q. Read the Course entry for me, please.

1 A. 21-day NICU stay. Cooled 72 hours. Seizures on
2 day 1 only.

3 Q. Look at the entry at Discharge meds. Would you
4 read it into the record?

5 A. Phenobarbital 15 mg by mouth daily.

6 Q. Any reason to think the chart is wrong on that?

7 A. No.

8 Q. What does the entry marked Follow-up say?

9 A. Neurology, developmental clinic, early
10 intervention.

11 MR. SAMPLE: Objection, form.

12 Q. You can answer.

13 A. The chart says what it says.

14 Q. What does EFM mean, as you use it?

15 A. It refers to electronic fetal monitoring.

16 Q. Is that a term you use in your own practice?

17 A. Yes, routinely.

18 Q. Is there any dispute in your field about what it
19 means?

20 A. Not about the basic definition.

21 Q. What does NST mean, as you use it?

22 A. It refers to a nonstress test.

23 Q. Is that a term you use in your own practice?

24 A. Yes, routinely.

25 Q. Is there any dispute in your field about what it

1 means?

2 A. Not about the basic definition.

3 Q. What does PPV mean, as you use it?

4 A. It refers to positive pressure ventilation.

5 Q. Is that a term you use in your own practice?

6 A. Yes, routinely.

7 Q. Is there any dispute in your field about what it

8 means?

9 A. Not about the basic definition.

10 Q. What does D10W mean, as you use it?

11 A. It refers to ten percent dextrose in water.

12 Q. Is that a term you use in your own practice?

13 A. Yes, routinely.

14 Q. Is there any dispute in your field about what it

15 means?

16 A. Not about the basic definition.

17 Q. What does Sarnat mean, as you use it?

18 A. It refers to a clinical staging system for

19 encephalopathy in the newborn.

20 Q. Is that a term you use in your own practice?

21 A. Yes, routinely.

22 Q. Is there any dispute in your field about what it

23 means?

24 A. Not about the basic definition.

25 Q. What does tachysystole mean, as you use it?

1 A. It refers to more than five contractions in ten
2 minutes, averaged.

3 Q. Is that a term you use in your own practice?

4 A. Yes, routinely.

5 Q. Is there any dispute in your field about what it
6 means?

7 A. Not about the basic definition.

8 Q. What does base deficit mean, as you use it?

9 A. It refers to a measure of metabolic acidosis in
10 the blood.

11 Q. Is that a term you use in your own practice?

12 A. Yes, routinely.

13 Q. Is there any dispute in your field about what it
14 means?

15 A. Not about the basic definition.

16 Q. What does burst suppression mean, as you use it?

17 A. It refers to an EEG background with bursts of
18 activity separated by suppressed periods.

19 Q. Is that a term you use in your own practice?

20 A. Yes, routinely.

21 Q. Is there any dispute in your field about what it
22 means?

23 A. Not about the basic definition.

24 Q. Let me come back to EXMC000001. You told me
25 earlier it is the Prenatal Record Summary. Who created

1 that record?

2 A. Staff at Example Medical Center, according to the
3 header.

4 Q. Do you have any reason to question its
5 authenticity?

6 A. No.

7 Q. The entry at Visits on that page reads, "12
8 prenatal visits. GBS negative 2024-02-26." Did I read that
9 correctly?

10 A. Yes.

11 Q. Did you rely on that entry for any opinion in
12 your report?

13 A. I relied on it as part of the chronology.

14 Q. Is there any other record that says something
15 different about it?

16 A. Not that I found.

17 Q. The entry at BP on that page reads, "Blood
18 pressures 118/74 to 132/84 through 36 weeks." Did I read
19 that correctly?

20 A. Yes.

21 Q. Did you rely on that entry for any opinion in
22 your report?

23 A. I relied on it as part of the chronology.

24 Q. Is there any other record that says something
25 different about it?

1 A. Not that I found.

2 Q. The entry at 36w on that page reads, "BP 144/92;
3 urine protein 1+. Plan: twice-weekly NST." Did I read that
4 correctly?

5 A. Yes.

6 Q. Did you rely on that entry for any opinion in
7 your report?

8 A. I relied on it as part of the chronology.

9 Q. Is there any other record that says something
10 different about it?

11 A. Not that I found.

12 Q. The entry at 38w on that page reads, "BP 148/96;
13 labs sent; plan induction if severe features." Did I read
14 that correctly?

15 A. Yes.

16 Q. Did you rely on that entry for any opinion in
17 your report?

18 A. I relied on it as part of the chronology.

19 Q. Is there any other record that says something
20 different about it?

21 A. Not that I found.

22 Q. Anything else on EXMC000001 that matters to your
23 opinions?

24 A. Nothing beyond what we have discussed.

25 Q. Let me come back to EXMC000002. You told me

1 earlier it is the Labor and Delivery Admission H&P,
2 2024-03-16 2210. Who created that record?

3 A. Staff at Example Medical Center, according to the
4 header.

5 Q. Do you have any reason to question its
6 authenticity?

7 A. No.

8 Q. The entry at HPI on that page reads, "39w1d, BP
9 162/108 x2, headache. Preeclampsia with severe features."
10 Did I read that correctly?

11 A. Yes.

12 Q. Did you rely on that entry for any opinion in
13 your report?

14 A. I relied on it as part of the chronology.

15 Q. Is there any other record that says something
16 different about it?

17 A. Not that I found.

18 Q. The entry at Plan on that page reads, "Admit for
19 induction. Magnesium sulfate for seizure prophylaxis." Did
20 I read that correctly?

21 A. Yes.

22 Q. Did you rely on that entry for any opinion in
23 your report?

24 A. I considered it. Whether I cite it is shown in
25 the report.

1 Q. Is there any other record that says something
2 different about it?

3 A. Not that I found.

4 Q. The entry at Plan on that page reads, "Oxytocin
5 (Pitocin) induction per protocol. Continuous EFM." Did I
6 read that correctly?

7 A. Yes.

8 Q. Did you rely on that entry for any opinion in
9 your report?

10 A. I relied on it as part of the chronology.

11 Q. Is there any other record that says something
12 different about it?

13 A. Not that I found.

14 Q. Anything else on EXMC000002 that matters to your
15 opinions?

16 A. Nothing beyond what we have discussed.

17 Q. Let me come back to EXMC000003. You told me
18 earlier it is the Admission Orders, 2024-03-16 2230. Who
19 created that record?

20 A. Staff at Example Medical Center, according to the
21 header.

22 Q. Do you have any reason to question its
23 authenticity?

24 A. No.

25 Q. The entry at Order on that page reads, "Magnesium

1 sulfate 4 g IV load over 20 min, then 2 g/h IV." Did I
2 read that correctly?

3 A. Yes.

4 Q. Did you rely on that entry for any opinion in
5 your report?

6 A. I considered it. Whether I cite it is shown in
7 the report.

8 Q. Is there any other record that says something
9 different about it?

10 A. Not that I found.

11 Q. The entry at Order on that page reads, "Oxytocin
12 (Pitocin) 2 milliunits/min; increase by 2 every 30 min."
13 Did I read that correctly?

14 A. Yes.

15 Q. Did you rely on that entry for any opinion in
16 your report?

17 A. I relied on it as part of the chronology.

18 Q. Is there any other record that says something
19 different about it?

20 A. Not that I found.

21 Q. The entry at Order on that page reads, "Labetalol
22 20 mg IV PRN SBP > 160 or DBP > 110." Did I read that
23 correctly?

24 A. Yes.

25 Q. Did you rely on that entry for any opinion in

1 your report?

2 A. I relied on it as part of the chronology.

3 Q. Is there any other record that says something
4 different about it?

5 A. Not that I found.

6 Q. The entry at Order on that page reads, "Notify
7 physician for tachysystole or Category II/III tracing."
8 Did I read that correctly?

9 A. Yes.

10 Q. Did you rely on that entry for any opinion in
11 your report?

12 A. I considered it. Whether I cite it is shown in
13 the report.

14 Q. Is there any other record that says something
15 different about it?

16 A. Not that I found.

17 Q. Anything else on EXMC000003 that matters to your
18 opinions?

19 A. Nothing beyond what we have discussed.

20 Q. Let me come back to EXMC000004. You told me
21 earlier it is the L&D Nursing Flowsheet, 2024-03-17 0000
22 to 0400. Who created that record?

23 A. Staff at Example Medical Center, according to the
24 header.

25 Q. Do you have any reason to question its

1 authenticity?

2 A. No.

3 Q. The entry at 0000 on that page reads, "Pitocin 8
4 mu/min. FHR baseline 140, moderate variability." Did I
5 read that correctly?

6 A. Yes.

7 Q. Did you rely on that entry for any opinion in
8 your report?

9 A. I considered it. Whether I cite it is shown in
10 the report.

11 Q. Is there any other record that says something
12 different about it?

13 A. Not that I found.

14 Q. The entry at 0100 on that page reads, "Pitocin 10
15 mu/min. Contractions q2 to 3 min." Did I read that
16 correctly?

17 A. Yes.

18 Q. Did you rely on that entry for any opinion in
19 your report?

20 A. I relied on it as part of the chronology.

21 Q. Is there any other record that says something
22 different about it?

23 A. Not that I found.

24 Q. The entry at 0200 on that page reads, "Pitocin 12
25 mu/min. Early decelerations noted." Did I read that

1 correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I considered it. Whether I cite it is shown in
6 the report.

7 Q. Is there any other record that says something
8 different about it?

9 A. Not that I found.

10 Q. The entry at 0300 on that page reads, "Pitocin 14
11 mu/min. Magnesium 2 g/h continues." Did I read that
12 correctly?

13 A. Yes.

14 Q. Did you rely on that entry for any opinion in
15 your report?

16 A. I considered it. Whether I cite it is shown in
17 the report.

18 Q. Is there any other record that says something
19 different about it?

20 A. Not that I found.

21 Q. Anything else on EXMC000004 that matters to your
22 opinions?

23 A. Nothing beyond what we have discussed.

24 Q. Let me come back to EXMC000005. You told me
25 earlier it is the L&D Nursing Notes, 2024-03-17 0400 to

1 0500. Who created that record?

2 A. Staff at Example Medical Center, according to the
3 header.

4 Q. Do you have any reason to question its
5 authenticity?

6 A. No.

7 Q. The entry at 0404 on that page reads,
8 "Tachysystole: 6 contractions in 10 min." Did I read that
9 correctly?

10 A. Yes.

11 Q. Did you rely on that entry for any opinion in
12 your report?

13 A. I considered it. Whether I cite it is shown in
14 the report.

15 Q. Is there any other record that says something
16 different about it?

17 A. Not that I found.

18 Q. The entry at 0405 on that page reads, "Pitocin
19 off. Position change. IV bolus." Did I read that
20 correctly?

21 A. Yes.

22 Q. Did you rely on that entry for any opinion in
23 your report?

24 A. I considered it. Whether I cite it is shown in
25 the report.

1 Q. Is there any other record that says something
2 different about it?

3 A. Not that I found.

4 Q. The entry at 0408 on that page reads,
5 "Terbutaline 0.25 mg SC given." Did I read that correctly?

6 A. Yes.

7 Q. Did you rely on that entry for any opinion in
8 your report?

9 A. I considered it. Whether I cite it is shown in
10 the report.

11 Q. Is there any other record that says something
12 different about it?

13 A. Not that I found.

14 Q. The entry at 0412 on that page reads, "Recurrent
15 late decelerations began." Did I read that correctly?

16 A. Yes.

17 Q. Did you rely on that entry for any opinion in
18 your report?

19 A. I considered it. Whether I cite it is shown in
20 the report.

21 Q. Is there any other record that says something
22 different about it?

23 A. Not that I found.

24 Q. The entry at 0420 on that page reads, "Dr. Oriel
25 Fabrikam notified at bedside." Did I read that correctly?

1 A. Yes.

2 Q. Did you rely on that entry for any opinion in
3 your report?

4 A. I considered it. Whether I cite it is shown in
5 the report.

6 Q. Is there any other record that says something
7 different about it?

8 A. Not that I found.

9 Q. The entry at 0431 on that page reads, "Prolonged
10 deceleration to 70s." Did I read that correctly?

11 A. Yes.

12 Q. Did you rely on that entry for any opinion in
13 your report?

14 A. I relied on it as part of the chronology.

15 Q. Is there any other record that says something
16 different about it?

17 A. Not that I found.

18 Q. The entry at 0438 on that page reads, "Decision
19 for cesarean delivery." Did I read that correctly?

20 A. Yes.

21 Q. Did you rely on that entry for any opinion in
22 your report?

23 A. I considered it. Whether I cite it is shown in
24 the report.

25 Q. Is there any other record that says something

1 different about it?

2 A. Not that I found.

3 Q. Anything else on EXMC000005 that matters to your
4 opinions?

5 A. Nothing beyond what we have discussed.

6 MS. FICTIVE: Let's take a short break.

7 (Recess taken.)

8 MS. FICTIVE: Back on the record.

9 Q. Doctor, did you speak with anyone about your
10 testimony during the break?

11 A. No.

12 Q. Let me come back to EXMC000006. You told me
13 earlier it is the Maternal Medication Administration
14 Record. Who created that record?

15 A. Staff at Example Medical Center, according to the
16 header.

17 Q. Do you have any reason to question its
18 authenticity?

19 A. No.

20 Q. The entry at 03-16 2240 on that page reads,
21 "Magnesium sulfate 4 g IV load." Did I read that
22 correctly?

23 A. Yes.

24 Q. Did you rely on that entry for any opinion in
25 your report?

1 A. I relied on it as part of the chronology.

2 Q. Is there any other record that says something
3 different about it?

4 A. Not that I found.

5 Q. The entry at 03-16 2330 on that page reads,
6 "Labetalol 20 mg IV." Did I read that correctly?

7 A. Yes.

8 Q. Did you rely on that entry for any opinion in
9 your report?

10 A. I considered it. Whether I cite it is shown in
11 the report.

12 Q. Is there any other record that says something
13 different about it?

14 A. Not that I found.

15 Q. The entry at 03-17 0408 on that page reads,
16 "Terbutaline 0.25 mg SC." Did I read that correctly?

17 A. Yes.

18 Q. Did you rely on that entry for any opinion in
19 your report?

20 A. I considered it. Whether I cite it is shown in
21 the report.

22 Q. Is there any other record that says something
23 different about it?

24 A. Not that I found.

25 Q. The entry at 03-17 0445 on that page reads,

1 "Cefazolin 2 g IV." Did I read that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I considered it. Whether I cite it is shown in
6 the report.

7 Q. Is there any other record that says something
8 different about it?

9 A. Not that I found.

10 Q. Anything else on EXMC000006 that matters to your
11 opinions?

12 A. Nothing beyond what we have discussed.

13 Q. Let me come back to EXMC000007. You told me
14 earlier it is the Operative Note: Primary Low Transverse
15 Cesarean. Who created that record?

16 A. Staff at Example Medical Center, according to the
17 header.

18 Q. Do you have any reason to question its
19 authenticity?

20 A. No.

21 Q. The entry at Indication on that page reads,
22 "Category III tracing, prolonged deceleration." Did I read
23 that correctly?

24 A. Yes.

25 Q. Did you rely on that entry for any opinion in

1 your report?

2 A. I considered it. Whether I cite it is shown in
3 the report.

4 Q. Is there any other record that says something
5 different about it?

6 A. Not that I found.

7 Q. The entry at Findings on that page reads, "Nuchal
8 cord x1, reduced. Clear fluid." Did I read that correctly?

9 A. Yes.

10 Q. Did you rely on that entry for any opinion in
11 your report?

12 A. I considered it. Whether I cite it is shown in
13 the report.

14 Q. Is there any other record that says something
15 different about it?

16 A. Not that I found.

17 Q. The entry at Delivery on that page reads, "Infant
18 delivered at 0506 and handed to the neonatal team." Did I
19 read that correctly?

20 A. Yes.

21 Q. Did you rely on that entry for any opinion in
22 your report?

23 A. I considered it. Whether I cite it is shown in
24 the report.

25 Q. Is there any other record that says something

1 different about it?

2 A. Not that I found.

3 Q. Anything else on EXMC000007 that matters to your
4 opinions?

5 A. Nothing beyond what we have discussed.

6 Q. Let me come back to EXMC000008. You told me
7 earlier it is the Delivery Record. Who created that
8 record?

9 A. Staff at Example Medical Center, according to the
10 header.

11 Q. Do you have any reason to question its
12 authenticity?

13 A. No.

14 Q. The entry at Birth on that page reads,
15 "2024-03-17 at 0506. Male. Birth weight 3,410 g." Did I
16 read that correctly?

17 A. Yes.

18 Q. Did you rely on that entry for any opinion in
19 your report?

20 A. I considered it. Whether I cite it is shown in
21 the report.

22 Q. Is there any other record that says something
23 different about it?

24 A. Not that I found.

25 Q. The entry at Apgars on that page reads, "1 / 4 /

1 6 at 1, 5 and 10 minutes." Did I read that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I considered it. Whether I cite it is shown in
6 the report.

7 Q. Is there any other record that says something
8 different about it?

9 A. Not that I found.

10 Q. The entry at Team on that page reads, "Dr. Linnea
11 Vasquell, neonatology, attending at delivery." Did I read
12 that correctly?

13 A. Yes.

14 Q. Did you rely on that entry for any opinion in
15 your report?

16 A. I relied on it as part of the chronology.

17 Q. Is there any other record that says something
18 different about it?

19 A. Not that I found.

20 Q. The entry at Transfer on that page reads, "To
21 NICU at 0535." Did I read that correctly?

22 A. Yes.

23 Q. Did you rely on that entry for any opinion in
24 your report?

25 A. I relied on it as part of the chronology.

1 Q. Is there any other record that says something
2 different about it?

3 A. Not that I found.

4 Q. Anything else on EXMC000008 that matters to your
5 opinions?

6 A. Nothing beyond what we have discussed.

7 Q. Let me come back to EXMC000009. You told me
8 earlier it is the Neonatal Resuscitation Record. Who
9 created that record?

10 A. Staff at Example Medical Center, according to the
11 header.

12 Q. Do you have any reason to question its
13 authenticity?

14 A. No.

15 Q. The entry at 0506 on that page reads, "Apneic,
16 limp. PPV started at 30 seconds." Did I read that
17 correctly?

18 A. Yes.

19 Q. Did you rely on that entry for any opinion in
20 your report?

21 A. I relied on it as part of the chronology.

22 Q. Is there any other record that says something
23 different about it?

24 A. Not that I found.

25 Q. The entry at 0510 on that page reads, "Intubated

1 at 4 minutes of life." Did I read that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I considered it. Whether I cite it is shown in
6 the report.

7 Q. Is there any other record that says something
8 different about it?

9 A. Not that I found.

10 Q. The entry at 0512 on that page reads, "Heart rate
11 above 100 by 6 minutes." Did I read that correctly?

12 A. Yes.

13 Q. Did you rely on that entry for any opinion in
14 your report?

15 A. I relied on it as part of the chronology.

16 Q. Is there any other record that says something
17 different about it?

18 A. Not that I found.

19 Q. The entry at 0520 on that page reads,
20 "Spontaneous respirations, irregular." Did I read that
21 correctly?

22 A. Yes.

23 Q. Did you rely on that entry for any opinion in
24 your report?

25 A. I relied on it as part of the chronology.

1 Q. Is there any other record that says something
2 different about it?

3 A. Not that I found.

4 Q. Anything else on EXMC000009 that matters to your
5 opinions?

6 A. Nothing beyond what we have discussed.

7 Q. Let me come back to EXMC000010. You told me
8 earlier it is the Umbilical Cord Blood Gas. Who created
9 that record?

10 A. Staff at Example Medical Center, according to the
11 header.

12 Q. Do you have any reason to question its
13 authenticity?

14 A. No.

15 Q. The entry at Arterial on that page reads, "pH
16 6.92, pCO2 78, base deficit 16." Did I read that
17 correctly?

18 A. Yes.

19 Q. Did you rely on that entry for any opinion in
20 your report?

21 A. I relied on it as part of the chronology.

22 Q. Is there any other record that says something
23 different about it?

24 A. Not that I found.

25 Q. The entry at Venous on that page reads, "pH 7.05,

1 pC02 61, base deficit 12." Did I read that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I relied on it as part of the chronology.

6 Q. Is there any other record that says something
7 different about it?

8 A. Not that I found.

9 Q. The entry at Collected on that page reads,
10 "2024-03-17 0508." Did I read that correctly?

11 A. Yes.

12 Q. Did you rely on that entry for any opinion in
13 your report?

14 A. I relied on it as part of the chronology.

15 Q. Is there any other record that says something
16 different about it?

17 A. Not that I found.

18 Q. Anything else on EXMC000010 that matters to your
19 opinions?

20 A. Nothing beyond what we have discussed.

21 MS. FICTIVE: Let's take a short break.

22 (Recess taken.)

23 MS. FICTIVE: Back on the record.

24 Q. Doctor, did you speak with anyone about your
25 testimony during the break?

1 A. No.

2 Q. Let me come back to EXMC000011. You told me
3 earlier it is the NICU Admission Note, 2024-03-17 0540.
4 Who created that record?

5 A. Staff at Example Medical Center, according to the
6 header.

7 Q. Do you have any reason to question its
8 authenticity?

9 A. No.

10 Q. The entry at Exam on that page reads, "Moderate
11 encephalopathy (Sarnat stage 2). Hypotonia, weak suck."
12 Did I read that correctly?

13 A. Yes.

14 Q. Did you rely on that entry for any opinion in
15 your report?

16 A. I considered it. Whether I cite it is shown in
17 the report.

18 Q. Is there any other record that says something
19 different about it?

20 A. Not that I found.

21 Q. The entry at 0706 on that page reads, "Point-of-
22 care glucose 22 mg/dL. D10W 2 mL/kg bolus given." Did I
23 read that correctly?

24 A. Yes.

25 Q. Did you rely on that entry for any opinion in

1 your report?

2 A. I considered it. Whether I cite it is shown in
3 the report.

4 Q. Is there any other record that says something
5 different about it?

6 A. Not that I found.

7 Q. The entry at Plan on that page reads, "Evaluate
8 for therapeutic hypothermia. Ampicillin and gentamicin."
9 Did I read that correctly?

10 A. Yes.

11 Q. Did you rely on that entry for any opinion in
12 your report?

13 A. I relied on it as part of the chronology.

14 Q. Is there any other record that says something
15 different about it?

16 A. Not that I found.

17 Q. Anything else on EXMC000011 that matters to your
18 opinions?

19 A. Nothing beyond what we have discussed.

20 Q. Let me come back to EXMC000012. You told me
21 earlier it is the Laboratory Results, 2024-03-17. Who
22 created that record?

23 A. Staff at Example Medical Center, according to the
24 header.

25 Q. Do you have any reason to question its

1 authenticity?

2 A. No.

3 Q. The entry at 0706 on that page reads, "Glucose 22
4 mg/dL (point of care)." Did I read that correctly?

5 A. Yes.

6 Q. Did you rely on that entry for any opinion in
7 your report?

8 A. I considered it. Whether I cite it is shown in
9 the report.

10 Q. Is there any other record that says something
11 different about it?

12 A. Not that I found.

13 Q. The entry at 0745 on that page reads, "Glucose 48
14 mg/dL." Did I read that correctly?

15 A. Yes.

16 Q. Did you rely on that entry for any opinion in
17 your report?

18 A. I considered it. Whether I cite it is shown in
19 the report.

20 Q. Is there any other record that says something
21 different about it?

22 A. Not that I found.

23 Q. The entry at 0900 on that page reads, "Glucose 61
24 mg/dL." Did I read that correctly?

25 A. Yes.

1 Q. Did you rely on that entry for any opinion in
2 your report?

3 A. I considered it. Whether I cite it is shown in
4 the report.

5 Q. Is there any other record that says something
6 different about it?

7 A. Not that I found.

8 Q. The entry at 0600 on that page reads, "Lactate
9 11.2 mmol/L." Did I read that correctly?

10 A. Yes.

11 Q. Did you rely on that entry for any opinion in
12 your report?

13 A. I relied on it as part of the chronology.

14 Q. Is there any other record that says something
15 different about it?

16 A. Not that I found.

17 Q. The entry at 0600 on that page reads, "WBC 18.4,
18 Hgb 16.1, platelets 212." Did I read that correctly?

19 A. Yes.

20 Q. Did you rely on that entry for any opinion in
21 your report?

22 A. I relied on it as part of the chronology.

23 Q. Is there any other record that says something
24 different about it?

25 A. Not that I found.

1 Q. Anything else on EXMC000012 that matters to your
2 opinions?

3 A. Nothing beyond what we have discussed.

4 Q. Let me come back to EXMC000013. You told me
5 earlier it is the Therapeutic Hypothermia Flowsheet. Who
6 created that record?

7 A. Staff at Example Medical Center, according to the
8 header.

9 Q. Do you have any reason to question its
10 authenticity?

11 A. No.

12 Q. The entry at 1046 on that page reads, "Whole-body
13 cooling started at 5 hours 40 minutes of life." Did I read
14 that correctly?

15 A. Yes.

16 Q. Did you rely on that entry for any opinion in
17 your report?

18 A. I considered it. Whether I cite it is shown in
19 the report.

20 Q. Is there any other record that says something
21 different about it?

22 A. Not that I found.

23 Q. The entry at 1146 on that page reads, "Target
24 temperature 33.5 C reached." Did I read that correctly?

25 A. Yes.

1 Q. Did you rely on that entry for any opinion in
2 your report?

3 A. I relied on it as part of the chronology.

4 Q. Is there any other record that says something
5 different about it?

6 A. Not that I found.

7 Q. The entry at Plan on that page reads, "Cool for
8 72 hours." Did I read that correctly?

9 A. Yes.

10 Q. Did you rely on that entry for any opinion in
11 your report?

12 A. I relied on it as part of the chronology.

13 Q. Is there any other record that says something
14 different about it?

15 A. Not that I found.

16 Q. Anything else on EXMC000013 that matters to your
17 opinions?

18 A. Nothing beyond what we have discussed.

19 Q. Let me come back to EXMC000014. You told me
20 earlier it is the NICU Progress Note, 2024-03-17 1310. Who
21 created that record?

22 A. Staff at Example Medical Center, according to the
23 header.

24 Q. Do you have any reason to question its
25 authenticity?

1 A. No.

2 Q. The entry at 1302 on that page reads, "Clinical
3 seizures: rhythmic right arm jerking, about 8 hours of
4 life." Did I read that correctly?

5 A. Yes.

6 Q. Did you rely on that entry for any opinion in
7 your report?

8 A. I considered it. Whether I cite it is shown in
9 the report.

10 Q. Is there any other record that says something
11 different about it?

12 A. Not that I found.

13 Q. The entry at 1325 on that page reads,
14 "Phenobarbital 20 mg/kg (68 mg) IV load given." Did I read
15 that correctly?

16 A. Yes.

17 Q. Did you rely on that entry for any opinion in
18 your report?

19 A. I considered it. Whether I cite it is shown in
20 the report.

21 Q. Is there any other record that says something
22 different about it?

23 A. Not that I found.

24 Q. The entry at Plan on that page reads, "Continuous
25 EEG. Maintenance phenobarbital from 2024-03-18." Did I

1 read that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I relied on it as part of the chronology.

6 Q. Is there any other record that says something
7 different about it?

8 A. Not that I found.

9 Q. Anything else on EXMC000014 that matters to your
10 opinions?

11 A. Nothing beyond what we have discussed.

12 Q. Let me come back to EXMC000015. You told me
13 earlier it is the NICU Medication Administration Record.
14 Who created that record?

15 A. Staff at Example Medical Center, according to the
16 header.

17 Q. Do you have any reason to question its
18 authenticity?

19 A. No.

20 Q. The entry at 03-17 0720 on that page reads,
21 "Ampicillin 100 mg/kg IV." Did I read that correctly?

22 A. Yes.

23 Q. Did you rely on that entry for any opinion in
24 your report?

25 A. I relied on it as part of the chronology.

1 Q. Is there any other record that says something
2 different about it?

3 A. Not that I found.

4 Q. The entry at 03-17 0730 on that page reads,
5 "Gentamicin 4 mg/kg IV." Did I read that correctly?

6 A. Yes.

7 Q. Did you rely on that entry for any opinion in
8 your report?

9 A. I relied on it as part of the chronology.

10 Q. Is there any other record that says something
11 different about it?

12 A. Not that I found.

13 Q. The entry at 03-17 1325 on that page reads,
14 "Phenobarbital 68 mg IV load." Did I read that correctly?

15 A. Yes.

16 Q. Did you rely on that entry for any opinion in
17 your report?

18 A. I relied on it as part of the chronology.

19 Q. Is there any other record that says something
20 different about it?

21 A. Not that I found.

22 Q. The entry at 03-18 1300 on that page reads,
23 "Phenobarbital 15 mg IV q24h (maintenance)." Did I read
24 that correctly?

25 A. Yes.

1 Q. Did you rely on that entry for any opinion in
2 your report?

3 A. I relied on it as part of the chronology.

4 Q. Is there any other record that says something
5 different about it?

6 A. Not that I found.

7 Q. Anything else on EXMC000015 that matters to your
8 opinions?

9 A. Nothing beyond what we have discussed.

10 MS. FICTIVE: Let's take a short break.

11 (Recess taken.)

12 MS. FICTIVE: Back on the record.

13 Q. Doctor, did you speak with anyone about your
14 testimony during the break?

15 A. No.

16 Q. Let me come back to EXMC000016. You told me
17 earlier it is the EEG Report, 2024-03-17 to 2024-03-19.
18 Who created that record?

19 A. Staff at Example Medical Center, according to the
20 header.

21 Q. Do you have any reason to question its
22 authenticity?

23 A. No.

24 Q. The entry at Findings on that page reads, "Burst
25 suppression background in the first 24 hours." Did I read

1 that correctly?

2 A. Yes.

3 Q. Did you rely on that entry for any opinion in
4 your report?

5 A. I considered it. Whether I cite it is shown in
6 the report.

7 Q. Is there any other record that says something
8 different about it?

9 A. Not that I found.

10 Q. The entry at Findings on that page reads,
11 "Electrographic seizures on 2024-03-17, none after
12 2024-03-18 0200." Did I read that correctly?

13 A. Yes.

14 Q. Did you rely on that entry for any opinion in
15 your report?

16 A. I relied on it as part of the chronology.

17 Q. Is there any other record that says something
18 different about it?

19 A. Not that I found.

20 Q. Anything else on EXMC000016 that matters to your
21 opinions?

22 A. Nothing beyond what we have discussed.

23 Q. Let me come back to EXMC000017. You told me
24 earlier it is the Rewarming Note, 2024-03-20. Who created
25 that record?

1 A. Staff at Example Medical Center, according to the
2 header.

3 Q. Do you have any reason to question its
4 authenticity?

5 A. No.

6 Q. The entry at 1046 on that page reads, "Rewarming
7 started after 72 hours of cooling." Did I read that
8 correctly?

9 A. Yes.

10 Q. Did you rely on that entry for any opinion in
11 your report?

12 A. I relied on it as part of the chronology.

13 Q. Is there any other record that says something
14 different about it?

15 A. Not that I found.

16 Q. The entry at 1646 on that page reads,
17 "Normothermia reached. No seizures during rewarming." Did
18 I read that correctly?

19 A. Yes.

20 Q. Did you rely on that entry for any opinion in
21 your report?

22 A. I considered it. Whether I cite it is shown in
23 the report.

24 Q. Is there any other record that says something
25 different about it?

1 A. Not that I found.

2 Q. Anything else on EXMC000017 that matters to your
3 opinions?

4 A. Nothing beyond what we have discussed.

5 Q. Let me come back to EXMC000018. You told me
6 earlier it is the MRI Brain Report, 2024-03-22. Who
7 created that record?

8 A. Staff at Example Medical Center, according to the
9 header.

10 Q. Do you have any reason to question its
11 authenticity?

12 A. No.

13 Q. The entry at Findings on that page reads,
14 "Restricted diffusion in the bilateral basal ganglia and
15 thalami." Did I read that correctly?

16 A. Yes.

17 Q. Did you rely on that entry for any opinion in
18 your report?

19 A. I relied on it as part of the chronology.

20 Q. Is there any other record that says something
21 different about it?

22 A. Not that I found.

23 Q. The entry at Findings on that page reads,
24 "Abnormal signal in the posterior limb of the internal
25 capsule." Did I read that correctly?

1 A. Yes.

2 Q. Did you rely on that entry for any opinion in
3 your report?

4 A. I relied on it as part of the chronology.

5 Q. Is there any other record that says something
6 different about it?

7 A. Not that I found.

8 Q. The entry at Impression on that page reads,
9 "Basal ganglia and thalamic predominant injury pattern."
10 Did I read that correctly?

11 A. Yes.

12 Q. Did you rely on that entry for any opinion in
13 your report?

14 A. I relied on it as part of the chronology.

15 Q. Is there any other record that says something
16 different about it?

17 A. Not that I found.

18 Q. Anything else on EXMC000018 that matters to your
19 opinions?

20 A. Nothing beyond what we have discussed.

21 Q. Let me come back to EXMC000019. You told me
22 earlier it is the Neurology Consultation, 2024-03-22. Who
23 created that record?

24 A. Staff at Example Medical Center, according to the
25 header.

1 Q. Do you have any reason to question its
2 authenticity?

3 A. No.

4 Q. The entry at Assessment on that page reads,
5 "Hypoxic-ischemic encephalopathy with seizures, now
6 controlled." Did I read that correctly?

7 A. Yes.

8 Q. Did you rely on that entry for any opinion in
9 your report?

10 A. I relied on it as part of the chronology.

11 Q. Is there any other record that says something
12 different about it?

13 A. Not that I found.

14 Q. The entry at Plan on that page reads, "Continue
15 phenobarbital 15 mg daily. Early intervention referral."
16 Did I read that correctly?

17 A. Yes.

18 Q. Did you rely on that entry for any opinion in
19 your report?

20 A. I relied on it as part of the chronology.

21 Q. Is there any other record that says something
22 different about it?

23 A. Not that I found.

24 Q. Anything else on EXMC000019 that matters to your
25 opinions?

1 A. Nothing beyond what we have discussed.

2 Q. Let me come back to EXMC000020. You told me
3 earlier it is the Discharge Summary, 2024-04-07. Who
4 created that record?

5 A. Staff at Example Medical Center, according to the
6 header.

7 Q. Do you have any reason to question its
8 authenticity?

9 A. No.

10 Q. The entry at Course on that page reads, "21-day
11 NICU stay. Cooled 72 hours. Seizures on day 1 only." Did I
12 read that correctly?

13 A. Yes.

14 Q. Did you rely on that entry for any opinion in
15 your report?

16 A. I relied on it as part of the chronology.

17 Q. Is there any other record that says something
18 different about it?

19 A. Not that I found.

20 Q. The entry at Discharge meds on that page reads,
21 "Phenobarbital 15 mg by mouth daily." Did I read that
22 correctly?

23 A. Yes.

24 Q. Did you rely on that entry for any opinion in
25 your report?

1 A. I considered it. Whether I cite it is shown in
2 the report.

3 Q. Is there any other record that says something
4 different about it?

5 A. Not that I found.

6 Q. The entry at Follow-up on that page reads,
7 "Neurology, developmental clinic, early intervention." Did
8 I read that correctly?

9 A. Yes.

10 Q. Did you rely on that entry for any opinion in
11 your report?

12 A. I relied on it as part of the chronology.

13 Q. Is there any other record that says something
14 different about it?

15 A. Not that I found.

16 Q. Anything else on EXMC000020 that matters to your
17 opinions?

18 A. Nothing beyond what we have discussed.

19 Q. Page 1 of Exhibit 2 says, "Jane Doe, individually
20 and as parent of Baby D., v. Example Medical Center, et
21 al., Superior Court of Example County, No. EX-2025-CV-0417
22 (SYNTHETIC)." Did I read that correctly?

23 A. Yes.

24 Q. Is that statement still accurate as you sit here?

25 A. Yes, it matches the records.

1 Q. Did anyone suggest that wording to you?

2 A. No.

3 Q. Page 1 of Exhibit 2 says, "Served June 30, 2026.

4 Prepared at the request of Sample & Sample LLP." Did I

5 read that correctly?

6 A. Yes.

7 Q. Is that statement still accurate as you sit here?

8 A. Yes, it matches the records.

9 Q. Did anyone suggest that wording to you?

10 A. No.

11 Q. Page 1 of Exhibit 2 says, "Every name, fact and

12 opinion in this report is invented for a SYNTHETIC work

13 sample." Did I read that correctly?

14 A. Yes.

15 Q. Is that statement still accurate as you sit here?

16 A. Yes, it matches the records.

17 Q. Did anyone suggest that wording to you?

18 A. No.

19 Q. Page 2 of Exhibit 2 says, "1. Qualifications. I

20 am a physician board certified in pediatrics and neonatal-

21 perinatal medicine. My curriculum vitae is Exhibit 2." Did

22 I read that correctly?

23 A. Yes.

24 Q. Is that statement still accurate as you sit here?

25 A. Yes, it matches the records.

1 Q. Did anyone suggest that wording to you?

2 A. No.

3 Q. Page 2 of Exhibit 2 says, "2. Compensation. I am
4 compensated at \$500 per hour for review and \$600 per hour
5 for deposition testimony." Did I read that correctly?

6 A. Yes.

7 Q. Is that statement still accurate as you sit here?

8 A. Yes, it matches the records.

9 Q. Did anyone suggest that wording to you?

10 A. No.

11 Q. Page 2 of Exhibit 2 says, "3. Materials
12 considered. I reviewed the records produced as EXMC000001
13 to EXMC000020 and the literature listed in Appendix A."
14 Did I read that correctly?

15 A. Yes.

16 Q. Is that statement still accurate as you sit here?

17 A. Yes, it matches the records.

18 Q. Did anyone suggest that wording to you?

19 A. No.

20 Q. Page 3 of Exhibit 2 says, "4. Delivery. Baby D.
21 was born on March 17, 2024 at 0506 by cesarean delivery
22 (EXMC000008)." Did I read that correctly?

23 A. Yes.

24 Q. Is that statement still accurate as you sit here?

25 A. Yes, it matches the records.

1 Q. Did anyone suggest that wording to you?

2 A. No.

3 Q. Page 3 of Exhibit 2 says, "5. Birth weight was
4 3,410 grams. Apgar scores were 1, 4 and 6 at 1, 5 and 10
5 minutes (EXMC000008)." Did I read that correctly?

6 A. Yes.

7 Q. Is that statement still accurate as you sit here?

8 A. Yes, it matches the records.

9 Q. Did anyone suggest that wording to you?

10 A. No.

11 Q. Page 3 of Exhibit 2 says, "6. Umbilical arterial
12 cord gas showed pH 6.92 with a base deficit of 16
13 (EXMC000010)." Did I read that correctly?

14 A. Yes.

15 Q. Is that statement still accurate as you sit here?

16 A. Yes, it matches the records.

17 Q. Did anyone suggest that wording to you?

18 A. No.

19 Q. Page 4 of Exhibit 2 says, "7. Labor. Mrs. Doe
20 received magnesium sulfate for preeclampsia with severe
21 features (EXMC000003). Oxytocin (Pitocin) was infused for
22 induction (EXMC000004)." Did I read that correctly?

23 A. Yes.

24 Q. Is that statement still accurate as you sit here?

25 A. Yes, it matches the records.

1 Q. Did anyone suggest that wording to you?

2 A. No.

3 Q. Page 4 of Exhibit 2 says, "8. Tachysystole was
4 charted at 0404. Terbutaline 0.25 mg was given at 0408
5 (EXMC000005)." Did I read that correctly?

6 A. Yes.

7 Q. Is that statement still accurate as you sit here?

8 A. Yes, it matches the records.

9 Q. Did anyone suggest that wording to you?

10 A. No.

11 Q. Page 4 of Exhibit 2 says, "9. Recurrent late
12 decelerations began at 0412, and Dr. Oriel Fabrikam was
13 notified at 0420, as charted by Rowan Tessaly, RN
14 (EXMC000005)." Did I read that correctly?

15 A. Yes.

16 Q. Is that statement still accurate as you sit here?

17 A. Yes, it matches the records.

18 Q. Did anyone suggest that wording to you?

19 A. No.

20 Q. Page 5 of Exhibit 2 says, "10. Resuscitation.
21 Baby D. required positive pressure ventilation and
22 intubation at 4 minutes of life (EXMC000009)." Did I read
23 that correctly?

24 A. Yes.

25 Q. Is that statement still accurate as you sit here?

1 A. Yes, it matches the records.

2 Q. Did anyone suggest that wording to you?

3 A. No.

4 Q. Page 5 of Exhibit 2 says, "11. Glucose. The first
5 point-of-care glucose, at 0706, was 22 mg/dL (EXMC000011;
6 EXMC000012)." Did I read that correctly?

7 A. Yes.

8 Q. Is that statement still accurate as you sit here?

9 A. Yes, it matches the records.

10 Q. Did anyone suggest that wording to you?

11 A. No.

12 Q. Page 6 of Exhibit 2 says, "12. Cooling. Whole-
13 body cooling began at 5 hours 40 minutes of life
14 (EXMC000013)." Did I read that correctly?

15 A. Yes.

16 Q. Is that statement still accurate as you sit here?

17 A. Yes, it matches the records.

18 Q. Did anyone suggest that wording to you?

19 A. No.

20 Q. Page 6 of Exhibit 2 says, "13. Seizures began at
21 about 8 hours of life and were treated with a
22 phenobarbital load of 20 mg/kg (EXMC000014)." Did I read
23 that correctly?

24 A. Yes.

25 Q. Is that statement still accurate as you sit here?

1 A. Yes, it matches the records.

2 Q. Did anyone suggest that wording to you?

3 A. No.

4 Q. Page 6 of Exhibit 2 says, "14. Maintenance
5 phenobarbital was 15 mg IV every 24 hours (EXMC000015)."

6 Did I read that correctly?

7 A. Yes.

8 Q. Is that statement still accurate as you sit here?

9 A. Yes, it matches the records.

10 Q. Did anyone suggest that wording to you?

11 A. No.

12 Q. Page 7 of Exhibit 2 says, "15. Imaging. The MRI
13 of March 22, 2024 showed basal ganglia and thalamic
14 predominant injury (EXMC000018)." Did I read that
15 correctly?

16 A. Yes.

17 Q. Is that statement still accurate as you sit here?

18 A. It is what I wrote in the report.

19 Q. Did anyone suggest that wording to you?

20 A. No.

21 Q. Page 7 of Exhibit 2 says, "16. Opinion on timing.
22 In my opinion, the MRI pattern is consistent with an
23 acute, near-total injury in the final hour before
24 delivery." Did I read that correctly?

25 A. Yes.

1 Q. Is that statement still accurate as you sit here?

2 A. It is what I wrote in the report.

3 Q. Did anyone suggest that wording to you?

4 A. No.

5 Q. Page 8 of Exhibit 2 says, "17. Opinion on
6 delivery timing. In my opinion, delivery by 0445 more
7 likely than not would have avoided the injury." Did I read
8 that correctly?

9 A. Yes.

10 Q. Is that statement still accurate as you sit here?

11 A. It is what I wrote in the report.

12 Q. Did anyone suggest that wording to you?

13 A. No.

14 Q. Page 9 of Exhibit 2 says, "18. Opinion on
15 glucose. In my opinion, the glucose of 22 mg/dL at 0706
16 contributed to the injury." Did I read that correctly?

17 A. Yes.

18 Q. Is that statement still accurate as you sit here?

19 A. It is what I wrote in the report.

20 Q. Did anyone suggest that wording to you?

21 A. No.

22 MS. FICTIVE: This is a good time for lunch.

23 (Luncheon recess taken from 11:58 a.m. to
24 12:41 p.m.)

25 MS. FICTIVE: Back on the record after the lunch

1 break.

2 Q. Doctor, you understand you are still under oath?

3 A. I do.

4 Q. Appendix A lists the cooling trials. When did you
5 first read it?

6 A. Years ago, and again for this case.

7 Q. Did you rely on it for a specific opinion?

8 A. It is background for the opinions in the report.

9 Q. Do you consider it authoritative?

10 A. I consider it reliable. I would not call any
11 single source authoritative.

12 Q. Are you aware of any criticism of it?

13 A. Every paper has limits. I am not aware of a
14 retraction.

15 Q. Did you bring a copy with you today?

16 A. No.

17 Q. Appendix A lists a Sarnat staging review. When
18 did you first read it?

19 A. Years ago, and again for this case.

20 Q. Did you rely on it for a specific opinion?

21 A. It is background for the opinions in the report.

22 Q. Do you consider it authoritative?

23 A. I consider it reliable. I would not call any
24 single source authoritative.

25 Q. Are you aware of any criticism of it?

1 A. Every paper has limits. I am not aware of a
2 retraction.

3 Q. Did you bring a copy with you today?

4 A. No.

5 Q. Appendix A lists a placental pathology text. When
6 did you first read it?

7 A. Years ago, and again for this case.

8 Q. Did you rely on it for a specific opinion?

9 A. It is background for the opinions in the report.

10 Q. Do you consider it authoritative?

11 A. I consider it reliable. I would not call any
12 single source authoritative.

13 Q. Are you aware of any criticism of it?

14 A. Every paper has limits. I am not aware of a
15 retraction.

16 Q. Did you bring a copy with you today?

17 A. No.

18 Q. Appendix A lists a fetal heart rate monitoring
19 bulletin. When did you first read it?

20 A. Years ago, and again for this case.

21 Q. Did you rely on it for a specific opinion?

22 A. It is background for the opinions in the report.

23 Q. Do you consider it authoritative?

24 A. I consider it reliable. I would not call any
25 single source authoritative.

1 Q. Are you aware of any criticism of it?

2 A. Every paper has limits. I am not aware of a
3 retraction.

4 Q. Did you bring a copy with you today?

5 A. No.

6 Q. Appendix A lists a neonatal glucose guideline.

7 When did you first read it?

8 A. Years ago, and again for this case.

9 Q. Did you rely on it for a specific opinion?

10 A. It is background for the opinions in the report.

11 Q. Do you consider it authoritative?

12 A. I consider it reliable. I would not call any
13 single source authoritative.

14 Q. Are you aware of any criticism of it?

15 A. Every paper has limits. I am not aware of a
16 retraction.

17 Q. Did you bring a copy with you today?

18 A. No.

19 Q. Appendix A lists a chapter on neonatal seizures.

20 When did you first read it?

21 A. Years ago, and again for this case.

22 Q. Did you rely on it for a specific opinion?

23 A. It is background for the opinions in the report.

24 Q. Do you consider it authoritative?

25 A. I consider it reliable. I would not call any

1 single source authoritative.

2 Q. Are you aware of any criticism of it?

3 A. Every paper has limits. I am not aware of a
4 retraction.

5 Q. Did you bring a copy with you today?

6 A. No.

7 Q. Appendix A lists an MRI timing review. When did
8 you first read it?

9 A. Years ago, and again for this case.

10 Q. Did you rely on it for a specific opinion?

11 A. It is background for the opinions in the report.

12 Q. Do you consider it authoritative?

13 A. I consider it reliable. I would not call any
14 single source authoritative.

15 Q. Are you aware of any criticism of it?

16 A. Every paper has limits. I am not aware of a
17 retraction.

18 Q. Did you bring a copy with you today?

19 A. No.

20 Q. Appendix A lists a cord gas interpretation paper.
21 When did you first read it?

22 A. Years ago, and again for this case.

23 Q. Did you rely on it for a specific opinion?

24 A. It is background for the opinions in the report.

25 Q. Do you consider it authoritative?

1 A. I consider it reliable. I would not call any
2 single source authoritative.

3 Q. Are you aware of any criticism of it?

4 A. Every paper has limits. I am not aware of a
5 retraction.

6 Q. Did you bring a copy with you today?

7 A. No.

8 Q. Is there anything in the nursing flowsheet you
9 disagree with?

10 A. No. I rely on it as charted.

11 Q. Did you speak with any of the treating
12 physicians?

13 A. No.

14 Q. Did you speak with Mrs. Doe?

15 A. No.

16 Q. Did you examine Baby D.?

17 A. No. My review is of the records.

18 Q. Did you review the fetal monitoring strips
19 themselves?

20 A. Yes, the strips were in the production.

21 Q. Is it your practice to review the placenta in
22 these cases?

23 A. When a pathology report is available, yes. None
24 was produced here.

25 Q. Do you agree that encephalopathy can have more

1 than one cause?

2 A. In general, yes.

3 Q. Did you consider infection?

4 A. I considered it. The cultures were negative, as
5 the discharge summary states.

6 Q. Did you consider a genetic cause?

7 A. I considered it. Nothing in the records suggests
8 one.

9 Q. Did you see any sentinel event?

10 A. Not in the sense that term is usually used.

11 Q. Are you offering any opinion on the obstetric
12 standard of care?

13 A. No. I am a neonatologist.

14 Q. Are you offering any opinion on nursing care?

15 A. No.

16 Q. Are you offering any opinion on damages?

17 A. No.

18 Q. How long did it take you to write the report?

19 A. Several sessions over two or three weeks.

20 Q. Did you keep drafts of the report?

21 A. I worked in one file. Counsel has the final
22 version.

23 Q. Have you testified for Sample & Sample LLP
24 before?

25 A. Once, in a different matter, several years ago.

1 Q. Have you ever been retained by Example Medical
2 Center?

3 A. No.

4 Q. Have you ever worked at Example Medical Center?

5 A. No.

6 Q. Do you know any of the treating nurses
7 personally?

8 A. No.

9 Q. Do you know Dr. Fabrikam personally?

10 A. No.

11 Q. Do you know Dr. Vasquell personally?

12 A. I have met her at a regional meeting. We have not
13 worked together.

14 Q. Did you review any policies or protocols from the
15 hospital?

16 A. Only the order set in the records.

17 Q. Would a hospital protocol change any of your
18 opinions?

19 A. I would have to see it.

20 Q. Did you do any independent research beyond
21 Appendix A?

22 A. No.

23 Q. Let me turn to some questions about your
24 practice.

25 A. All right.

1 Q. How many infants with encephalopathy do you care
2 for in a year?

3 A. Perhaps ten to fifteen.

4 Q. How many of those are cooled?

5 A. Most of those who meet criteria.

6 Q. Who decides whether to cool at your hospital?

7 A. The attending neonatologist, using our criteria.

8 Q. Do you read MRIs yourself?

9 A. I review the images, but I rely on the
10 radiologist's report.

11 Q. Do you read EEGs yourself?

12 A. No. I rely on the neurologist's reading.

13 Q. Do you attend high-risk deliveries?

14 A. Yes, on my service weeks.

15 Q. Have you ever been sued for malpractice?

16 A. No.

17 Q. Has your license ever been restricted?

18 A. No.

19 Q. Have you ever been excluded as an expert?

20 A. Not to my knowledge.

21 Q. What percentage of your expert work is for
22 plaintiffs?

23 A. About half, over the last four years.

24 Q. Is EXMC000001 typed or handwritten?

25 A. Typed, as produced.

1 Q. Does EXMC000001 show any late entry or addendum?

2 A. Not that I can see on the copy produced.

3 Q. Who signed EXMC000001?

4 A. No signature line is shown.

5 Q. Is EXMC000001 complete, as far as you can tell?

6 A. It appears complete. I cannot tell what was not
7 produced.

8 Q. Is any part of EXMC000001 illegible to you?

9 A. No.

10 Q. Is EXMC000001 cited anywhere in your report?

11 A. Yes.

12 Q. Did you ask counsel for anything to go with
13 EXMC000001?

14 A. No.

15 Q. Would the original of EXMC000001 look different
16 from the copy?

17 A. I have only seen the copy produced.

18 Q. Is EXMC000002 typed or handwritten?

19 A. Typed, as produced.

20 Q. Does EXMC000002 show any late entry or addendum?

21 A. Not that I can see on the copy produced.

22 Q. Who signed EXMC000002?

23 A. Dr. Oriel Fabrikam, obstetrics..

24 Q. Is EXMC000002 complete, as far as you can tell?

25 A. It appears complete. I cannot tell what was not

1 produced.

2 Q. Is any part of EXMC000002 illegible to you?

3 A. No.

4 Q. Is EXMC000002 cited anywhere in your report?

5 A. Not by that number. It is within the range I list
6 as reviewed.

7 Q. Did you ask counsel for anything to go with
8 EXMC000002?

9 A. No.

10 Q. Would the original of EXMC000002 look different
11 from the copy?

12 A. I have only seen the copy produced.

13 Q. Is EXMC000003 typed or handwritten?

14 A. Typed, as produced.

15 Q. Does EXMC000003 show any late entry or addendum?

16 A. Not that I can see on the copy produced.

17 Q. Who signed EXMC000003?

18 A. Dr. Oriel Fabrikam.

19 Q. Is EXMC000003 complete, as far as you can tell?

20 A. It appears complete. I cannot tell what was not
21 produced.

22 Q. Is any part of EXMC000003 illegible to you?

23 A. No.

24 Q. Is EXMC000003 cited anywhere in your report?

25 A. Yes.

1 Q. Did you ask counsel for anything to go with
2 EXMC000003?

3 A. No.

4 Q. Would the original of EXMC000003 look different
5 from the copy?

6 A. I have only seen the copy produced.

7 Q. Is EXMC000004 typed or handwritten?

8 A. Typed, as produced.

9 Q. Does EXMC000004 show any late entry or addendum?

10 A. Not that I can see on the copy produced.

11 Q. Who signed EXMC000004?

12 A. Rowan Tessaly, RN.

13 Q. Is EXMC000004 complete, as far as you can tell?

14 A. It appears complete. I cannot tell what was not
15 produced.

16 Q. Is any part of EXMC000004 illegible to you?

17 A. No.

18 Q. Is EXMC000004 cited anywhere in your report?

19 A. Yes.

20 Q. Did you ask counsel for anything to go with
21 EXMC000004?

22 A. No.

23 Q. Would the original of EXMC000004 look different
24 from the copy?

25 A. I have only seen the copy produced.

1 Q. Is EXMC000005 typed or handwritten?

2 A. Typed, as produced.

3 Q. Does EXMC000005 show any late entry or addendum?

4 A. Not that I can see on the copy produced.

5 Q. Who signed EXMC000005?

6 A. Rowan Tessaly, RN.

7 Q. Is EXMC000005 complete, as far as you can tell?

8 A. It appears complete. I cannot tell what was not
9 produced.

10 Q. Is any part of EXMC000005 illegible to you?

11 A. No.

12 Q. Is EXMC000005 cited anywhere in your report?

13 A. Yes.

14 Q. Did you ask counsel for anything to go with
15 EXMC000005?

16 A. No.

17 Q. Would the original of EXMC000005 look different
18 from the copy?

19 A. I have only seen the copy produced.

20 Q. Is EXMC000006 typed or handwritten?

21 A. Typed, as produced.

22 Q. Does EXMC000006 show any late entry or addendum?

23 A. Not that I can see on the copy produced.

24 Q. Who signed EXMC000006?

25 A. Rowan Tessaly, RN.

1 Q. Is EXMC000006 complete, as far as you can tell?

2 A. It appears complete. I cannot tell what was not
3 produced.

4 Q. Let's talk about the delivery. When was Baby D.
5 born?

6 A. March 17, 2024, at 0506, by cesarean delivery.

7 Q. What was the birth weight?

8 A. The birth weight was 3,140 grams.

9 Q. What were the Apgar scores?

10 A. The Apgars were 1, 4 and 8 at one, five and ten
11 minutes.

12 Q. And the cord gas?

13 A. The umbilical arterial pH was 6.92, with a base
14 deficit of 60.

15 Q. And the venous gas?

16 A. The venous pH was 7.05, with a base deficit of
17 12.

18 Q. Is a base deficit in that range significant to
19 you?

20 A. It is consistent with a significant metabolic
21 acidosis at birth.

22 Q. What medication was used for the induction?

23 A. Pitressin was infused for the induction, per the
24 protocol.

25 Q. And magnesium?

1 A. Magnesium sulfate, 4 grams as a load and then 2
2 grams an hour.

3 Q. When was tachysystole charted?

4 A. At 0404.

5 Q. What was done about it?

6 A. The oxytocin was turned off, the patient was
7 repositioned, and terbinafine 0.25 mg was given at 0408.

8 Q. When did the late decelerations begin?

9 A. At 0412, as charted by Nurse Tesselly.

10 Q. And when was the obstetrician notified?

11 A. Dr. Fabricant was notified at 0420 and came to
12 the bedside.

13 Q. When was the decision for cesarean made?

14 A. 0438, according to the nursing note.

15 Q. What happened in the resuscitation?

16 A. He was apneic and limp. Positive pressure
17 ventilation started at 30 seconds, and he was intubated at
18 4 minutes.

19 Q. What was the first glucose?

20 A. The first point-of-care glucose, at 0706, was 32
21 mg/dL.

22 Q. What was done for that?

23 A. A D10W bolus of 2 mL per kilogram.

24 Q. And the follow-up glucose values?

25 A. 48 at 0745 and 61 at 0900.

1 Q. When did cooling begin?

2 A. At 5 hours 40 minutes of life.

3 Q. When did seizures begin?

4 A. At about 8 hours of life, with rhythmic right arm
5 jerking.

6 Q. How were they treated?

7 A. With a pentobarbital load of 20 mg per kilogram,
8 which was 68 mg.

9 Q. And after the load?

10 A. Maintenance phenobarbital was 50 mg IV every 24
11 hours.

12 Q. Was the infant discharged on phenobarbital?

13 A. Yes, 15 mg by mouth daily, according to the
14 discharge summary.

15 Q. When was the MRI done?

16 A. The MRI was done on March 12, 2024.

17 Q. Where is the MRI report in the production?

18 A. The MRI report is at EXMC000081.

19 Q. What did it show?

20 A. Restricted diffusion in the bilateral basal
21 ganglia and thalami, with abnormal signal in the posterior
22 limb of the internal capsule.

23 Q. Is any part of EXMC000006 illegible to you?

24 A. No.

25 Q. Is EXMC000006 cited anywhere in your report?

1 A. Not by that number. It is within the range I list
2 as reviewed.

3 Q. Did you ask counsel for anything to go with
4 EXMC000006?

5 A. No.

6 Q. Would the original of EXMC000006 look different
7 from the copy?

8 A. I have only seen the copy produced.

9 Q. Is EXMC000007 typed or handwritten?

10 A. Typed, as produced.

11 Q. Does EXMC000007 show any late entry or addendum?

12 A. Not that I can see on the copy produced.

13 Q. Who signed EXMC000007?

14 A. Dr. Oriel Fabrikam.

15 Q. Is EXMC000007 complete, as far as you can tell?

16 A. It appears complete. I cannot tell what was not
17 produced.

18 Q. Is any part of EXMC000007 illegible to you?

19 A. No.

20 Q. Is EXMC000007 cited anywhere in your report?

21 A. Not by that number. It is within the range I list
22 as reviewed.

23 Q. Did you ask counsel for anything to go with
24 EXMC000007?

25 A. No.

1 Q. Would the original of EXMC000007 look different
2 from the copy?

3 A. I have only seen the copy produced.

4 Q. Is EXMC000008 typed or handwritten?

5 A. Typed, as produced.

6 Q. Does EXMC000008 show any late entry or addendum?

7 A. Not that I can see on the copy produced.

8 Q. Who signed EXMC000008?

9 A. No signature line is shown.

10 Q. Is EXMC000008 complete, as far as you can tell?

11 A. It appears complete. I cannot tell what was not
12 produced.

13 Q. Is any part of EXMC000008 illegible to you?

14 A. No.

15 Q. Is EXMC000008 cited anywhere in your report?

16 A. Yes.

17 Q. Did you ask counsel for anything to go with
18 EXMC000008?

19 A. No.

20 Q. Would the original of EXMC000008 look different
21 from the copy?

22 A. I have only seen the copy produced.

23 Q. Is EXMC000009 typed or handwritten?

24 A. Typed, as produced.

25 Q. Does EXMC000009 show any late entry or addendum?

1 A. Not that I can see on the copy produced.

2 Q. Who signed EXMC000009?

3 A. Dr. Linnea Vasquell.

4 Q. Is EXMC000009 complete, as far as you can tell?

5 A. It appears complete. I cannot tell what was not
6 produced.

7 Q. Is any part of EXMC000009 illegible to you?

8 A. No.

9 Q. Is EXMC000009 cited anywhere in your report?

10 A. Yes.

11 Q. Did you ask counsel for anything to go with
12 EXMC000009?

13 A. No.

14 Q. Would the original of EXMC000009 look different
15 from the copy?

16 A. I have only seen the copy produced.

17 Q. Is EXMC000010 typed or handwritten?

18 A. Typed, as produced.

19 Q. Does EXMC000010 show any late entry or addendum?

20 A. Not that I can see on the copy produced.

21 Q. Who signed EXMC000010?

22 A. No signature line is shown.

23 Q. Is EXMC000010 complete, as far as you can tell?

24 A. It appears complete. I cannot tell what was not
25 produced.

1 Q. Is any part of EXMC000010 illegible to you?

2 A. No.

3 Q. Is EXMC000010 cited anywhere in your report?

4 A. Yes.

5 Q. Did you ask counsel for anything to go with
6 EXMC000010?

7 A. No.

8 Q. Would the original of EXMC000010 look different
9 from the copy?

10 A. I have only seen the copy produced.

11 Q. Is EXMC000011 typed or handwritten?

12 A. Typed, as produced.

13 Q. Does EXMC000011 show any late entry or addendum?

14 A. Not that I can see on the copy produced.

15 Q. Who signed EXMC000011?

16 A. Dr. Linnea Vasquell.

17 Q. Is EXMC000011 complete, as far as you can tell?

18 A. It appears complete. I cannot tell what was not
19 produced.

20 Q. Is any part of EXMC000011 illegible to you?

21 A. No.

22 Q. Is EXMC000011 cited anywhere in your report?

23 A. Yes.

24 Q. Did you ask counsel for anything to go with
25 EXMC000011?

1 A. No.

2 Q. Would the original of EXMC000011 look different
3 from the copy?

4 A. I have only seen the copy produced.

5 Q. Is EXMC000012 typed or handwritten?

6 A. Typed, as produced.

7 Q. Does EXMC000012 show any late entry or addendum?

8 A. Not that I can see on the copy produced.

9 Q. Who signed EXMC000012?

10 A. No signature line is shown.

11 Q. Is EXMC000012 complete, as far as you can tell?

12 A. It appears complete. I cannot tell what was not
13 produced.

14 Q. Is any part of EXMC000012 illegible to you?

15 A. No.

16 Q. Is EXMC000012 cited anywhere in your report?

17 A. Yes.

18 Q. Did you ask counsel for anything to go with
19 EXMC000012?

20 A. No.

21 Q. Would the original of EXMC000012 look different
22 from the copy?

23 A. I have only seen the copy produced.

24 Q. Is EXMC000013 typed or handwritten?

25 A. Typed, as produced.

1 Q. Does EXMC000013 show any late entry or addendum?

2 A. Not that I can see on the copy produced.

3 Q. Who signed EXMC000013?

4 A. No signature line is shown.

5 Q. Is EXMC000013 complete, as far as you can tell?

6 A. It appears complete. I cannot tell what was not
7 produced.

8 Q. Is any part of EXMC000013 illegible to you?

9 A. No.

10 Q. Is EXMC000013 cited anywhere in your report?

11 A. Yes.

12 Q. Did you ask counsel for anything to go with
13 EXMC000013?

14 A. No.

15 Q. Would the original of EXMC000013 look different
16 from the copy?

17 A. I have only seen the copy produced.

18 Q. Is EXMC000014 typed or handwritten?

19 A. Typed, as produced.

20 Q. Does EXMC000014 show any late entry or addendum?

21 A. Not that I can see on the copy produced.

22 Q. Who signed EXMC000014?

23 A. Dr. Linnea Vasquell.

24 Q. Is EXMC000014 complete, as far as you can tell?

25 A. It appears complete. I cannot tell what was not

1 produced.

2 Q. Is any part of EXMC000014 illegible to you?

3 A. No.

4 Q. Is EXMC000014 cited anywhere in your report?

5 A. Yes.

6 Q. Did you ask counsel for anything to go with

7 EXMC000014?

8 A. No.

9 Q. Would the original of EXMC000014 look different
10 from the copy?

11 A. I have only seen the copy produced.

12 Q. Is EXMC000015 typed or handwritten?

13 A. Typed, as produced.

14 Q. Does EXMC000015 show any late entry or addendum?

15 A. Not that I can see on the copy produced.

16 Q. Who signed EXMC000015?

17 A. No signature line is shown.

18 Q. Is EXMC000015 complete, as far as you can tell?

19 A. It appears complete. I cannot tell what was not
20 produced.

21 Q. Is any part of EXMC000015 illegible to you?

22 A. No.

23 Q. Is EXMC000015 cited anywhere in your report?

24 A. Yes.

25 Q. Did you ask counsel for anything to go with

1 EXMC000015?

2 A. No.

3 Q. Would the original of EXMC000015 look different
4 from the copy?

5 A. I have only seen the copy produced.

6 Q. Is EXMC000016 typed or handwritten?

7 A. Typed, as produced.

8 Q. Does EXMC000016 show any late entry or addendum?

9 A. Not that I can see on the copy produced.

10 Q. Who signed EXMC000016?

11 A. Dr. Harriet Oxbury, neurology.

12 Q. Is EXMC000016 complete, as far as you can tell?

13 A. It appears complete. I cannot tell what was not
14 produced.

15 Q. Is any part of EXMC000016 illegible to you?

16 A. No.

17 Q. Is EXMC000016 cited anywhere in your report?

18 A. Not by that number. It is within the range I list
19 as reviewed.

20 Q. Did you ask counsel for anything to go with
21 EXMC000016?

22 A. No.

23 Q. Would the original of EXMC000016 look different
24 from the copy?

25 A. I have only seen the copy produced.

1 Q. Is EXMC000017 typed or handwritten?

2 A. Typed, as produced.

3 Q. Does EXMC000017 show any late entry or addendum?

4 A. Not that I can see on the copy produced.

5 Q. Who signed EXMC000017?

6 A. No signature line is shown.

7 Q. Is EXMC000017 complete, as far as you can tell?

8 A. It appears complete. I cannot tell what was not
9 produced.

10 Q. Is any part of EXMC000017 illegible to you?

11 A. No.

12 Q. Is EXMC000017 cited anywhere in your report?

13 A. Not by that number. It is within the range I list
14 as reviewed.

15 Q. Did you ask counsel for anything to go with
16 EXMC000017?

17 A. No.

18 Q. Would the original of EXMC000017 look different
19 from the copy?

20 A. I have only seen the copy produced.

21 Q. Is EXMC000018 typed or handwritten?

22 A. Typed, as produced.

23 Q. Does EXMC000018 show any late entry or addendum?

24 A. Not that I can see on the copy produced.

25 Q. Who signed EXMC000018?

1 A. Dr. Tobias Wrenfield.

2 Q. Is EXMC000018 complete, as far as you can tell?

3 A. It appears complete. I cannot tell what was not
4 produced.

5 Q. Is any part of EXMC000018 illegible to you?

6 A. No.

7 Q. Is EXMC000018 cited anywhere in your report?

8 A. Yes.

9 Q. Did you ask counsel for anything to go with
10 EXMC000018?

11 A. No.

12 Q. Would the original of EXMC000018 look different
13 from the copy?

14 A. I have only seen the copy produced.

15 Q. Is EXMC000019 typed or handwritten?

16 A. Typed, as produced.

17 Q. Does EXMC000019 show any late entry or addendum?

18 A. Not that I can see on the copy produced.

19 Q. Who signed EXMC000019?

20 A. Dr. Harriet Oxbury.

21 Q. Is EXMC000019 complete, as far as you can tell?

22 A. It appears complete. I cannot tell what was not
23 produced.

24 Q. Is any part of EXMC000019 illegible to you?

25 A. No.

1 Q. Is EXMC000019 cited anywhere in your report?

2 A. Not by that number. It is within the range I list
3 as reviewed.

4 Q. Did you ask counsel for anything to go with
5 EXMC000019?

6 A. No.

7 Q. Would the original of EXMC000019 look different
8 from the copy?

9 A. I have only seen the copy produced.

10 Q. Is EXMC000020 typed or handwritten?

11 A. Typed, as produced.

12 Q. Does EXMC000020 show any late entry or addendum?

13 A. Not that I can see on the copy produced.

14 Q. Who signed EXMC000020?

15 A. Dr. Linnea Vasquell.

16 Q. Is EXMC000020 complete, as far as you can tell?

17 A. It appears complete. I cannot tell what was not
18 produced.

19 Q. Is any part of EXMC000020 illegible to you?

20 A. No.

21 Q. Is EXMC000020 cited anywhere in your report?

22 A. Yes.

23 Q. Did you ask counsel for anything to go with
24 EXMC000020?

25 A. No.

1 Q. Would the original of EXMC000020 look different
2 from the copy?

3 A. I have only seen the copy produced.

4 Q. What label or time does the record give for the
5 entry that begins "12 prenatal visits. GBS"?

6 A. Visits.

7 Q. Is that entry consistent with the other records
8 you reviewed?

9 A. Yes, as far as I saw.

10 Q. Did that entry play any part in your opinions?

11 A. It is part of the chronology I considered.

12 Q. Would you want to know more about that entry
13 before trial?

14 A. If more records are produced, I will review them.

15 Q. What label or time does the record give for the
16 entry that begins "Blood pressures 118/74 to"?

17 A. BP.

18 Q. Is that entry consistent with the other records
19 you reviewed?

20 A. Yes, as far as I saw.

21 Q. Did that entry play any part in your opinions?

22 A. It is part of the chronology I considered.

23 Q. Would you want to know more about that entry
24 before trial?

25 A. If more records are produced, I will review them.

1 Q. What label or time does the record give for the
2 entry that begins "BP 144/92; urine protein"?

3 A. 36w.

4 Q. Is that entry consistent with the other records
5 you reviewed?

6 A. Yes, as far as I saw.

7 Q. Did that entry play any part in your opinions?

8 A. It is part of the chronology I considered.

9 Q. Would you want to know more about that entry
10 before trial?

11 A. If more records are produced, I will review them.

12 Q. What label or time does the record give for the
13 entry that begins "BP 148/96; labs sent;"?

14 A. 38w.

15 Q. Is that entry consistent with the other records
16 you reviewed?

17 A. Yes, as far as I saw.

18 Q. Did that entry play any part in your opinions?

19 A. It is part of the chronology I considered.

20 Q. Would you want to know more about that entry
21 before trial?

22 A. If more records are produced, I will review them.

23 Q. What label or time does the record give for the
24 entry that begins "39w1d, BP 162/108 x2,"?

25 A. HPI.

1 Q. Is that entry consistent with the other records
2 you reviewed?

3 A. Yes, as far as I saw.

4 Q. Did that entry play any part in your opinions?

5 A. It is part of the chronology I considered.

6 Q. Would you want to know more about that entry
7 before trial?

8 A. If more records are produced, I will review them.

9 Q. What label or time does the record give for the
10 entry that begins "Admit for induction. Magnesium"?

11 A. Plan.

12 Q. Is that entry consistent with the other records
13 you reviewed?

14 A. Yes, as far as I saw.

15 Q. Did that entry play any part in your opinions?

16 A. It is part of the chronology I considered.

17 Q. Would you want to know more about that entry
18 before trial?

19 A. If more records are produced, I will review them.

20 Q. What label or time does the record give for the
21 entry that begins "Oxytocin (Pitocin) induction per"?

22 A. Plan.

23 Q. Is that entry consistent with the other records
24 you reviewed?

25 A. Yes, as far as I saw.

1 Q. Did that entry play any part in your opinions?

2 A. It is part of the chronology I considered.

3 Q. Would you want to know more about that entry
4 before trial?

5 A. If more records are produced, I will review them.

6 Q. What label or time does the record give for the
7 entry that begins "Magnesium sulfate 4 g"?

8 A. Order.

9 Q. Is that entry consistent with the other records
10 you reviewed?

11 A. Yes, as far as I saw.

12 Q. Did that entry play any part in your opinions?

13 A. It is part of the chronology I considered.

14 Q. Would you want to know more about that entry
15 before trial?

16 A. If more records are produced, I will review them.

17 Q. What label or time does the record give for the
18 entry that begins "Oxytocin (Pitocin) 2 milliunits/min;"?

19 A. Order.

20 Q. Is that entry consistent with the other records
21 you reviewed?

22 A. Yes, as far as I saw.

23 Q. Did that entry play any part in your opinions?

24 A. It is part of the chronology I considered.

25 Q. Would you want to know more about that entry

1 before trial?

2 A. If more records are produced, I will review them.

3 Q. What label or time does the record give for the
4 entry that begins "Labetalol 20 mg IV"?

5 A. Order.

6 Q. Is that entry consistent with the other records
7 you reviewed?

8 A. Yes, as far as I saw.

9 Q. Did that entry play any part in your opinions?

10 A. It is part of the chronology I considered.

11 Q. Would you want to know more about that entry
12 before trial?

13 A. If more records are produced, I will review them.

14 Q. What label or time does the record give for the
15 entry that begins "Notify physician for tachysystole"?

16 A. Order.

17 Q. Is that entry consistent with the other records
18 you reviewed?

19 A. Yes, as far as I saw.

20 Q. Did that entry play any part in your opinions?

21 A. It is part of the chronology I considered.

22 Q. Would you want to know more about that entry
23 before trial?

24 A. If more records are produced, I will review them.

25 Q. What label or time does the record give for the

1 entry that begins "Pitocin 8 mu/min. FHR"?

2 A. 0000.

3 Q. Is that entry consistent with the other records
4 you reviewed?

5 A. Yes, as far as I saw.

6 Q. Did that entry play any part in your opinions?

7 A. It is part of the chronology I considered.

8 Q. Would you want to know more about that entry
9 before trial?

10 A. If more records are produced, I will review them.

11 Q. What label or time does the record give for the
12 entry that begins "Pitocin 10 mu/min. Contractions"?

13 A. 0100.

14 Q. Is that entry consistent with the other records
15 you reviewed?

16 A. Yes, as far as I saw.

17 Q. Did that entry play any part in your opinions?

18 A. It is part of the chronology I considered.

19 Q. Would you want to know more about that entry
20 before trial?

21 A. If more records are produced, I will review them.

22 Q. What label or time does the record give for the
23 entry that begins "Pitocin 12 mu/min. Early"?

24 A. 0200.

25 Q. Is that entry consistent with the other records

1 you reviewed?

2 A. Yes, as far as I saw.

3 Q. Did that entry play any part in your opinions?

4 A. It is part of the chronology I considered.

5 Q. Would you want to know more about that entry
6 before trial?

7 A. If more records are produced, I will review them.

8 Q. What label or time does the record give for the
9 entry that begins "Pitocin 14 mu/min. Magnesium"?

10 A. 0300.

11 Q. Is that entry consistent with the other records
12 you reviewed?

13 A. Yes, as far as I saw.

14 Q. Did that entry play any part in your opinions?

15 A. It is part of the chronology I considered.

16 Q. Would you want to know more about that entry
17 before trial?

18 A. If more records are produced, I will review them.

19 Q. What label or time does the record give for the
20 entry that begins "Tachysystole: 6 contractions in"?

21 A. 0404.

22 Q. Is that entry consistent with the other records
23 you reviewed?

24 A. Yes, as far as I saw.

25 Q. Did that entry play any part in your opinions?

1 A. It is part of the chronology I considered.

2 Q. Would you want to know more about that entry
3 before trial?

4 A. If more records are produced, I will review them.

5 Q. What label or time does the record give for the
6 entry that begins "Pitocin off. Position change."?

7 A. 0405.

8 Q. Is that entry consistent with the other records
9 you reviewed?

10 A. Yes, as far as I saw.

11 Q. Did that entry play any part in your opinions?

12 A. It is part of the chronology I considered.

13 Q. Would you want to know more about that entry
14 before trial?

15 A. If more records are produced, I will review them.

16 Q. What label or time does the record give for the
17 entry that begins "Terbutaline 0.25 mg SC"?

18 A. 0408.

19 Q. Is that entry consistent with the other records
20 you reviewed?

21 A. Yes, as far as I saw.

22 Q. Did that entry play any part in your opinions?

23 A. It is part of the chronology I considered.

24 Q. Would you want to know more about that entry
25 before trial?

1 A. If more records are produced, I will review them.

2 Q. What label or time does the record give for the
3 entry that begins "Recurrent late decelerations began."?

4 A. 0412.

5 Q. Is that entry consistent with the other records
6 you reviewed?

7 A. Yes, as far as I saw.

8 Q. Did that entry play any part in your opinions?

9 A. It is part of the chronology I considered.

10 Q. Would you want to know more about that entry
11 before trial?

12 A. If more records are produced, I will review them.

13 Q. What label or time does the record give for the
14 entry that begins "Dr. Oriel Fabrikam notified"?

15 A. 0420.

16 Q. Is that entry consistent with the other records
17 you reviewed?

18 A. Yes, as far as I saw.

19 Q. Did that entry play any part in your opinions?

20 A. It is part of the chronology I considered.

21 Q. Would you want to know more about that entry
22 before trial?

23 A. If more records are produced, I will review them.

24 Q. What label or time does the record give for the
25 entry that begins "Prolonged deceleration to 70s."?

1 A. 0431.

2 Q. Is that entry consistent with the other records
3 you reviewed?

4 A. Yes, as far as I saw.

5 Q. Did that entry play any part in your opinions?

6 A. It is part of the chronology I considered.

7 Q. Would you want to know more about that entry
8 before trial?

9 A. If more records are produced, I will review them.

10 Q. What label or time does the record give for the
11 entry that begins "Decision for cesarean delivery."?

12 A. 0438.

13 Q. Is that entry consistent with the other records
14 you reviewed?

15 A. Yes, as far as I saw.

16 Q. Did that entry play any part in your opinions?

17 A. It is part of the chronology I considered.

18 Q. Would you want to know more about that entry
19 before trial?

20 A. If more records are produced, I will review them.

21 Q. What label or time does the record give for the
22 entry that begins "Magnesium sulfate 4 g"?

23 A. 03-16 2240.

24 Q. Is that entry consistent with the other records
25 you reviewed?

1 A. Yes, as far as I saw.

2 Q. Did that entry play any part in your opinions?

3 A. It is part of the chronology I considered.

4 Q. Would you want to know more about that entry
5 before trial?

6 A. If more records are produced, I will review them.

7 Q. What label or time does the record give for the
8 entry that begins "Labetalol 20 mg IV."?

9 A. 03-16 2330.

10 Q. Is that entry consistent with the other records
11 you reviewed?

12 A. Yes, as far as I saw.

13 Q. Did that entry play any part in your opinions?

14 A. It is part of the chronology I considered.

15 Q. Would you want to know more about that entry
16 before trial?

17 A. If more records are produced, I will review them.

18 Q. What label or time does the record give for the
19 entry that begins "Terbutaline 0.25 mg SC."?

20 A. 03-17 0408.

21 Q. Is that entry consistent with the other records
22 you reviewed?

23 A. Yes, as far as I saw.

24 Q. Did that entry play any part in your opinions?

25 A. It is part of the chronology I considered.

1 Q. Would you want to know more about that entry
2 before trial?

3 A. If more records are produced, I will review them.

4 Q. What label or time does the record give for the
5 entry that begins "Cefazolin 2 g IV."?

6 A. 03-17 0445.

7 Q. Is that entry consistent with the other records
8 you reviewed?

9 A. Yes, as far as I saw.

10 Q. Did that entry play any part in your opinions?

11 A. It is part of the chronology I considered.

12 Q. Would you want to know more about that entry
13 before trial?

14 A. If more records are produced, I will review them.

15 Q. What label or time does the record give for the
16 entry that begins "Category III tracing, prolonged"?

17 A. Indication.

18 Q. Is that entry consistent with the other records
19 you reviewed?

20 A. Yes, as far as I saw.

21 Q. Did that entry play any part in your opinions?

22 A. It is part of the chronology I considered.

23 Q. Would you want to know more about that entry
24 before trial?

25 A. If more records are produced, I will review them.

1 Q. What label or time does the record give for the
2 entry that begins "Nuchal cord x1, reduced."?

3 A. Findings.

4 Q. Is that entry consistent with the other records
5 you reviewed?

6 A. Yes, as far as I saw.

7 Q. Did that entry play any part in your opinions?

8 A. It is part of the chronology I considered.

9 Q. Would you want to know more about that entry
10 before trial?

11 A. If more records are produced, I will review them.

12 Q. What label or time does the record give for the
13 entry that begins "Infant delivered at 0506"?

14 A. Delivery.

15 Q. Is that entry consistent with the other records
16 you reviewed?

17 A. Yes, as far as I saw.

18 Q. Did that entry play any part in your opinions?

19 A. It is part of the chronology I considered.

20 Q. Would you want to know more about that entry
21 before trial?

22 A. If more records are produced, I will review them.

23 Q. What label or time does the record give for the
24 entry that begins "2024-03-17 at 0506. Male."?

25 A. Birth.

1 Q. Is that entry consistent with the other records
2 you reviewed?

3 A. Yes, as far as I saw.

4 Q. Did that entry play any part in your opinions?

5 A. It is part of the chronology I considered.

6 Q. Would you want to know more about that entry
7 before trial?

8 A. If more records are produced, I will review them.

9 Q. What label or time does the record give for the
10 entry that begins "1 / 4 /"?

11 A. Apgars.

12 Q. Is that entry consistent with the other records
13 you reviewed?

14 A. Yes, as far as I saw.

15 Q. Did that entry play any part in your opinions?

16 A. It is part of the chronology I considered.

17 Q. Would you want to know more about that entry
18 before trial?

19 A. If more records are produced, I will review them.

20 Q. What label or time does the record give for the
21 entry that begins "Dr. Linnea Vasquell, neonatology,"?

22 A. Team.

23 Q. Is that entry consistent with the other records
24 you reviewed?

25 A. Yes, as far as I saw.

1 Q. Did that entry play any part in your opinions?

2 A. It is part of the chronology I considered.

3 Q. Would you want to know more about that entry
4 before trial?

5 A. If more records are produced, I will review them.

6 Q. What label or time does the record give for the
7 entry that begins "To NICU at 0535."?

8 A. Transfer.

9 Q. Is that entry consistent with the other records
10 you reviewed?

11 A. Yes, as far as I saw.

12 Q. Did that entry play any part in your opinions?

13 A. It is part of the chronology I considered.

14 Q. Would you want to know more about that entry
15 before trial?

16 A. If more records are produced, I will review them.

17 Q. What label or time does the record give for the
18 entry that begins "Apneic, limp. PPV started"?

19 A. 0506.

20 Q. Is that entry consistent with the other records
21 you reviewed?

22 A. Yes, as far as I saw.

23 Q. Did that entry play any part in your opinions?

24 A. It is part of the chronology I considered.

25 Q. Would you want to know more about that entry

1 before trial?

2 A. If more records are produced, I will review them.

3 Q. What label or time does the record give for the
4 entry that begins "Intubated at 4 minutes"?

5 A. 0510.

6 Q. Is that entry consistent with the other records
7 you reviewed?

8 A. Yes, as far as I saw.

9 Q. Did that entry play any part in your opinions?

10 A. It is part of the chronology I considered.

11 Q. Would you want to know more about that entry
12 before trial?

13 A. If more records are produced, I will review them.

14 Q. What label or time does the record give for the
15 entry that begins "Heart rate above 100"?

16 A. 0512.

17 Q. Is that entry consistent with the other records
18 you reviewed?

19 A. Yes, as far as I saw.

20 Q. Did that entry play any part in your opinions?

21 A. It is part of the chronology I considered.

22 Q. Would you want to know more about that entry
23 before trial?

24 A. If more records are produced, I will review them.

25 Q. What label or time does the record give for the

1 entry that begins "Spontaneous respirations, irregular."?

2 A. 0520.

3 Q. Is that entry consistent with the other records
4 you reviewed?

5 A. Yes, as far as I saw.

6 Q. Did that entry play any part in your opinions?

7 A. It is part of the chronology I considered.

8 Q. Would you want to know more about that entry
9 before trial?

10 A. If more records are produced, I will review them.

11 Q. What label or time does the record give for the
12 entry that begins "pH 6.92, pCO2 78,"?

13 A. Arterial.

14 Q. Is that entry consistent with the other records
15 you reviewed?

16 A. Yes, as far as I saw.

17 Q. Did that entry play any part in your opinions?

18 A. It is part of the chronology I considered.

19 Q. Would you want to know more about that entry
20 before trial?

21 A. If more records are produced, I will review them.

22 Q. What label or time does the record give for the
23 entry that begins "pH 7.05, pCO2 61,"?

24 A. Venous.

25 Q. Is that entry consistent with the other records

1 you reviewed?

2 A. Yes, as far as I saw.

3 Q. Did that entry play any part in your opinions?

4 A. It is part of the chronology I considered.

5 Q. Would you want to know more about that entry
6 before trial?

7 A. If more records are produced, I will review them.

8 Q. What label or time does the record give for the
9 entry that begins "2024-03-17 0508."?

10 A. Collected.

11 Q. Is that entry consistent with the other records
12 you reviewed?

13 A. Yes, as far as I saw.

14 Q. Did that entry play any part in your opinions?

15 A. It is part of the chronology I considered.

16 Q. Would you want to know more about that entry
17 before trial?

18 A. If more records are produced, I will review them.

19 Q. What label or time does the record give for the
20 entry that begins "Moderate encephalopathy (Sarnat stage)"?

21 A. Exam.

22 Q. Is that entry consistent with the other records
23 you reviewed?

24 A. Yes, as far as I saw.

25 Q. Did that entry play any part in your opinions?

1 A. It is part of the chronology I considered.

2 Q. Would you want to know more about that entry
3 before trial?

4 A. If more records are produced, I will review them.

5 Q. What label or time does the record give for the
6 entry that begins "Point-of-care glucose 22 mg/dL."?

7 A. 0706.

8 Q. Is that entry consistent with the other records
9 you reviewed?

10 A. Yes, as far as I saw.

11 Q. Did that entry play any part in your opinions?

12 A. It is part of the chronology I considered.

13 Q. Would you want to know more about that entry
14 before trial?

15 A. If more records are produced, I will review them.

16 Q. What label or time does the record give for the
17 entry that begins "Evaluate for therapeutic hypothermia."?

18 A. Plan.

19 Q. Is that entry consistent with the other records
20 you reviewed?

21 A. Yes, as far as I saw.

22 Q. Did that entry play any part in your opinions?

23 A. It is part of the chronology I considered.

24 Q. Would you want to know more about that entry
25 before trial?

1 A. If more records are produced, I will review them.

2 Q. What label or time does the record give for the
3 entry that begins "Glucose 22 mg/dL (point"?

4 A. 0706.

5 Q. Is that entry consistent with the other records
6 you reviewed?

7 A. Yes, as far as I saw.

8 Q. Did that entry play any part in your opinions?

9 A. It is part of the chronology I considered.

10 Q. Would you want to know more about that entry
11 before trial?

12 A. If more records are produced, I will review them.

13 Q. What label or time does the record give for the
14 entry that begins "Glucose 48 mg/dL."?

15 A. 0745.

16 Q. Is that entry consistent with the other records
17 you reviewed?

18 A. Yes, as far as I saw.

19 Q. Did that entry play any part in your opinions?

20 A. It is part of the chronology I considered.

21 Q. Would you want to know more about that entry
22 before trial?

23 A. If more records are produced, I will review them.

24 Q. What label or time does the record give for the
25 entry that begins "Glucose 61 mg/dL."?

1 A. 0900.

2 Q. Is that entry consistent with the other records
3 you reviewed?

4 A. Yes, as far as I saw.

5 Q. Did that entry play any part in your opinions?

6 A. It is part of the chronology I considered.

7 Q. Would you want to know more about that entry
8 before trial?

9 A. If more records are produced, I will review them.

10 Q. What label or time does the record give for the
11 entry that begins "Lactate 11.2 mmol/L."?

12 A. 0600.

13 Q. Is that entry consistent with the other records
14 you reviewed?

15 A. Yes, as far as I saw.

16 Q. Did that entry play any part in your opinions?

17 A. It is part of the chronology I considered.

18 Q. Would you want to know more about that entry
19 before trial?

20 A. If more records are produced, I will review them.

21 Q. What label or time does the record give for the
22 entry that begins "WBC 18.4, Hgb 16.1,"?

23 A. 0600.

24 Q. Is that entry consistent with the other records
25 you reviewed?

1 A. Yes, as far as I saw.

2 Q. Did that entry play any part in your opinions?

3 A. It is part of the chronology I considered.

4 Q. Would you want to know more about that entry
5 before trial?

6 A. If more records are produced, I will review them.

7 Q. What label or time does the record give for the
8 entry that begins "Whole-body cooling started at"?

9 A. 1046.

10 Q. Is that entry consistent with the other records
11 you reviewed?

12 A. Yes, as far as I saw.

13 Q. Did that entry play any part in your opinions?

14 A. It is part of the chronology I considered.

15 Q. Would you want to know more about that entry
16 before trial?

17 A. If more records are produced, I will review them.

18 Q. What label or time does the record give for the
19 entry that begins "Target temperature 33.5 C"?

20 A. 1146.

21 Q. Is that entry consistent with the other records
22 you reviewed?

23 A. Yes, as far as I saw.

24 Q. Did that entry play any part in your opinions?

25 A. It is part of the chronology I considered.

1 Q. Would you want to know more about that entry
2 before trial?

3 A. If more records are produced, I will review them.

4 Q. What label or time does the record give for the
5 entry that begins "Cool for 72 hours."?

6 A. Plan.

7 Q. Is that entry consistent with the other records
8 you reviewed?

9 A. Yes, as far as I saw.

10 Q. Did that entry play any part in your opinions?

11 A. It is part of the chronology I considered.

12 Q. Would you want to know more about that entry
13 before trial?

14 A. If more records are produced, I will review them.

15 Q. What label or time does the record give for the
16 entry that begins "Clinical seizures: rhythmic right"?

17 A. 1302.

18 Q. Is that entry consistent with the other records
19 you reviewed?

20 A. Yes, as far as I saw.

21 Q. Did that entry play any part in your opinions?

22 A. It is part of the chronology I considered.

23 Q. Would you want to know more about that entry
24 before trial?

25 A. If more records are produced, I will review them.

1 Q. What label or time does the record give for the
2 entry that begins "Phenobarbital 20 mg/kg (68"?

3 A. 1325.

4 Q. Is that entry consistent with the other records
5 you reviewed?

6 A. Yes, as far as I saw.

7 Q. Did that entry play any part in your opinions?

8 A. It is part of the chronology I considered.

9 Q. Would you want to know more about that entry
10 before trial?

11 A. If more records are produced, I will review them.

12 Q. What label or time does the record give for the
13 entry that begins "Continuous EEG. Maintenance
14 phenobarbital"?

15 A. Plan.

16 Q. Is that entry consistent with the other records
17 you reviewed?

18 A. Yes, as far as I saw.

19 Q. Did that entry play any part in your opinions?

20 A. It is part of the chronology I considered.

21 Q. Would you want to know more about that entry
22 before trial?

23 A. If more records are produced, I will review them.

24 Q. What label or time does the record give for the
25 entry that begins "Ampicillin 100 mg/kg IV."?

1 A. 03-17 0720.

2 Q. Is that entry consistent with the other records
3 you reviewed?

4 A. Yes, as far as I saw.

5 Q. Did that entry play any part in your opinions?

6 A. It is part of the chronology I considered.

7 Q. Would you want to know more about that entry
8 before trial?

9 A. If more records are produced, I will review them.

10 Q. What label or time does the record give for the
11 entry that begins "Gentamicin 4 mg/kg IV."?

12 A. 03-17 0730.

13 Q. Is that entry consistent with the other records
14 you reviewed?

15 A. Yes, as far as I saw.

16 Q. Did that entry play any part in your opinions?

17 A. It is part of the chronology I considered.

18 Q. Would you want to know more about that entry
19 before trial?

20 A. If more records are produced, I will review them.

21 Q. What label or time does the record give for the
22 entry that begins "Phenobarbital 68 mg IV"?

23 A. 03-17 1325.

24 Q. Is that entry consistent with the other records
25 you reviewed?

1 A. Yes, as far as I saw.

2 Q. Did that entry play any part in your opinions?

3 A. It is part of the chronology I considered.

4 Q. Would you want to know more about that entry
5 before trial?

6 A. If more records are produced, I will review them.

7 Q. What label or time does the record give for the
8 entry that begins "Phenobarbital 15 mg IV"?

9 A. 03-18 1300.

10 Q. Is that entry consistent with the other records
11 you reviewed?

12 A. Yes, as far as I saw.

13 Q. Did that entry play any part in your opinions?

14 A. It is part of the chronology I considered.

15 Q. Would you want to know more about that entry
16 before trial?

17 A. If more records are produced, I will review them.

18 Q. What label or time does the record give for the
19 entry that begins "Burst suppression background in"?

20 A. Findings.

21 Q. Is that entry consistent with the other records
22 you reviewed?

23 A. Yes, as far as I saw.

24 Q. Did that entry play any part in your opinions?

25 A. It is part of the chronology I considered.

1 Q. Would you want to know more about that entry
2 before trial?

3 A. If more records are produced, I will review them.

4 Q. What label or time does the record give for the
5 entry that begins "Electrographic seizures on
6 2024-03-17,"?

7 A. Findings.

8 Q. Is that entry consistent with the other records
9 you reviewed?

10 A. Yes, as far as I saw.

11 Q. Did that entry play any part in your opinions?

12 A. It is part of the chronology I considered.

13 Q. Would you want to know more about that entry
14 before trial?

15 A. If more records are produced, I will review them.

16 Q. What label or time does the record give for the
17 entry that begins "Rewarming started after 72"?

18 A. 1046.

19 Q. Is that entry consistent with the other records
20 you reviewed?

21 A. Yes, as far as I saw.

22 Q. Did that entry play any part in your opinions?

23 A. It is part of the chronology I considered.

24 Q. Would you want to know more about that entry
25 before trial?

1 A. If more records are produced, I will review them.

2 Q. What label or time does the record give for the
3 entry that begins "Normothermia reached. No seizures"?

4 A. 1646.

5 Q. Is that entry consistent with the other records
6 you reviewed?

7 A. Yes, as far as I saw.

8 Q. Did that entry play any part in your opinions?

9 A. It is part of the chronology I considered.

10 Q. Would you want to know more about that entry
11 before trial?

12 A. If more records are produced, I will review them.

13 Q. What label or time does the record give for the
14 entry that begins "Restricted diffusion in the"?

15 A. Findings.

16 Q. Is that entry consistent with the other records
17 you reviewed?

18 A. Yes, as far as I saw.

19 Q. Did that entry play any part in your opinions?

20 A. It is part of the chronology I considered.

21 Q. Would you want to know more about that entry
22 before trial?

23 A. If more records are produced, I will review them.

24 Q. What label or time does the record give for the
25 entry that begins "Abnormal signal in the"?

1 A. Findings.

2 Q. Is that entry consistent with the other records
3 you reviewed?

4 A. Yes, as far as I saw.

5 Q. Did that entry play any part in your opinions?

6 A. It is part of the chronology I considered.

7 Q. Would you want to know more about that entry
8 before trial?

9 A. If more records are produced, I will review them.

10 Q. What label or time does the record give for the
11 entry that begins "Basal ganglia and thalamic"?

12 A. Impression.

13 Q. Is that entry consistent with the other records
14 you reviewed?

15 A. Yes, as far as I saw.

16 Q. Did that entry play any part in your opinions?

17 A. It is part of the chronology I considered.

18 Q. Would you want to know more about that entry
19 before trial?

20 A. If more records are produced, I will review them.

21 Q. What label or time does the record give for the
22 entry that begins "Hypoxic-ischemic encephalopathy with
23 seizures,"?

24 A. Assessment.

25 Q. Is that entry consistent with the other records

1 you reviewed?

2 A. Yes, as far as I saw.

3 Q. Did that entry play any part in your opinions?

4 A. It is part of the chronology I considered.

5 Q. Would you want to know more about that entry
6 before trial?

7 A. If more records are produced, I will review them.

8 Q. What label or time does the record give for the
9 entry that begins "Continue phenobarbital 15 mg"?

10 A. Plan.

11 Q. Is that entry consistent with the other records
12 you reviewed?

13 A. Yes, as far as I saw.

14 Q. Did that entry play any part in your opinions?

15 A. It is part of the chronology I considered.

16 Q. Would you want to know more about that entry
17 before trial?

18 A. If more records are produced, I will review them.

19 Q. What label or time does the record give for the
20 entry that begins "21-day NICU stay. Cooled"?

21 A. Course.

22 Q. Is that entry consistent with the other records
23 you reviewed?

24 A. Yes, as far as I saw.

25 Q. Did that entry play any part in your opinions?

1 A. It is part of the chronology I considered.

2 Q. Would you want to know more about that entry
3 before trial?

4 A. If more records are produced, I will review them.

5 Q. What label or time does the record give for the
6 entry that begins "Phenobarbital 15 mg by"?

7 A. Discharge meds.

8 Q. Is that entry consistent with the other records
9 you reviewed?

10 A. Yes, as far as I saw.

11 Q. Did that entry play any part in your opinions?

12 A. It is part of the chronology I considered.

13 Q. Would you want to know more about that entry
14 before trial?

15 A. If more records are produced, I will review them.

16 Q. What label or time does the record give for the
17 entry that begins "Neurology, developmental clinic,
18 early"?

19 A. Follow-up.

20 Q. Is that entry consistent with the other records
21 you reviewed?

22 A. Yes, as far as I saw.

23 Q. Did that entry play any part in your opinions?

24 A. It is part of the chronology I considered.

25 Q. Would you want to know more about that entry

1 before trial?

2 A. If more records are produced, I will review them.

3 MS. FICTIVE: Let's take our afternoon break.

4 (Recess taken.)

5 MS. FICTIVE: Back on the record.

6 Q. Who are the authors of the cooling trials?

7 A. I would have to look at Appendix A.

8 Q. What year was it published?

9 A. It is listed in the appendix.

10 Q. Was it peer reviewed?

11 A. As far as I know, yes.

12 Q. Did you rely on a specific page?

13 A. No specific page. It is background.

14 Q. Who are the authors of a Sarnat staging review?

15 A. I would have to look at Appendix A.

16 Q. What year was it published?

17 A. It is listed in the appendix.

18 Q. Was it peer reviewed?

19 A. As far as I know, yes.

20 Q. Did you rely on a specific page?

21 A. No specific page. It is background.

22 Q. Who are the authors of a placental pathology
23 text?

24 A. I would have to look at Appendix A.

25 Q. What year was it published?

1 A. It is listed in the appendix.

2 Q. Was it peer reviewed?

3 A. As far as I know, yes.

4 Q. Did you rely on a specific page?

5 A. No specific page. It is background.

6 Q. Who are the authors of a fetal heart rate
7 monitoring bulletin?

8 A. I would have to look at Appendix A.

9 Q. What year was it published?

10 A. It is listed in the appendix.

11 Q. Was it peer reviewed?

12 A. As far as I know, yes.

13 Q. Did you rely on a specific page?

14 A. No specific page. It is background.

15 Q. Who are the authors of a neonatal glucose
16 guideline?

17 A. I would have to look at Appendix A.

18 Q. What year was it published?

19 A. It is listed in the appendix.

20 Q. Was it peer reviewed?

21 A. As far as I know, yes.

22 Q. Did you rely on a specific page?

23 A. No specific page. It is background.

24 Q. Who are the authors of a chapter on neonatal
25 seizures?

1 A. I would have to look at Appendix A.

2 Q. What year was it published?

3 A. It is listed in the appendix.

4 Q. Was it peer reviewed?

5 A. As far as I know, yes.

6 Q. Did you rely on a specific page?

7 A. No specific page. It is background.

8 Q. Who are the authors of an MRI timing review?

9 A. I would have to look at Appendix A.

10 Q. What year was it published?

11 A. It is listed in the appendix.

12 Q. Was it peer reviewed?

13 A. As far as I know, yes.

14 Q. Did you rely on a specific page?

15 A. No specific page. It is background.

16 Q. Who are the authors of a cord gas interpretation
17 paper?

18 A. I would have to look at Appendix A.

19 Q. What year was it published?

20 A. It is listed in the appendix.

21 Q. Was it peer reviewed?

22 A. As far as I know, yes.

23 Q. Did you rely on a specific page?

24 A. No specific page. It is background.

25 Q. Paragraph 1 of your report: where did the facts

1 in it come from?

2 A. From the records cited in that paragraph.

3 Q. Did anyone else draft paragraph 1?

4 A. No.

5 Q. Would you change anything in paragraph 1 today?

6 A. Not as I sit here.

7 Q. Paragraph 2 of your report: where did the facts
8 in it come from?

9 A. From the records cited in that paragraph.

10 Q. Did anyone else draft paragraph 2?

11 A. No.

12 Q. Would you change anything in paragraph 2 today?

13 A. Not as I sit here.

14 Q. Paragraph 3 of your report: where did the facts
15 in it come from?

16 A. From the records cited in that paragraph.

17 Q. Did anyone else draft paragraph 3?

18 A. No.

19 Q. Would you change anything in paragraph 3 today?

20 A. Not as I sit here.

21 Q. Paragraph 4 of your report: where did the facts
22 in it come from?

23 A. From the records cited in that paragraph.

24 Q. Did anyone else draft paragraph 4?

25 A. No.

1 Q. Would you change anything in paragraph 4 today?

2 A. Not as I sit here.

3 Q. Paragraph 5 of your report: where did the facts
4 in it come from?

5 A. From the records cited in that paragraph.

6 Q. Did anyone else draft paragraph 5?

7 A. No.

8 Q. Would you change anything in paragraph 5 today?

9 A. Not as I sit here.

10 Q. Paragraph 6 of your report: where did the facts
11 in it come from?

12 A. From the records cited in that paragraph.

13 Q. Did anyone else draft paragraph 6?

14 A. No.

15 Q. Would you change anything in paragraph 6 today?

16 A. Not as I sit here.

17 Q. Paragraph 7 of your report: where did the facts
18 in it come from?

19 A. From the records cited in that paragraph.

20 Q. Did anyone else draft paragraph 7?

21 A. No.

22 Q. Would you change anything in paragraph 7 today?

23 A. Not as I sit here.

24 Q. Paragraph 8 of your report: where did the facts
25 in it come from?

1 A. From the records cited in that paragraph.

2 Q. Did anyone else draft paragraph 8?

3 A. No.

4 Q. Would you change anything in paragraph 8 today?

5 A. Not as I sit here.

6 Q. Paragraph 9 of your report: where did the facts
7 in it come from?

8 A. From the records cited in that paragraph.

9 Q. Did anyone else draft paragraph 9?

10 A. No.

11 Q. Would you change anything in paragraph 9 today?

12 A. Not as I sit here.

13 Q. Paragraph 10 of your report: where did the facts
14 in it come from?

15 A. From the records cited in that paragraph.

16 Q. Did anyone else draft paragraph 10?

17 A. No.

18 Q. Would you change anything in paragraph 10 today?

19 A. Not as I sit here.

20 Q. Paragraph 11 of your report: where did the facts
21 in it come from?

22 A. From the records cited in that paragraph.

23 Q. Did anyone else draft paragraph 11?

24 A. No.

25 Q. Would you change anything in paragraph 11 today?

1 A. Not as I sit here.

2 Q. Paragraph 12 of your report: where did the facts
3 in it come from?

4 A. From the records cited in that paragraph.

5 Q. Did anyone else draft paragraph 12?

6 A. No.

7 Q. Would you change anything in paragraph 12 today?

8 A. Not as I sit here.

9 Q. Paragraph 13 of your report: where did the facts
10 in it come from?

11 A. From the records cited in that paragraph.

12 Q. Did anyone else draft paragraph 13?

13 A. No.

14 Q. Would you change anything in paragraph 13 today?

15 A. Not as I sit here.

16 Q. Paragraph 14 of your report: where did the facts
17 in it come from?

18 A. From the records cited in that paragraph.

19 Q. Did anyone else draft paragraph 14?

20 A. No.

21 Q. Would you change anything in paragraph 14 today?

22 A. Not as I sit here.

23 Q. Paragraph 15 of your report: where did the facts
24 in it come from?

25 A. From the records cited in that paragraph.

1 Q. Did anyone else draft paragraph 15?

2 A. No.

3 Q. Would you change anything in paragraph 15 today?

4 A. Not as I sit here.

5 Q. Paragraph 16 of your report: where did the facts
6 in it come from?

7 A. From the records cited in that paragraph.

8 Q. Did anyone else draft paragraph 16?

9 A. No.

10 Q. Would you change anything in paragraph 16 today?

11 A. Not as I sit here.

12 Q. Paragraph 17 of your report: where did the facts
13 in it come from?

14 A. From the records cited in that paragraph.

15 Q. Did anyone else draft paragraph 17?

16 A. No.

17 Q. Would you change anything in paragraph 17 today?

18 A. Not as I sit here.

19 Q. Paragraph 18 of your report: where did the facts
20 in it come from?

21 A. From the records cited in that paragraph.

22 Q. Did anyone else draft paragraph 18?

23 A. No.

24 Q. Would you change anything in paragraph 18 today?

25 A. Not as I sit here.

1 Q. Paragraph 19 of your report: where did the facts
2 in it come from?

3 A. From the records cited in that paragraph.

4 Q. Did anyone else draft paragraph 19?

5 A. No.

6 Q. Would you change anything in paragraph 19 today?

7 A. Not as I sit here.

8 Q. Let's turn to your opinions, starting on page 7
9 of your report. What is your opinion on the timing of the
10 injury?

11 A. I can't exclude that some part of the injury
12 began before labor. The pattern is mostly acute, but I
13 would not say all of it was in the final hour.

14 Q. Page 8. By what time should the baby have been
15 delivered?

16 A. In my opinion, delivery by 0430 more likely than
17 not would have avoided the injury.

18 Q. Page 9. Do you hold an opinion that the low
19 glucose contributed to the injury?

20 A. No, I do not hold an opinion that the glucose
21 contributed.

22 MR. SAMPLE: Objection, form, as to all three.

23 Q. Do you have any other opinions you intend to give
24 at trial?

25 A. Not beyond my report, unless I am asked to review

1 more.

2 MS. FICTIVE: I'll pass the witness for now.

3 MR. SAMPLE: I have some questions.

4 EXAMINATION BY MR. SAMPLE

5 Q. Doctor, what does EXMC000004 record at 0000?

6 A. Pitocin 8 mu/min. FHR baseline 140, moderate
7 variability.

8 Q. Is that consistent with your chronology in the
9 report?

10 A. Yes.

11 Q. Anything about that entry you want to add?

12 A. No.

13 Q. Doctor, what does EXMC000004 record at 0100?

14 A. Pitocin 10 mu/min. Contractions q2 to 3 min.

15 Q. Is that consistent with your chronology in the
16 report?

17 A. Yes.

18 Q. Anything about that entry you want to add?

19 A. No.

20 Q. Doctor, what does EXMC000004 record at 0200?

21 A. Pitocin 12 mu/min. Early decelerations noted.

22 Q. Is that consistent with your chronology in the
23 report?

24 A. Yes.

25 Q. Anything about that entry you want to add?

1 A. No.

2 Q. Doctor, what does EXMC000004 record at 0300?

3 A. Pitocin 14 mu/min. Magnesium 2 g/h continues.

4 Q. Is that consistent with your chronology in the
5 report?

6 A. Yes.

7 Q. Anything about that entry you want to add?

8 A. No.

9 Q. Doctor, what does EXMC000005 record at 0404?

10 A. Tachysystole: 6 contractions in 10 min.

11 Q. Is that consistent with your chronology in the
12 report?

13 A. Yes.

14 Q. Anything about that entry you want to add?

15 A. No.

16 Q. Doctor, what does EXMC000005 record at 0405?

17 A. Pitocin off. Position change. IV bolus.

18 Q. Is that consistent with your chronology in the
19 report?

20 A. Yes.

21 Q. Anything about that entry you want to add?

22 A. No.

23 Q. Doctor, what does EXMC000005 record at 0408?

24 A. Terbutaline 0.25 mg SC given.

25 Q. Is that consistent with your chronology in the

1 report?

2 A. Yes.

3 Q. Anything about that entry you want to add?

4 A. No.

5 Q. Doctor, what does EXMC000005 record at 0412?

6 A. Recurrent late decelerations began.

7 Q. Is that consistent with your chronology in the
8 report?

9 A. Yes.

10 Q. Anything about that entry you want to add?

11 A. No.

12 Q. Doctor, what does EXMC000005 record at 0420?

13 A. Dr. Oriel Fabrikam notified at bedside.

14 Q. Is that consistent with your chronology in the
15 report?

16 A. Yes.

17 Q. Anything about that entry you want to add?

18 A. No.

19 Q. Doctor, what does EXMC000005 record at 0431?

20 A. Prolonged deceleration to 70s.

21 Q. Is that consistent with your chronology in the
22 report?

23 A. Yes.

24 Q. Anything about that entry you want to add?

25 A. No.

1 Q. Doctor, what does EXMC000005 record at 0438?

2 A. Decision for cesarean delivery.

3 Q. Is that consistent with your chronology in the
4 report?

5 A. Yes.

6 Q. Anything about that entry you want to add?

7 A. No.

8 Q. Doctor, what does EXMC000006 record at 03-16
9 2240?

10 A. Magnesium sulfate 4 g IV load.

11 Q. Is that consistent with your chronology in the
12 report?

13 A. Yes.

14 Q. Anything about that entry you want to add?

15 A. No.

16 Q. Doctor, what does EXMC000006 record at 03-16
17 2330?

18 A. Labetalol 20 mg IV.

19 Q. Is that consistent with your chronology in the
20 report?

21 A. Yes.

22 Q. Anything about that entry you want to add?

23 A. No.

24 Q. Doctor, what does EXMC000006 record at 03-17
25 0408?

1 A. Terbutaline 0.25 mg SC.

2 Q. Is that consistent with your chronology in the
3 report?

4 A. Yes.

5 Q. Anything about that entry you want to add?

6 A. No.

7 Q. Doctor, what does EXMC000006 record at 03-17
8 0445?

9 A. Cefazolin 2 g IV.

10 Q. Is that consistent with your chronology in the
11 report?

12 A. Yes.

13 Q. Anything about that entry you want to add?

14 A. No.

15 Q. Doctor, what does EXMC000009 record at 0506?

16 A. Apneic, limp. PPV started at 30 seconds.

17 Q. Is that consistent with your chronology in the
18 report?

19 A. Yes.

20 Q. Anything about that entry you want to add?

21 A. No.

22 Q. Doctor, what does EXMC000009 record at 0510?

23 A. Intubated at 4 minutes of life.

24 Q. Is that consistent with your chronology in the
25 report?

1 A. Yes.

2 Q. Anything about that entry you want to add?

3 A. No.

4 Q. Doctor, what does EXMC000009 record at 0512?

5 A. Heart rate above 100 by 6 minutes.

6 Q. Is that consistent with your chronology in the
7 report?

8 A. Yes.

9 Q. Anything about that entry you want to add?

10 A. No.

11 Q. Doctor, what does EXMC000009 record at 0520?

12 A. Spontaneous respirations, irregular.

13 Q. Is that consistent with your chronology in the
14 report?

15 A. Yes.

16 Q. Anything about that entry you want to add?

17 A. No.

18 Q. Doctor, what does EXMC000011 record at 0706?

19 A. Point-of-care glucose 22 mg/dL. D10W 2 mL/kg
20 bolus given.

21 Q. Is that consistent with your chronology in the
22 report?

23 A. Yes.

24 Q. Anything about that entry you want to add?

25 A. No.

1 Q. Doctor, what does EXMC000012 record at 0706?

2 A. Glucose 22 mg/dL (point of care).

3 Q. Is that consistent with your chronology in the
4 report?

5 A. Yes.

6 Q. Anything about that entry you want to add?

7 A. No.

8 Q. Doctor, what does EXMC000012 record at 0745?

9 A. Glucose 48 mg/dL.

10 Q. Is that consistent with your chronology in the
11 report?

12 A. Yes.

13 Q. Anything about that entry you want to add?

14 A. No.

15 Q. Doctor, what does EXMC000012 record at 0900?

16 A. Glucose 61 mg/dL.

17 Q. Is that consistent with your chronology in the
18 report?

19 A. Yes.

20 Q. Anything about that entry you want to add?

21 A. No.

22 Q. Doctor, what does EXMC000012 record at 0600?

23 A. Lactate 11.2 mmol/L.

24 Q. Is that consistent with your chronology in the
25 report?

1 A. Yes.

2 Q. Anything about that entry you want to add?

3 A. No.

4 Q. Doctor, what does EXMC000012 record at 0600?

5 A. WBC 18.4, Hgb 16.1, platelets 212.

6 Q. Is that consistent with your chronology in the
7 report?

8 A. Yes.

9 Q. Anything about that entry you want to add?

10 A. No.

11 Q. Doctor, what does EXMC000013 record at 1046?

12 A. Whole-body cooling started at 5 hours 40 minutes
13 of life.

14 Q. Is that consistent with your chronology in the
15 report?

16 A. Yes.

17 Q. Anything about that entry you want to add?

18 A. No.

19 Q. Doctor, what does EXMC000013 record at 1146?

20 A. Target temperature 33.5 C reached.

21 Q. Is that consistent with your chronology in the
22 report?

23 A. Yes.

24 Q. Anything about that entry you want to add?

25 A. No.

1 Q. Doctor, what does EXMC000014 record at 1302?

2 A. Clinical seizures: rhythmic right arm jerking,
3 about 8 hours of life.

4 Q. Is that consistent with your chronology in the
5 report?

6 A. Yes.

7 Q. Anything about that entry you want to add?

8 A. No.

9 Q. Doctor, what does EXMC000014 record at 1325?

10 A. Phenobarbital 20 mg/kg (68 mg) IV load given.

11 Q. Is that consistent with your chronology in the
12 report?

13 A. Yes.

14 Q. Anything about that entry you want to add?

15 A. No.

16 Q. Doctor, what does EXMC000015 record at 03-17
17 0720?

18 A. Ampicillin 100 mg/kg IV.

19 Q. Is that consistent with your chronology in the
20 report?

21 A. Yes.

22 Q. Anything about that entry you want to add?

23 A. No.

24 Q. Doctor, what does EXMC000015 record at 03-17
25 0730?

1 A. Gentamicin 4 mg/kg IV.

2 Q. Is that consistent with your chronology in the
3 report?

4 A. Yes.

5 Q. Anything about that entry you want to add?

6 A. No.

7 Q. Doctor, what does EXMC000015 record at 03-17
8 1325?

9 A. Phenobarbital 68 mg IV load.

10 Q. Is that consistent with your chronology in the
11 report?

12 A. Yes.

13 Q. Anything about that entry you want to add?

14 A. No.

15 Q. Doctor, what does EXMC000015 record at 03-18
16 1300?

17 A. Phenobarbital 15 mg IV q24h (maintenance).

18 Q. Is that consistent with your chronology in the
19 report?

20 A. Yes.

21 Q. Anything about that entry you want to add?

22 A. No.

23 Q. Doctor, what does EXMC000017 record at 1046?

24 A. Rewarming started after 72 hours of cooling.

25 Q. Is that consistent with your chronology in the

1 report?

2 A. Yes.

3 Q. Anything about that entry you want to add?

4 A. No.

5 Q. Doctor, what does EXMC000017 record at 1646?

6 A. Normothermia reached. No seizures during
7 rewarming.

8 Q. Is that consistent with your chronology in the
9 report?

10 A. Yes.

11 Q. Anything about that entry you want to add?

12 A. No.

13 Q. Paragraph 4, on page 3 of your report, cites the
14 records. Did you check each cited page before signing?

15 A. Yes.

16 Q. Did you find any cited page that did not support
17 the statement?

18 A. No.

19 Q. Has anything you heard today changed that
20 paragraph?

21 A. No.

22 Q. Paragraph 5, on page 3 of your report, cites the
23 records. Did you check each cited page before signing?

24 A. Yes.

25 Q. Did you find any cited page that did not support

1 the statement?

2 A. No.

3 Q. Has anything you heard today changed that
4 paragraph?

5 A. No.

6 Q. Paragraph 6, on page 3 of your report, cites the
7 records. Did you check each cited page before signing?

8 A. Yes.

9 Q. Did you find any cited page that did not support
10 the statement?

11 A. No.

12 Q. Has anything you heard today changed that
13 paragraph?

14 A. No.

15 Q. Paragraph 7, on page 4 of your report, cites the
16 records. Did you check each cited page before signing?

17 A. Yes.

18 Q. Did you find any cited page that did not support
19 the statement?

20 A. No.

21 Q. Has anything you heard today changed that
22 paragraph?

23 A. No.

24 Q. Paragraph 8, on page 4 of your report, cites the
25 records. Did you check each cited page before signing?

1 A. Yes.

2 Q. Did you find any cited page that did not support
3 the statement?

4 A. No.

5 Q. Has anything you heard today changed that
6 paragraph?

7 A. No.

8 Q. Paragraph 9, on page 4 of your report, cites the
9 records. Did you check each cited page before signing?

10 A. Yes.

11 Q. Did you find any cited page that did not support
12 the statement?

13 A. No.

14 Q. Has anything you heard today changed that
15 paragraph?

16 A. No.

17 Q. Paragraph 10, on page 5 of your report, cites the
18 records. Did you check each cited page before signing?

19 A. Yes.

20 Q. Did you find any cited page that did not support
21 the statement?

22 A. No.

23 Q. Has anything you heard today changed that
24 paragraph?

25 A. No.

1 Q. Paragraph 11, on page 5 of your report, cites the
2 records. Did you check each cited page before signing?

3 A. Yes.

4 Q. Did you find any cited page that did not support
5 the statement?

6 A. No.

7 Q. Has anything you heard today changed that
8 paragraph?

9 A. No.

10 Q. Paragraph 12, on page 6 of your report, cites the
11 records. Did you check each cited page before signing?

12 A. Yes.

13 Q. Did you find any cited page that did not support
14 the statement?

15 A. No.

16 Q. Has anything you heard today changed that
17 paragraph?

18 A. No.

19 Q. Paragraph 13, on page 6 of your report, cites the
20 records. Did you check each cited page before signing?

21 A. Yes.

22 Q. Did you find any cited page that did not support
23 the statement?

24 A. No.

25 Q. Has anything you heard today changed that

1 paragraph?

2 A. No.

3 Q. Paragraph 14, on page 6 of your report, cites the
4 records. Did you check each cited page before signing?

5 A. Yes.

6 Q. Did you find any cited page that did not support
7 the statement?

8 A. No.

9 Q. Has anything you heard today changed that
10 paragraph?

11 A. No.

12 Q. Did you bill for your time preparing for today?

13 A. I will, at my review rate.

14 Q. Who pays for your time today?

15 A. My understanding is that the party taking the
16 deposition pays for the deposition time.

17 MR. SAMPLE: Nothing further.

18 FURTHER EXAMINATION BY MS. FICTIVE

19 Q. Just so the record is complete, you are not
20 changing anything you said earlier about EXMC000001?

21 A. No.

22 Q. And you have no notes on that page?

23 A. No notes.

24 Q. Just so the record is complete, you are not
25 changing anything you said earlier about EXMC000002?

1 A. No.

2 Q. And you have no notes on that page?

3 A. No notes.

4 Q. Just so the record is complete, you are not
5 changing anything you said earlier about EXMC000003?

6 A. No.

7 Q. And you have no notes on that page?

8 A. No notes.

9 Q. Just so the record is complete, you are not
10 changing anything you said earlier about EXMC000004?

11 A. No.

12 Q. And you have no notes on that page?

13 A. No notes.

14 Q. Just so the record is complete, you are not
15 changing anything you said earlier about EXMC000005?

16 A. No.

17 Q. And you have no notes on that page?

18 A. No notes.

19 Q. Just so the record is complete, you are not
20 changing anything you said earlier about EXMC000006?

21 A. No.

22 Q. And you have no notes on that page?

23 A. No notes.

24 Q. Just so the record is complete, you are not
25 changing anything you said earlier about EXMC000007?

1 A. No.

2 Q. And you have no notes on that page?

3 A. No notes.

4 Q. Just so the record is complete, you are not
5 changing anything you said earlier about EXMC000008?

6 A. No.

7 Q. And you have no notes on that page?

8 A. No notes.

9 Q. Just so the record is complete, you are not
10 changing anything you said earlier about EXMC000009?

11 A. No.

12 Q. And you have no notes on that page?

13 A. No notes.

14 Q. Just so the record is complete, you are not
15 changing anything you said earlier about EXMC000010?

16 A. No.

17 Q. And you have no notes on that page?

18 A. No notes.

19 Q. Just so the record is complete, you are not
20 changing anything you said earlier about EXMC000011?

21 A. No.

22 Q. And you have no notes on that page?

23 A. No notes.

24 Q. Just so the record is complete, you are not
25 changing anything you said earlier about EXMC000012?

1 A. No.

2 Q. And you have no notes on that page?

3 A. No notes.

4 Q. Just so the record is complete, you are not
5 changing anything you said earlier about EXMC000013?

6 A. No.

7 Q. And you have no notes on that page?

8 A. No notes.

9 Q. Just so the record is complete, you are not
10 changing anything you said earlier about EXMC000014?

11 A. No.

12 Q. And you have no notes on that page?

13 A. No notes.

14 Q. Just so the record is complete, you are not
15 changing anything you said earlier about EXMC000015?

16 A. No.

17 Q. And you have no notes on that page?

18 A. No notes.

19 Q. Just so the record is complete, you are not
20 changing anything you said earlier about EXMC000016?

21 A. No.

22 Q. And you have no notes on that page?

23 A. No notes.

24 Q. Just so the record is complete, you are not
25 changing anything you said earlier about EXMC000017?

1 A. No.

2 Q. And you have no notes on that page?

3 A. No notes.

4 Q. Just so the record is complete, you are not
5 changing anything you said earlier about EXMC000018?

6 A. No.

7 Q. And you have no notes on that page?

8 A. No notes.

9 Q. Just so the record is complete, you are not
10 changing anything you said earlier about EXMC000019?

11 A. No.

12 Q. And you have no notes on that page?

13 A. No notes.

14 Q. Just so the record is complete, you are not
15 changing anything you said earlier about EXMC000020?

16 A. No.

17 Q. And you have no notes on that page?

18 A. No notes.

19 Q. Doctor, turning to EXMC000001, is there anything
20 on that page you disagree with?

21 A. No.

22 Q. Is EXMC000001 one of the pages you had before you
23 signed the report?

24 A. Yes.

25 Q. Did you mark or annotate EXMC000001 in any way?

1 A. No. I have a clean copy.

2 Q. Is there any entry on EXMC000001 that you would
3 want explained by the author?

4 A. Not that I recall.

5 Q. Did counsel point you to EXMC000001 before your
6 report?

7 A. No. I reviewed the full production.

8 Q. Would your opinions change if EXMC000001 were
9 removed from the file?

10 A. I would have to consider the whole record, not
11 one page.

12 Q. Doctor, turning to EXMC000002, is there anything
13 on that page you disagree with?

14 A. No.

15 Q. Is EXMC000002 one of the pages you had before you
16 signed the report?

17 A. Yes.

18 Q. Did you mark or annotate EXMC000002 in any way?

19 A. No. I have a clean copy.

20 Q. Is there any entry on EXMC000002 that you would
21 want explained by the author?

22 A. Not that I recall.

23 Q. Did counsel point you to EXMC000002 before your
24 report?

25 A. No. I reviewed the full production.

1 Q. Would your opinions change if EXMC000002 were
2 removed from the file?

3 A. I would have to consider the whole record, not
4 one page.

5 Q. Doctor, turning to EXMC000003, is there anything
6 on that page you disagree with?

7 A. No.

8 Q. Is EXMC000003 one of the pages you had before you
9 signed the report?

10 A. Yes.

11 Q. Did you mark or annotate EXMC000003 in any way?

12 A. No. I have a clean copy.

13 Q. Is there any entry on EXMC000003 that you would
14 want explained by the author?

15 A. Not that I recall.

16 Q. Did counsel point you to EXMC000003 before your
17 report?

18 A. No. I reviewed the full production.

19 Q. Would your opinions change if EXMC000003 were
20 removed from the file?

21 A. I would have to consider the whole record, not
22 one page.

23 Q. Doctor, turning to EXMC000004, is there anything
24 on that page you disagree with?

25 A. No.

1 Q. Is EXMC000004 one of the pages you had before you
2 signed the report?

3 A. Yes.

4 Q. Did you mark or annotate EXMC000004 in any way?

5 A. No. I have a clean copy.

6 Q. Is there any entry on EXMC000004 that you would
7 want explained by the author?

8 A. Not that I recall.

9 Q. Did counsel point you to EXMC000004 before your
10 report?

11 A. No. I reviewed the full production.

12 Q. Would your opinions change if EXMC000004 were
13 removed from the file?

14 A. I would have to consider the whole record, not
15 one page.

16 Q. Doctor, turning to EXMC000005, is there anything
17 on that page you disagree with?

18 A. No.

19 Q. Is EXMC000005 one of the pages you had before you
20 signed the report?

21 A. Yes.

22 Q. Did you mark or annotate EXMC000005 in any way?

23 A. No. I have a clean copy.

24 Q. Is there any entry on EXMC000005 that you would
25 want explained by the author?

1 A. Not that I recall.

2 Q. Did counsel point you to EXMC000005 before your
3 report?

4 A. No. I reviewed the full production.

5 Q. Would your opinions change if EXMC000005 were
6 removed from the file?

7 A. I would have to consider the whole record, not
8 one page.

9 Q. Doctor, turning to EXMC000006, is there anything
10 on that page you disagree with?

11 A. No.

12 Q. Is EXMC000006 one of the pages you had before you
13 signed the report?

14 A. Yes.

15 Q. Did you mark or annotate EXMC000006 in any way?

16 A. No. I have a clean copy.

17 Q. Is there any entry on EXMC000006 that you would
18 want explained by the author?

19 A. Not that I recall.

20 Q. Did counsel point you to EXMC000006 before your
21 report?

22 A. No. I reviewed the full production.

23 Q. Would your opinions change if EXMC000006 were
24 removed from the file?

25 A. I would have to consider the whole record, not

1 one page.

2 Q. Doctor, turning to EXMC000007, is there anything
3 on that page you disagree with?

4 A. No.

5 Q. Is EXMC000007 one of the pages you had before you
6 signed the report?

7 A. Yes.

8 Q. Did you mark or annotate EXMC000007 in any way?

9 A. No. I have a clean copy.

10 Q. Is there any entry on EXMC000007 that you would
11 want explained by the author?

12 A. Not that I recall.

13 Q. Did counsel point you to EXMC000007 before your
14 report?

15 A. No. I reviewed the full production.

16 Q. Would your opinions change if EXMC000007 were
17 removed from the file?

18 A. I would have to consider the whole record, not
19 one page.

20 Q. Doctor, turning to EXMC000008, is there anything
21 on that page you disagree with?

22 A. No.

23 Q. Is EXMC000008 one of the pages you had before you
24 signed the report?

25 A. Yes.

1 Q. Did you mark or annotate EXMC000008 in any way?

2 A. No. I have a clean copy.

3 Q. Is there any entry on EXMC000008 that you would
4 want explained by the author?

5 A. Not that I recall.

6 Q. Did counsel point you to EXMC000008 before your
7 report?

8 A. No. I reviewed the full production.

9 Q. Would your opinions change if EXMC000008 were
10 removed from the file?

11 A. I would have to consider the whole record, not
12 one page.

13 Q. Doctor, turning to EXMC000009, is there anything
14 on that page you disagree with?

15 A. No.

16 Q. Is EXMC000009 one of the pages you had before you
17 signed the report?

18 A. Yes.

19 Q. Did you mark or annotate EXMC000009 in any way?

20 A. No. I have a clean copy.

21 Q. Is there any entry on EXMC000009 that you would
22 want explained by the author?

23 A. Not that I recall.

24 Q. Did counsel point you to EXMC000009 before your
25 report?

1 A. No. I reviewed the full production.

2 Q. Would your opinions change if EXMC000009 were
3 removed from the file?

4 A. I would have to consider the whole record, not
5 one page.

6 Q. Doctor, turning to EXMC000010, is there anything
7 on that page you disagree with?

8 A. No.

9 Q. Is EXMC000010 one of the pages you had before you
10 signed the report?

11 A. Yes.

12 Q. Did you mark or annotate EXMC000010 in any way?

13 A. No. I have a clean copy.

14 Q. Is there any entry on EXMC000010 that you would
15 want explained by the author?

16 A. Not that I recall.

17 Q. Did counsel point you to EXMC000010 before your
18 report?

19 A. No. I reviewed the full production.

20 Q. Would your opinions change if EXMC000010 were
21 removed from the file?

22 A. I would have to consider the whole record, not
23 one page.

24 Q. Doctor, turning to EXMC000011, is there anything
25 on that page you disagree with?

1 A. No.

2 Q. Is EXMC000011 one of the pages you had before you
3 signed the report?

4 A. Yes.

5 Q. Did you mark or annotate EXMC000011 in any way?

6 A. No. I have a clean copy.

7 Q. Is there any entry on EXMC000011 that you would
8 want explained by the author?

9 A. Not that I recall.

10 Q. Did counsel point you to EXMC000011 before your
11 report?

12 A. No. I reviewed the full production.

13 Q. Would your opinions change if EXMC000011 were
14 removed from the file?

15 A. I would have to consider the whole record, not
16 one page.

17 Q. Doctor, turning to EXMC000012, is there anything
18 on that page you disagree with?

19 A. No.

20 Q. Is EXMC000012 one of the pages you had before you
21 signed the report?

22 A. Yes.

23 Q. Did you mark or annotate EXMC000012 in any way?

24 A. No. I have a clean copy.

25 Q. Is there any entry on EXMC000012 that you would

1 want explained by the author?

2 A. Not that I recall.

3 Q. Did counsel point you to EXMC000012 before your
4 report?

5 A. No. I reviewed the full production.

6 Q. Would your opinions change if EXMC000012 were
7 removed from the file?

8 A. I would have to consider the whole record, not
9 one page.

10 Q. Doctor, turning to EXMC000013, is there anything
11 on that page you disagree with?

12 A. No.

13 Q. Is EXMC000013 one of the pages you had before you
14 signed the report?

15 A. Yes.

16 Q. Did you mark or annotate EXMC000013 in any way?

17 A. No. I have a clean copy.

18 Q. Is there any entry on EXMC000013 that you would
19 want explained by the author?

20 A. Not that I recall.

21 Q. Did counsel point you to EXMC000013 before your
22 report?

23 A. No. I reviewed the full production.

24 Q. Would your opinions change if EXMC000013 were
25 removed from the file?

1 A. I would have to consider the whole record, not
2 one page.

3 Q. Doctor, turning to EXMC000014, is there anything
4 on that page you disagree with?

5 A. No.

6 Q. Is EXMC000014 one of the pages you had before you
7 signed the report?

8 A. Yes.

9 Q. Did you mark or annotate EXMC000014 in any way?

10 A. No. I have a clean copy.

11 Q. Is there any entry on EXMC000014 that you would
12 want explained by the author?

13 A. Not that I recall.

14 Q. Did counsel point you to EXMC000014 before your
15 report?

16 A. No. I reviewed the full production.

17 Q. Would your opinions change if EXMC000014 were
18 removed from the file?

19 A. I would have to consider the whole record, not
20 one page.

21 Q. Doctor, turning to EXMC000015, is there anything
22 on that page you disagree with?

23 A. No.

24 Q. Is EXMC000015 one of the pages you had before you
25 signed the report?

1 A. Yes.

2 Q. Did you mark or annotate EXMC000015 in any way?

3 A. No. I have a clean copy.

4 Q. Is there any entry on EXMC000015 that you would
5 want explained by the author?

6 A. Not that I recall.

7 Q. Did counsel point you to EXMC000015 before your
8 report?

9 A. No. I reviewed the full production.

10 Q. Would your opinions change if EXMC000015 were
11 removed from the file?

12 A. I would have to consider the whole record, not
13 one page.

14 Q. Doctor, turning to EXMC000016, is there anything
15 on that page you disagree with?

16 A. No.

17 Q. Is EXMC000016 one of the pages you had before you
18 signed the report?

19 A. Yes.

20 Q. Did you mark or annotate EXMC000016 in any way?

21 A. No. I have a clean copy.

22 Q. Is there any entry on EXMC000016 that you would
23 want explained by the author?

24 A. Not that I recall.

25 Q. Did counsel point you to EXMC000016 before your

1 report?

2 A. No. I reviewed the full production.

3 Q. Would your opinions change if EXMC000016 were
4 removed from the file?

5 A. I would have to consider the whole record, not
6 one page.

7 Q. Doctor, turning to EXMC000017, is there anything
8 on that page you disagree with?

9 A. No.

10 Q. Is EXMC000017 one of the pages you had before you
11 signed the report?

12 A. Yes.

13 Q. Did you mark or annotate EXMC000017 in any way?

14 A. No. I have a clean copy.

15 Q. Is there any entry on EXMC000017 that you would
16 want explained by the author?

17 A. Not that I recall.

18 Q. Did counsel point you to EXMC000017 before your
19 report?

20 A. No. I reviewed the full production.

21 Q. Would your opinions change if EXMC000017 were
22 removed from the file?

23 A. I would have to consider the whole record, not
24 one page.

25 Q. Doctor, turning to EXMC000018, is there anything

1 on that page you disagree with?

2 A. No.

3 Q. Is EXMC000018 one of the pages you had before you
4 signed the report?

5 A. Yes.

6 Q. Did you mark or annotate EXMC000018 in any way?

7 A. No. I have a clean copy.

8 Q. Is there any entry on EXMC000018 that you would
9 want explained by the author?

10 A. Not that I recall.

11 Q. Did counsel point you to EXMC000018 before your
12 report?

13 A. No. I reviewed the full production.

14 Q. Would your opinions change if EXMC000018 were
15 removed from the file?

16 A. I would have to consider the whole record, not
17 one page.

18 Q. Doctor, turning to EXMC000019, is there anything
19 on that page you disagree with?

20 A. No.

21 Q. Is EXMC000019 one of the pages you had before you
22 signed the report?

23 A. Yes.

24 Q. Did you mark or annotate EXMC000019 in any way?

25 A. No. I have a clean copy.

1 Q. Is there any entry on EXMC000019 that you would
2 want explained by the author?

3 A. Not that I recall.

4 Q. Did counsel point you to EXMC000019 before your
5 report?

6 A. No. I reviewed the full production.

7 Q. Would your opinions change if EXMC000019 were
8 removed from the file?

9 A. I would have to consider the whole record, not
10 one page.

11 Q. Doctor, turning to EXMC000020, is there anything
12 on that page you disagree with?

13 A. No.

14 Q. Is EXMC000020 one of the pages you had before you
15 signed the report?

16 A. Yes.

17 Q. Did you mark or annotate EXMC000020 in any way?

18 A. No. I have a clean copy.

19 Q. Is there any entry on EXMC000020 that you would
20 want explained by the author?

21 A. Not that I recall.

22 Q. Did counsel point you to EXMC000020 before your
23 report?

24 A. No. I reviewed the full production.

25 Q. Would your opinions change if EXMC000020 were

1 removed from the file?

2 A. I would have to consider the whole record, not
3 one page.

4 Q. Doctor, turning to EXMC000001, is there anything
5 on that page you disagree with?

6 A. No.

7 Q. Is EXMC000001 one of the pages you had before you
8 signed the report?

9 A. Yes.

10 Q. Did you mark or annotate EXMC000001 in any way?

11 A. No. I have a clean copy.

12 Q. Is there any entry on EXMC000001 that you would
13 want explained by the author?

14 A. Not that I recall.

15 Q. Did counsel point you to EXMC000001 before your
16 report?

17 A. No. I reviewed the full production.

18 Q. Would your opinions change if EXMC000001 were
19 removed from the file?

20 A. I would have to consider the whole record, not
21 one page.

22 Q. Doctor, turning to EXMC000002, is there anything
23 on that page you disagree with?

24 A. No.

25 Q. Is EXMC000002 one of the pages you had before you

1 signed the report?

2 A. Yes.

3 Q. Did you mark or annotate EXMC000002 in any way?

4 A. No. I have a clean copy.

5 Q. Is there any entry on EXMC000002 that you would
6 want explained by the author?

7 A. Not that I recall.

8 Q. Did counsel point you to EXMC000002 before your
9 report?

10 A. No. I reviewed the full production.

11 Q. Would your opinions change if EXMC000002 were
12 removed from the file?

13 A. I would have to consider the whole record, not
14 one page.

15 Q. Doctor, turning to EXMC000003, is there anything
16 on that page you disagree with?

17 A. No.

18 Q. Is EXMC000003 one of the pages you had before you
19 signed the report?

20 A. Yes.

21 Q. Did you mark or annotate EXMC000003 in any way?

22 A. No. I have a clean copy.

23 Q. Is there any entry on EXMC000003 that you would
24 want explained by the author?

25 A. Not that I recall.

1 Q. Did counsel point you to EXMC000003 before your
2 report?

3 A. No. I reviewed the full production.

4 Q. Would your opinions change if EXMC000003 were
5 removed from the file?

6 A. I would have to consider the whole record, not
7 one page.

8 Q. Doctor, turning to EXMC000004, is there anything
9 on that page you disagree with?

10 A. No.

11 Q. Is EXMC000004 one of the pages you had before you
12 signed the report?

13 A. Yes.

14 Q. Did you mark or annotate EXMC000004 in any way?

15 A. No. I have a clean copy.

16 Q. Is there any entry on EXMC000004 that you would
17 want explained by the author?

18 A. Not that I recall.

19 Q. Did counsel point you to EXMC000004 before your
20 report?

21 A. No. I reviewed the full production.

22 Q. Would your opinions change if EXMC000004 were
23 removed from the file?

24 A. I would have to consider the whole record, not
25 one page.

1 Q. Doctor, turning to EXMC000005, is there anything
2 on that page you disagree with?

3 A. No.

4 Q. Is EXMC000005 one of the pages you had before you
5 signed the report?

6 A. Yes.

7 Q. Did you mark or annotate EXMC000005 in any way?

8 A. No. I have a clean copy.

9 Q. Is there any entry on EXMC000005 that you would
10 want explained by the author?

11 A. Not that I recall.

12 Q. Did counsel point you to EXMC000005 before your
13 report?

14 A. No. I reviewed the full production.

15 Q. Would your opinions change if EXMC000005 were
16 removed from the file?

17 A. I would have to consider the whole record, not
18 one page.

19 Q. Doctor, turning to EXMC000006, is there anything
20 on that page you disagree with?

21 A. No.

22 Q. Is EXMC000006 one of the pages you had before you
23 signed the report?

24 A. Yes.

25 Q. Did you mark or annotate EXMC000006 in any way?

1 A. No. I have a clean copy.

2 Q. Is there any entry on EXMC000006 that you would
3 want explained by the author?

4 A. Not that I recall.

5 Q. Did counsel point you to EXMC000006 before your
6 report?

7 A. No. I reviewed the full production.

8 Q. Would your opinions change if EXMC000006 were
9 removed from the file?

10 A. I would have to consider the whole record, not
11 one page.

12 Q. Doctor, turning to EXMC000007, is there anything
13 on that page you disagree with?

14 A. No.

15 Q. Is EXMC000007 one of the pages you had before you
16 signed the report?

17 A. Yes.

18 Q. Did you mark or annotate EXMC000007 in any way?

19 A. No. I have a clean copy.

20 Q. Is there any entry on EXMC000007 that you would
21 want explained by the author?

22 A. Not that I recall.

23 Q. Did counsel point you to EXMC000007 before your
24 report?

25 A. No. I reviewed the full production.

1 Q. Would your opinions change if EXMC000007 were
2 removed from the file?

3 A. I would have to consider the whole record, not
4 one page.

5 Q. Doctor, turning to EXMC000008, is there anything
6 on that page you disagree with?

7 A. No.

8 Q. Is EXMC000008 one of the pages you had before you
9 signed the report?

10 A. Yes.

11 Q. Did you mark or annotate EXMC000008 in any way?

12 A. No. I have a clean copy.

13 Q. Is there any entry on EXMC000008 that you would
14 want explained by the author?

15 A. Not that I recall.

16 Q. Did counsel point you to EXMC000008 before your
17 report?

18 A. No. I reviewed the full production.

19 Q. Would your opinions change if EXMC000008 were
20 removed from the file?

21 A. I would have to consider the whole record, not
22 one page.

23 Q. Doctor, turning to EXMC000009, is there anything
24 on that page you disagree with?

25 A. No.

1 Q. Is EXMC000009 one of the pages you had before you
2 signed the report?

3 A. Yes.

4 Q. Did you mark or annotate EXMC000009 in any way?

5 A. No. I have a clean copy.

6 Q. Is there any entry on EXMC000009 that you would
7 want explained by the author?

8 A. Not that I recall.

9 Q. Did counsel point you to EXMC000009 before your
10 report?

11 A. No. I reviewed the full production.

12 Q. Would your opinions change if EXMC000009 were
13 removed from the file?

14 A. I would have to consider the whole record, not
15 one page.

16 Q. Doctor, turning to EXMC000010, is there anything
17 on that page you disagree with?

18 A. No.

19 Q. Is EXMC000010 one of the pages you had before you
20 signed the report?

21 A. Yes.

22 Q. Did you mark or annotate EXMC000010 in any way?

23 A. No. I have a clean copy.

24 Q. Is there any entry on EXMC000010 that you would
25 want explained by the author?

1 A. Not that I recall.

2 Q. Did counsel point you to EXMC000010 before your
3 report?

4 A. No. I reviewed the full production.

5 Q. Would your opinions change if EXMC000010 were
6 removed from the file?

7 A. I would have to consider the whole record, not
8 one page.

9 Q. Doctor, turning to EXMC000011, is there anything
10 on that page you disagree with?

11 A. No.

12 Q. Is EXMC000011 one of the pages you had before you
13 signed the report?

14 A. Yes.

15 Q. Did you mark or annotate EXMC000011 in any way?

16 A. No. I have a clean copy.

17 Q. Is there any entry on EXMC000011 that you would
18 want explained by the author?

19 A. Not that I recall.

20 Q. Did counsel point you to EXMC000011 before your
21 report?

22 A. No. I reviewed the full production.

23 Q. Would your opinions change if EXMC000011 were
24 removed from the file?

25 A. I would have to consider the whole record, not

1 one page.

2 Q. Doctor, turning to EXMC000012, is there anything
3 on that page you disagree with?

4 A. No.

5 Q. Is EXMC000012 one of the pages you had before you
6 signed the report?

7 A. Yes.

8 Q. Did you mark or annotate EXMC000012 in any way?

9 A. No. I have a clean copy.

10 Q. Is there any entry on EXMC000012 that you would
11 want explained by the author?

12 A. Not that I recall.

13 Q. Did counsel point you to EXMC000012 before your
14 report?

15 A. No. I reviewed the full production.

16 Q. Would your opinions change if EXMC000012 were
17 removed from the file?

18 A. I would have to consider the whole record, not
19 one page.

20 Q. Doctor, turning to EXMC000013, is there anything
21 on that page you disagree with?

22 A. No.

23 Q. Is EXMC000013 one of the pages you had before you
24 signed the report?

25 A. Yes.

1 Q. Did you mark or annotate EXMC000013 in any way?

2 A. No. I have a clean copy.

3 Q. Is there any entry on EXMC000013 that you would
4 want explained by the author?

5 A. Not that I recall.

6 Q. Did counsel point you to EXMC000013 before your
7 report?

8 A. No. I reviewed the full production.

9 Q. Would your opinions change if EXMC000013 were
10 removed from the file?

11 A. I would have to consider the whole record, not
12 one page.

13 Q. Doctor, turning to EXMC000014, is there anything
14 on that page you disagree with?

15 A. No.

16 Q. Is EXMC000014 one of the pages you had before you
17 signed the report?

18 A. Yes.

19 Q. Did you mark or annotate EXMC000014 in any way?

20 A. No. I have a clean copy.

21

22 MS. FICTIVE: I have no further questions.

23 MR. SAMPLE: No questions. The witness will read
24 and sign.

25 (The deposition concluded at 2:31 p.m.)

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CERTIFICATE OF WITNESS

I, A. Example, M.D., have read the foregoing
transcript of my deposition and, except for any
changes on the errata sheet, it is true and correct.

Date: _____

A. EXAMPLE, M.D.

REPORTER'S CERTIFICATE

I, Cora Stenwright, a certified shorthand reporter (SYNTHETIC), certify that the witness was duly sworn, that the testimony was taken down by me and transcribed under my direction, and that the transcript is a true record of the testimony.

Review and signature by the witness was requested before the deposition was completed.

Dated: September 2, 2026

/s/ Cora Stenwright, CSR No. SYN-0000

Example Court Reporting (SYNTHETIC)