

Deposition readiness binder (SYNTHETIC)

A. Example, M.D. | Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al.
Superior Court of Example County, No. EX-2025-CV-0417

Binder date: 2026-08-05. Deposition noticed by Fictive Ford LLP for 2026-08-12 at 9:00 a.m.: notice at [binder p.45](#).

Prepared by David A. Black Litigation Support Services from the report as served on 2026-06-30, the deposition notice, and the provider's earlier work on this matter: the case file register, the testimony list, the qualifications self-audit and the practice ledger.

Before the expert uses this binder

Retaining counsel may want to see this binder first. A binder the expert brings to a deposition should be presumed producible to the other side.

What the binder holds

Each section holds everything in its category from the sources named, in a fixed order that is the same for every expert. The binder contains no questions, no suggested answers, no coaching and no choice of what to emphasize. Blue text opens the page named; every page carries a Back to index link to this page. Section 1 uses three fixed status words: "cited page shows the statement", "cited page does not show it" and "no cite given".

Section	Opens at	Pages
1. The report, with each factual statement and the record page it cites	binder p.3	3 to 31
2. Materials-considered list and received log	binder p.32	32 to 33
3. Chronology of the record, from the bundled pages	binder p.34	34 to 34
4. CV, publication list and testimony list	binder p.35	35 to 43
5. Invoices and hours for this case	binder p.44	44 to 49
6. Prior public statements	binder p.50	50 to 52
7. Topic index	binder p.53	53 to 53
How the binder was built, and its limits	binder p.2	2

Section 1 in numbers

25 statements checked against 19 cited record pages: 19 "cited page shows the statement"; 2 "cited page does not show it"; 4 "no cite given". The companion workbook lists every row and every binder page.

How the binder was built, and its limits

Sources

The report as served (2026-06-30) and the deposition notice are what the expert sends. Everything else comes from the provider's earlier work on this matter, shown here as the SYNTHETIC samples for services 3 (case file register), 1 (testimony list), 2 (qualifications self-audit) and 5 (practice ledger). Each bundled page is reproduced whole from its source file, with a strip above it naming the source file and page.

Binder date

The binder is dated 2026-08-05, a week before the deposition. Every table leaves out entries dated after that date. The samples it draws on were built later in 2026, so a few bundled pages (the self-audit captures, the time log export) print later dates; the tables do not use those later entries.

Section 1 method

One row per sentence of the report that states a fact about the record (sections 4 to 7). A sentence with no cite of its own is "no cite given", with the nearest cite noted. A cite covers the sentence it closes; a sentence that lists separate findings is split into one row per finding, and a cite is applied to the finding its wording ties it to. A row reads "cited page shows the statement" when every fact in the sentence appears on the cited page or pages (read together where the sentence cites more than one), and "cited page does not show it" when any fact does not, with the fact named. Opinions and statements about the medical literature are not checked; only the record facts an opinion names are. Sections 1 to 3 of the report (retention, qualifications, materials) are covered by sections 2, 4 and 7 of the binder.

Tracing pages

Fetal heart rate tracing pages are read for their printed window and annotations, and for the plotted values measured against the page's printed scale. Where the report gives a tracing a category, the measured values are printed beside it. The provider does not assign tracing categories or interpret tracings.

Chronology

Built only from the record pages bundled in this binder, in date and time order, in the pages' own words where quoted. It is not a chronology of the full 3,200-page record.

Topic index

The five topics and their search terms are fixed and the same for every expert. For each topic, the index lists the report pages that use a search term and the binder sections that hold related documents. It points; it does not select.

Prior public statements

The entries are those on the public-record tab of the qualifications self-audit, quoted as the mock sources print them. They are entries naming the expert, not statements by the expert on this case's topics; no other search was run for the binder.

Invoices and hours

Time entries for this matter dated on or before 2026-08-05, as the expert recorded them, at the rate in the signed retention terms. The practice ledger sample begins 2026-07-01; time and invoices before that date are outside it.

The line

The provider assembles, lists and quotes. The provider gives no view on the report's opinions, the strength of any support, what the expert should say, or what to emphasize, and does not contact any party. Retaining counsel decides whether and how the binder is used.

1. The report, with each factual statement and the record page it cites

The report as served is bundled at [binder p.6](#) (7 pages); the cited record pages follow it in date order from [binder p.13](#).
19 rows: cited page shows the statement. 2 rows: cited page does not show it. 4 rows: no cite given.

No.	Report	Statement, as the report words it	Cited page	Status	What the cited page shows, and notes
C01	Report page 2 binder p.7	"Ms. Doe received prenatal care at Example Obstetric Group."	none	no cite given	The sentence carries no cite. The next sentence cites EOG000120, an Example Obstetric Group prenatal visit page.
C02	Report page 2 binder p.7	"At her visit on 2025-03-10 at 38w3d, her blood pressure was 118/74 and GBS screening was negative (EOG000120)."	EOG000120, binder p.13	cited page shows the statement	"Date: 2025-03-10. Gestational age 38w3d." "BP 118/74." "GBS negative (collected 2025-02-17)."
C03	Report page 2 binder p.7	"She was evaluated in obstetric triage on 2025-03-13 and discharged home after 40 minutes of fetal monitoring described as reassuring (DOE000180)."	DOE000180, binder p.14	cited page does not show it	"Date of service: 2025-03-13" "External fetal monitoring applied 21:42 for 40 minutes. Baseline 135, moderate variability, accelerations present." "discharged home in stable condition" The page shows the triage date, 40 minutes of monitoring and discharge home. The word "reassuring" does not appear on the page; the page records the monitoring as quoted.
C04	Report page 2 binder p.7	"She was admitted in active labor at 08:10 on 2025-03-14 at 39w0d with a Category I tracing (DOE000301)."	DOE000301, binder p.17	cited page shows the statement	"Date of service: 2025-03-14 Time: 08:10" "39w0d, admitted in active labor" "Category I."
C05	Report page 2 binder p.7	"The tracing at admission shows a baseline near 140 with moderate variability (EMC000007)."	EMC000007, binder p.16	cited page shows the statement	"Window 2025-03-14 08:09 to 08:13" Tracing page; it prints no words for baseline or variability. Measured against the page's printed scale: plotted FHR 132 to 148 bpm, median 141. The window includes the 08:10 admission time. "Moderate" is the report's reading of the graphic; the provider does not assign tracing categories.
C06	Report page 2 binder p.7	"By 00:40 on 2025-03-15 the nurse recorded recurrent late decelerations with minimal variability and called the obstetrician (DOETR000062)."	DOETR000062, binder p.19	cited page shows the statement	"first call Dr. Template to the bedside on March 15?" "I called at 00:40. That is in my note." "Recurrent late decelerations with minimal variability." The cited page is deposition testimony of R. Specimen, R.N., transcript page 62, lines 1 to 4.
C07	Report page 2 binder p.7	"The tracing in that period shows a baseline near 150 with decelerations following contractions (EMC000254)."	EMC000254, binder p.18	cited page shows the statement	"Window 2025-03-15 00:37 to 00:41" Tracing page. Measured against the page's printed scale: FHR median 149 bpm; low point 123 bpm about 20 seconds after a contraction peak; low point 125 bpm about 20 seconds after a contraction peak. The page prints no words for baseline or deceleration type.
C08	Report page 2 binder p.7	"A prolonged deceleration began at 02:18 and did not recover (EMC000279)."	EMC000279, binder p.21	cited page does not show it	"02:18 prolonged deceleration begins" "Window 2025-03-15 02:17 to 02:21" The page shows the deceleration beginning at 02:18 and FHR 77 to 83 bpm to the end of its window (02:21). Whether it recovered later is not on this page. EMC000286 (window 02:45 to 02:49) is annotated "prolonged deceleration continues"; DOE000356, cited in the next sentence, reads "without recovery".

No.	Report	Statement, as the report words it	Cited page	Status	What the cited page shows, and notes
C09	Report page 2 binder p.7	"The decision for cesarean was made at 02:24, and Baby D. was born at 02:47 (DOE000356; DOETR000210)."	DOE000356, binder p.22 DOETR000210, binder p.20	cited page shows the statement	"Time of birth: 02:47" "Decision for cesarean 02:24." "At 02:24, after the deceleration that began at 02:18 did not recover." Read together. DOE000356 shows both times. DOETR000210 (testimony of B. Template, M.D., transcript page 46) shows the 02:24 decision and a 02:41 incision, not the birth time.
C10	Report page 3 binder p.8	"Apgar scores were 1, 3 and 5 at 1, 5 and 10 minutes."	none	no cite given	The sentence carries no cite. The next sentence cites DOE000413, which prints "Apgar scores: 1 at 1 minute, 3 at 5 minutes, 5 at 10 minutes."
C11	Report page 3 binder p.8	"Baby D. required positive pressure ventilation and intubation at 4 minutes, and the admission examination recorded moderate encephalopathy (DOE000413)."	DOE000413, binder p.25	cited page shows the statement	"positive pressure ventilation from 30 seconds; intubated at 4 minutes" "Modified Sarnat: moderate."
C12	Report page 3 binder p.8	"Umbilical arterial pH was 6.94 with a base deficit of 16 mmol/L (DOE000420)."	DOE000420, binder p.24	cited page shows the statement	"Umbilical arterial: pH 6.94" "Base deficit 16 mmol/L"
C13	Report page 3 binder p.8	"Therapeutic hypothermia began at 04:40, at 1 hour 53 minutes of age (DOE000455)."	DOE000455, binder p.26	cited page shows the statement	"Cooling initiated: 2025-03-15 04:40 (1 hour 53 minutes of age)."
C14	Report page 3 binder p.8	"Electrographic seizures were first recorded at 9 hours of age (DOE000471)"	DOE000471, binder p.27	cited page shows the statement	"electrographic seizures first noted at 11:48 (9 hours of age)."
C15	Report page 3 binder p.8	"and continuous EEG recorded seizures on day 1 only (DOE001650)."	DOE001650, binder p.29	cited page shows the statement	"continuous video EEG during hypothermia." "Electrographic seizures: 6 events on day 1, none after 2025-03-16 06:00."
C16	Report page 3 binder p.8	"Placental pathology showed focal villous edema without acute chorioamnionitis (EMC000545)."	EMC000545, binder p.28	cited page shows the statement	"Microscopic: focal villous edema. No acute chorioamnionitis."
C17	Report page 3 binder p.8	"MRI on day of life 5 showed restricted diffusion in the ventrolateral thalami and posterior putamina (DOE001641)."	DOE001641, binder p.30	cited page shows the statement	"Date of exam: 2025-03-20 (day of life 5)." "restricted diffusion in the bilateral ventrolateral thalami and posterior putamina."
C18	Report page 3 binder p.8	"At 12 months, Baby D. had increased tone in all four extremities and motor delay (DOE001295)."	DOE001295, binder p.31	cited page shows the statement	"Date: 2026-03-18. Age 12 months." "increased tone in all four extremities" "motor delay"
C19	Report page 4 binder p.9	"The basis is the Apgar scores, the need for intubation, the admission examination and the early seizures (DOE000413; DOE000471)."	DOE000413, binder p.25 DOE000471, binder p.27	cited page shows the statement	"Apgar scores: 1 at 1 minute" "intubated at 4 minutes" "Modified Sarnat: moderate." "electrographic seizures first noted at 11:48" Opinion 1. Read together. Only the record facts the sentence names are checked; the opinion is not.
C20	Report page 4 binder p.9	"The pattern of injury on MRI, involving the basal ganglia and thalami, is the pattern described in the medical literature"	DOE001641, binder p.30	cited page shows the statement	"Impression: pattern involving the basal ganglia and thalami" Opinion 2. The record fact (MRI pattern) is checked. The statement about the medical literature is not a statement about a record page and is not checked here.
C21	Report page 4 binder p.9	"The cord gas values, the prolonged deceleration beginning at 02:18 and the absence of placental inflammation are consistent with"	DOE000420, binder p.24 EMC000279, binder p.21 EMC000545, binder p.28	cited page shows the statement	"Umbilical arterial: pH 6.94" "02:18 prolonged deceleration begins" "No acute chorioamnionitis. No funisitis." Opinion 3. Read together, one fact per page. The opinion on timing is not checked.
C22	Report page 5 binder p.10	"The records I reviewed do not show maternal fever, placental inflammation or abnormal findings on the 2025-03-13 triage monitoring as it is described in the triage note (DOE000180)." Part checked in this row: maternal fever	none	no cite given	The sentence's one cite is tied by its wording to the triage note (row C24). Absence of a finding across the whole record is not checked; this check covers cited pages.

No.	Report	Statement, as the report words it	Cited page	Status	What the cited page shows, and notes
C23	Report page 5 binder p.10	"The records I reviewed do not show maternal fever, placental inflammation or abnormal findings on the 2025-03-13 triage monitoring as it is described in the triage note (DOE000180)." Part checked in this row: placental inflammation	none	no cite given	Same sentence; no cite for this part. EMC000545, cited on report pages 3 and 4, prints "No acute chorioamnionitis. No funisitis."
C24	Report page 5 binder p.10	"The records I reviewed do not show maternal fever, placental inflammation or abnormal findings on the 2025-03-13 triage monitoring as it is described in the triage note (DOE000180)." Part checked in this row: abnormal findings on the 2025-03-13 triage monitoring as described in the triage note	DOE000180, binder p.14	cited page shows the statement	"Baseline 135, moderate variability, accelerations present." The note records the findings quoted and no finding labeled abnormal.
C25	Report page 5 binder p.10	"a timeline of the fetal heart rate tracing from 00:00 to 02:47 on 2025-03-15, prepared from EMC000001 to EMC000286"	EMC000001, binder p.15 EMC000286, binder p.23	cited page shows the statement	"Window 2025-03-14 07:45 to 07:49" "Window 2025-03-15 02:45 to 02:49" Exhibit description; a range cite. EMC000001 opens at 2025-03-14 07:45; EMC000286 is the window 2025-03-15 02:45 to 02:49. The 286 pages run in unbroken 4-minute sequence, so the range covers 00:00 to 02:47 on 2025-03-15.

Shaded rows are the rows whose status is not "cited page shows the statement". Shading marks status only.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

EXPERT REPORT OF A. EXAMPLE, M.D. (SYNTHETIC)

Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al. Superior Court of Example County (SYNTHETIC), No. EX-2025-CV-0417. Served 2026-06-30.

1. Retention and assignment

I was retained by Sample & Sample LLP, counsel for plaintiff, to review the records of Jane Doe and Baby D. and to state my opinions on the nature and timing of Baby D.'s neonatal brain injury. This report states my opinions and the bases for them.

2. Qualifications

I am a physician board certified in pediatrics and in neonatal-perinatal medicine (SYNTHETIC). I practice with Example Neonatal Associates, 100 Sample Way, Example City. I have cared for newborns with neonatal encephalopathy, including infants treated with therapeutic hypothermia, for more than fifteen years. My curriculum vitae is attached as Appendix A, and a list of all publications I authored in the previous 10 years appears in Appendix A, part 2.

3. Facts and data considered

I reviewed the materials listed in Appendix C, which identifies each item by producing party and Bates range. I have been told that the materials were produced in this action and I have assumed that they are authentic copies.

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4. Summary of pertinent facts

Ms. Doe received prenatal care at Example Obstetric Group. At her visit on 2025-03-10 at 38w3d, her blood pressure was 118/74 and GBS screening was negative (EOG000120).

She was evaluated in obstetric triage on 2025-03-13 and discharged home after 40 minutes of fetal monitoring described as reassuring (DOE000180).

She was admitted in active labor at 08:10 on 2025-03-14 at 39w0d with a Category I tracing (DOE000301). The tracing at admission shows a baseline near 140 with moderate variability (EMC000007).

By 00:40 on 2025-03-15 the nurse recorded recurrent late decelerations with minimal variability and called the obstetrician (DOETR000062). The tracing in that period shows a baseline near 150 with decelerations following contractions (EMC000254).

A prolonged deceleration began at 02:18 and did not recover (EMC000279). The decision for cesarean was made at 02:24, and Baby D. was born at 02:47 (DOE000356; DOETR000210).

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Apgar scores were 1, 3 and 5 at 1, 5 and 10 minutes. Baby D. required positive pressure ventilation and intubation at 4 minutes, and the admission examination recorded moderate encephalopathy (DOE000413).

Umbilical arterial pH was 6.94 with a base deficit of 16 mmol/L (DOE000420).

Therapeutic hypothermia began at 04:40, at 1 hour 53 minutes of age (DOE000455). Electrographic seizures were first recorded at 9 hours of age (DOE000471), and continuous EEG recorded seizures on day 1 only (DOE001650).

Placental pathology showed focal villous edema without acute chorioamnionitis (EMC000545).

MRI on day of life 5 showed restricted diffusion in the ventrolateral thalami and posterior putamina (DOE001641). At 12 months, Baby D. had increased tone in all four extremities and motor delay (DOE001295).

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

5. Opinions

Opinion 1. Baby D. had neonatal encephalopathy of moderate severity at birth. The basis is the Apgar scores, the need for intubation, the admission examination and the early seizures (DOE000413; DOE000471).

Opinion 2. The pattern of injury on MRI, involving the basal ganglia and thalami, is the pattern described in the medical literature after an acute, severe interruption of blood flow and oxygen near the time of birth (DOE001641).

Opinion 3. The cord gas values, the prolonged deceleration beginning at 02:18 and the absence of placental inflammation are consistent with an injury that occurred in the hours before delivery rather than earlier in pregnancy (DOE000420; EMC000279; EMC000545).

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

6. Bases and reasons

My opinions rest on the records identified above, on my training and experience, and on the published literature I rely on in practice. I considered alternative explanations, including infection, placental disease and a chronic process before labor. The records I reviewed do not show maternal fever, placental inflammation or abnormal findings on the 2025-03-13 triage monitoring as it is described in the triage note (DOE000180).

I reserve the right to supplement these opinions if additional materials are provided, including any deposition testimony not yet available to me.

7. Exhibits

I may use the following exhibits to summarize or support my opinions: a timeline of the fetal heart rate tracing from 00:00 to 02:47 on 2025-03-15, prepared from EMC000001 to EMC000286, and enlargements of the MRI report and cord gas result.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Appendix A, part 1. Curriculum vitae (summary, SYNTHETIC)

Education: M.D., Example State School of Medicine. Residency in pediatrics and fellowship in neonatal-perinatal medicine, Sample Children's Hospital. Board certification: pediatrics; neonatal-perinatal medicine (SYNTHETIC).

Appendix A, part 2. Publications authored in the previous 10 years (SYNTHETIC)

1. Example A, Sample B. Timing of cooling in outborn neonates. Synthetic Journal of Neonatology. 2019;4:12 to 19.
2. Example A. Seizure burden during therapeutic hypothermia. Synthetic Pediatric Reports. 2021;9:101 to 108.
3. Placeholder C, Example A. Cord gas sampling practice in community hospitals. Synthetic Perinatal Review. 2024;2:55 to 61.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Appendix B. Cases in which I testified at trial or by deposition in the previous 4 years (SYNTHETIC)

A.C. v. Riverbend Regional Medical Center, No. SYN-2026-000123, Circuit Court of Sample County (SYNTHETIC): deposition, 2026-04-08.

Roe v. Sample Children's Hospital, No. SC-2024-L-0033, Circuit Court of Sample County (SYNTHETIC): deposition, 2025-01-22; trial, 2025-10-06.

Poe v. Hypothetical Health System, No. EXD-1:25-cv-00907-SYN, United States District Court for the District of Example (SYNTHETIC): deposition, 2025-11-13.

Appendix C. Materials considered

Example Medical Center maternal and NICU records, DOE000001 to DOE001190. Fetal heart rate tracing, EMC000001 to EMC000286. Policies, EMC000287 to EMC000401. Example Obstetric Group records, EOG000001 to EOG000188. Sample Children's Hospital records, DOE001191 to DOE001612. Imaging and EEG reports, DOE001613 to DOE001702. EHR audit trail, EMC000402 to EMC000530. Pathology and laboratory, EMC000531 to EMC000610. NICU flowsheets, EMC000580 to EMC000759. Early intervention records, DOE001703 to DOE001790. Depositions of R. Specimen, R.N. and B. Template, M.D., DOETR000001 to DOETR000372.

I declare that this report states my opinions and the bases for them. Signed 2026-06-30. /s/ A. Example (SYNTHETIC) A. Example, M.D.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Obstetric Group | Prenatal Visit

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date: 2025-03-10. Gestational age 38w3d.

BP 118/74. Fundal height 38 cm. Fetal heart tones 140s. Vertex by Leopold maneuvers.

GBS negative (collected 2025-02-17). Reviewed labor precautions.

Signed: Obstetrician (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Obstetric Triage Note

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date of service: 2025-03-13 Arrival 21:30 Departure 23:10

Chief complaint: contractions every 6 to 8 minutes since 18:00. Gestational age 38w6d by EDD 2025-03-21.

Cervix 2 cm / 60% / -2 on arrival; unchanged at 22:50 recheck. Membranes intact.

External fetal monitoring applied 21:42 for 40 minutes. Baseline 135, moderate variability, accelerations present.

EFM tracing archived to the fetal monitoring system per unit practice. Tracing not printed to chart.

Disposition: discharged home in stable condition with labor precautions. Return if contractions every 5 minutes.

Signed: Triage R.N. (SYNTHETIC) 23:14

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-14 07:45 to 07:49



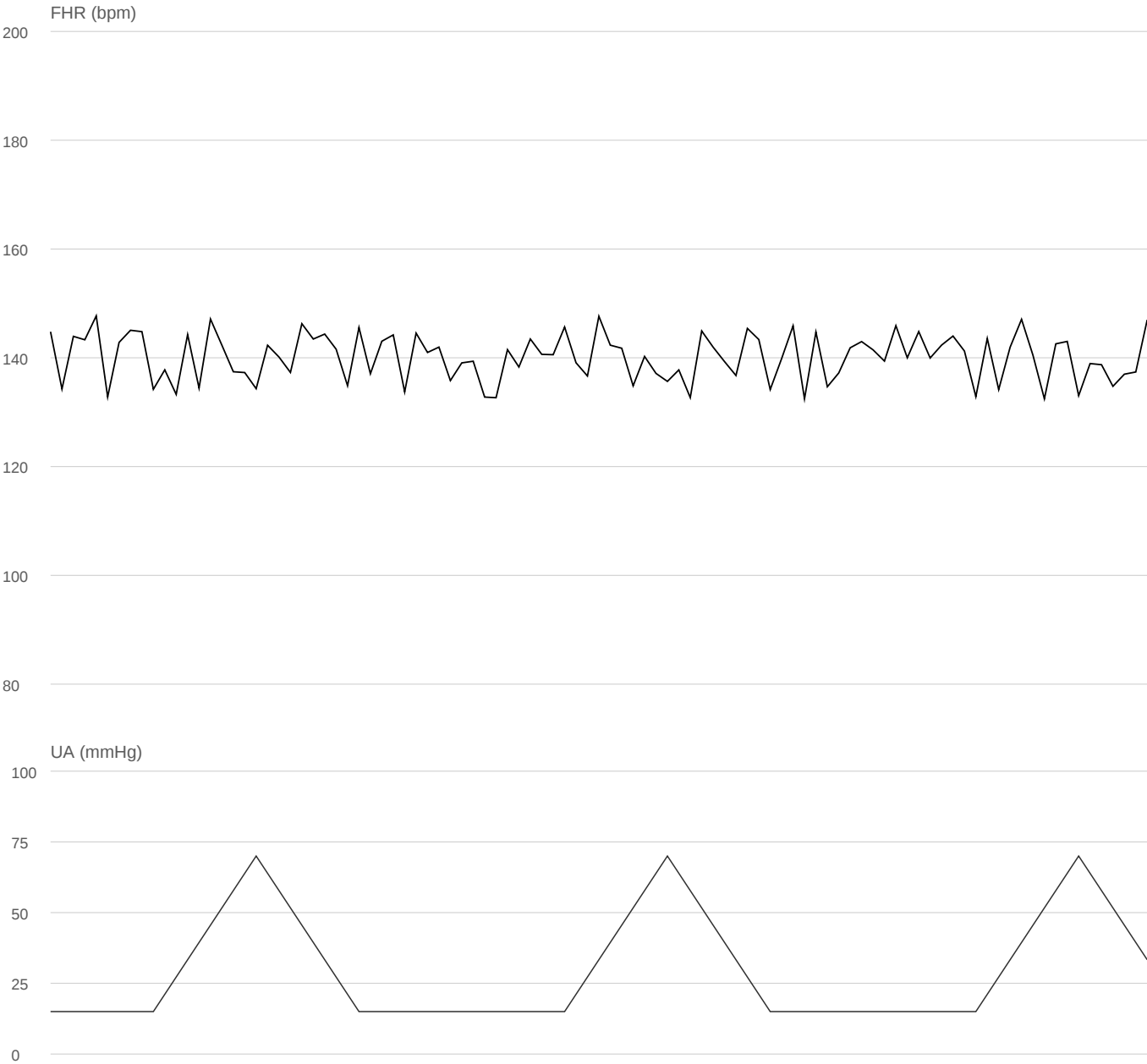
Annotations: 07:45 provider notified

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-14 08:09 to 08:13



Annotations: 08:09 position change

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Labor and Delivery Admission Note

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date of service: 2025-03-14 Time: 08:10

G2P1, 39w0d, admitted in active labor. Contractions every 3 to 4 minutes since 04:00.

Cervix 4 cm / 80% / -1. Membranes intact. Vertex by bedside ultrasound.

Prenatal course reviewed from Example Obstetric Group records: GBS negative, glucose screen normal.

EFM: baseline 140, moderate variability, accelerations present, no decelerations. Category I.

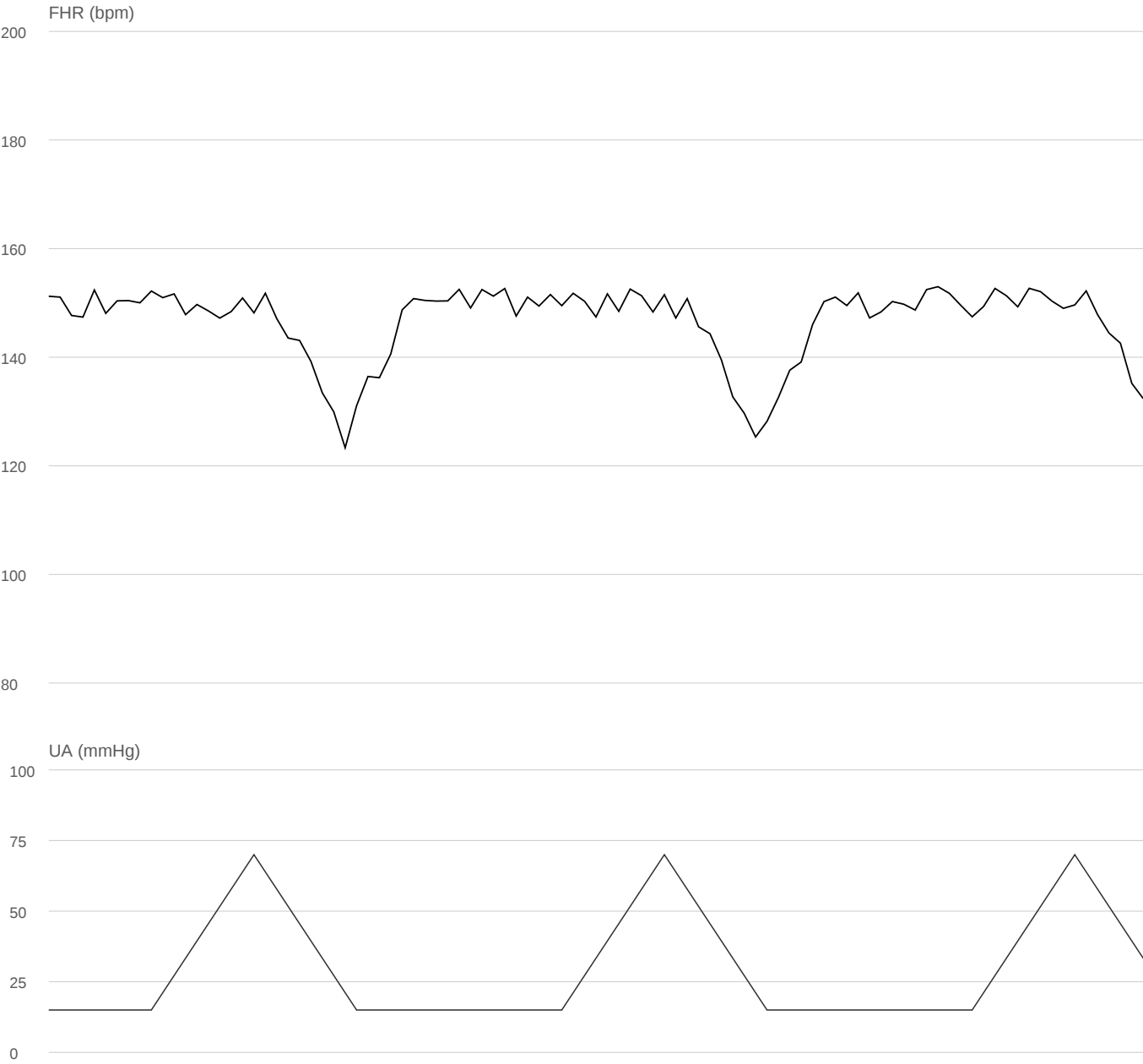
Plan: admit to labor and delivery, continuous EFM, epidural on request.

Signed: B. Template, M.D. (SYNTHETIC) 08:22

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-15 00:37 to 00:41



Annotations: 00:37 IV bolus

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Deposition of R. Specimen, R.N., taken 2026-05-06 (SYNTHETIC transcript)

Page 62

1 Q. At what time did you first call Dr. Template to the bedside on March 15?

2 A. I called at 00:40. That is in my note.

3 Q. And what did the monitor show at that time?

4 A. Recurrent late decelerations with minimal variability.

5 Q. Did Dr. Template come to the bedside?

6 A. He came at about 01:15.

7 Q. Between 00:40 and 01:15, what did you do?

8 A. I turned her to her left side, gave a fluid bolus and turned off the
9 oxytocin.

10 Q. Is that documented?

11 A. Yes, in my nursing notes and the flowsheet.

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SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Deposition of B. Template, M.D., taken 2026-05-21 (SYNTHETIC transcript)

Page 46

1 Q. Doctor, when you arrived at 01:15, what did you see on the tracing?

2 A. Minimal variability and recurrent late decelerations.

3 Q. What was your plan at that time?

4 A. Continue resuscitative measures and reassess. She was 8 centimeters.

5 Q. When did you decide on a cesarean?

6 A. At 02:24, after the deceleration that began at 02:18 did not recover.

7 Q. What was the decision-to-incision interval?

8 A. Seventeen minutes. Incision was at 02:41.

9 Q. Were you aware of the tracing from the triage visit on March 13?

10 A. I did not look at it that night.

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SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-15 02:17 to 02:21



Annotations: 02:18 prolonged deceleration begins; 02:24 decision for cesarean

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Delivery Note

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date of service: 2025-03-15 Time of birth: 02:47

Indication: prolonged deceleration beginning 02:18 without recovery. Decision for cesarean 02:24.

Procedure: primary low transverse cesarean under epidural extension. Skin incision 02:41.

Findings: live female infant, vertex, loose nuchal cord x1. Clear amniotic fluid.

Infant handed to the neonatal resuscitation team. Apgars assigned by the neonatal team.

Placenta sent to pathology. Cord arterial and venous gases sent.

Signed: B. Template, M.D. (SYNTHETIC) 03:30

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-15 02:45 to 02:49



Annotations: 02:45 prolonged deceleration continues

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center Laboratory | Cord Blood Gas

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Collected: 2025-03-15 02:49 Resulted: 2025-03-15 03:02

Umbilical arterial: pH 6.94 pCO2 88 mmHg pO2 11 mmHg Base deficit 16 mmol/L

Umbilical venous: pH 7.06 pCO2 62 mmHg pO2 19 mmHg Base deficit 12 mmol/L

Specimens paired and labeled by delivery room R.N.

Reference: arterial pH 7.18 to 7.38 (laboratory reference range, SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center NICU | Admission History and Physical

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Admission: 2025-03-15 03:05. Birth weight 3,310 g. Gestational age 39w1d.

Delivery: emergency cesarean at 02:47 for prolonged fetal bradycardia.

Apgar scores: 1 at 1 minute, 3 at 5 minutes, 5 at 10 minutes.

Resuscitation: positive pressure ventilation from 30 seconds; intubated at 4 minutes; no chest compressions.

Exam at 45 minutes of age: lethargic, hypotonic, weak suck, incomplete Moro. Modified Sarnat: moderate.

Plan: evaluate for therapeutic hypothermia; cord gases pending; aEEG on admission.

Signed: NICU attending (SYNTHETIC) 03:40

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center NICU | Therapeutic Hypothermia Flowsheet

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Cooling initiated: 2025-03-15 04:40 (1 hour 53 minutes of age). Servo-controlled whole body cooling.
Target esophageal temperature 33.5 C reached at 05:25.
Planned duration 72 hours. Rewarming to begin 2025-03-18 04:40 at 0.5 C per hour.
04:40 T 36.1 05:00 T 34.6 05:25 T 33.5 06:00 T 33.4 07:00 T 33.5 08:00 T 33.6
Signed: NICU R.N. (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center NICU | Progress Note, Day of Life 0

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2025-03-15 12:10

aEEG: discontinuous background; electrographic seizures first noted at 11:48 (9 hours of age).

Phenobarbital 20 mg/kg load given 12:05.

Remains on hypothermia protocol, esophageal temperature 33.5 C.

Signed: NICU attending (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Medical Center Pathology | Placental Pathology Report

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Received: 2025-03-15. Reported: 2025-03-19.

Gross: singleton placenta, trimmed weight 460 g. Three-vessel cord, 54 cm, central insertion.

Microscopic: focal villous edema. No acute chorioamnionitis. No funisitis. No infarcts identified.

Diagnosis: third trimester placenta with focal villous edema (SYNTHETIC report).

Signed: Pathologist (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Sample Children's Hospital | EEG Report

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2025-03-16 to 2025-03-18, continuous video EEG during hypothermia.

Background: discontinuous with interburst intervals up to 10 seconds on day 1, improving to continuous by day 3.

Electrographic seizures: 6 events on day 1, none after 2025-03-16 06:00.

Signed: Pediatric neurophysiologist (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Sample Children's Hospital Radiology | MRI Brain Without Contrast

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date of exam: 2025-03-20 (day of life 5). Performed at Example Medical Center, read by outside radiologist.

Findings: restricted diffusion in the bilateral ventrolateral thalami and posterior putamina.

Posterior limb of the internal capsule signal abnormal bilaterally. No hemorrhage. No mass effect.

Impression: pattern involving the basal ganglia and thalami (SYNTHETIC report).

Images available on PACS. Copy of images provided to family on CD at discharge.

Signed: Radiologist (SYNTHETIC)

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Sample Children's Hospital | Neurology Clinic Note

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2026-03-18. Age 12 months.

History: neonatal encephalopathy, treated with therapeutic hypothermia 2025-03-15 to 2025-03-18.

Exam: increased tone in all four extremities, left greater than right. Not yet sitting without support.

Assessment: motor delay with increased tone, followed by physical therapy through early intervention.

Signed: Pediatric neurologist (SYNTHETIC)

2. Materials-considered list and received log

Materials-considered list, as generated from the expert’s marks in the case file register (service 3). The expert adopts or edits the list; it is shown as generated. Items are grouped by category and identified by producing party and Bates range.

Item	Category	Description	Bates range	Pages	Relied upon	Pages of this item in the binder
1	Medical records: maternal	Example Medical Center maternal records: prenatal clinic, triage, labor and delivery, postpartum	DOE000001 to DOE000412	412	Yes	DOE000180, binder p.14 DOE000301, binder p.17 DOE000356, binder p.22
5	Medical records: maternal	Example Obstetric Group prenatal office records of Jane Doe	EOG000001 to EOG000188	188	Yes	EOG000120, binder p.13
2	Medical records: neonatal	Example Medical Center NICU records of Baby D.	DOE000413 to DOE001190	778	Yes	DOE000420, binder p.24 DOE000413, binder p.25 DOE000455, binder p.26 DOE000471, binder p.27
6	Medical records: neonatal	Sample Children’s Hospital outpatient neurology and developmental clinic records of Baby D.	DOE001191 to DOE001612	422	Yes	DOE001295, binder p.31
10	Medical records: neonatal	Supplemental production: NICU nursing flowsheets	EMC000580 to EMC000759	180	No	none
11	Medical records: neonatal	Example County Early Intervention and therapy records of Baby D.	DOE001703 to DOE001790	88	No	none
3	Fetal monitoring	Fetal heart rate and uterine activity tracing, 2025-03-14 to 2025-03-15	EMC000001 to EMC000286	286	Yes	EMC000001, binder p.15 EMC000007, binder p.16 EMC000254, binder p.18 EMC000279, binder p.21 EMC000286, binder p.23
4	Policies and procedures	Labor and delivery and NICU policies and procedures, with index	EMC000287 to EMC000401	115	No	none
7	Imaging and EEG	Imaging and EEG reports of Baby D. (reports only)	DOE001613 to DOE001702	90	Yes	DOE001650, binder p.29 DOE001641, binder p.30
8	Audit trail	EHR audit trail, labor and delivery encounter	EMC000402 to EMC000530	129	No	none
9	Pathology and laboratory	Placental pathology report and laboratory results	EMC000531 to EMC000610	80	Yes	EMC000545, binder p.28
12	Deposition transcripts	Deposition of R. Specimen, R.N., taken 2026-05-06, with exhibits	DOETR000001 to DOETR000164	164	Yes	DOETR000062, binder p.19
13	Deposition transcripts	Deposition of B. Template, M.D., taken 2026-05-21, with exhibits	DOETR000165 to DOETR000372	208	Yes	DOETR000210, binder p.20

Totals: 13 items, 3,140 pages. Item 14 (interrogatory responses) was received and is not marked considered, so it is in the received log below and not in this list.

Received log

One row per production as received, from the case file register. Every production was received before the binder date. The SHA-256 column shows the first 12 characters; the register holds the full value.

Item	Received	From	Description as labeled	Bates range	Pages	Over-laps item	Designation	SHA-256 (first 12)
1	2026-02-24	Sample & Sample LLP	Example Medical Center maternal records: prenatal clinic, triage, labor and delivery, postpartum	DOE000001 to DOE000412	412	none	CONFIDENTIAL	f5f2a7daed81
2	2026-02-24	Sample & Sample LLP	Example Medical Center NICU records of Baby D.	DOE000413 to DOE001190	778	none	CONFIDENTIAL	8f7f03c15767

Item	Received	From	Description as labeled	Bates range	Pages	Over-laps item	Designation	SHA-256 (first 12)
3	2026-03-06	Sample & Sample LLP	Fetal heart rate and uterine activity tracing, 2025-03-14 to 2025-03-15	EMC000001 to EMC000286	286	none	CONFIDENTIAL	6bde4236b258
4	2026-03-06	Sample & Sample LLP	Labor and delivery and NICU policies and procedures, with index	EMC000287 to EMC000401	115	none	CONFIDENTIAL	0e6a4b5d347a
5	2026-03-20	Sample & Sample LLP	Example Obstetric Group prenatal office records of Jane Doe	EOG000001 to EOG000188	188	none	CONFIDENTIAL	3af405cb41ac
6	2026-03-27	Sample & Sample LLP	Sample Children's Hospital outpatient neurology and developmental clinic records of Baby D.	DOE001191 to DOE001612	422	none	CONFIDENTIAL	0de53e7686db
7	2026-04-03	Sample & Sample LLP	Imaging and EEG reports of Baby D. (reports only)	DOE001613 to DOE001702	90	none	CONFIDENTIAL	fcad0469e631
8	2026-04-10	Sample & Sample LLP	EHR audit trail, labor and delivery encounter	EMC000402 to EMC000530	129	none	CONFIDENTIAL	36cefda74400
9	2026-04-17	Sample & Sample LLP	Placental pathology report and laboratory results	EMC000531 to EMC000610	80	10	CONFIDENTIAL	9f43e5a84bd6
10	2026-05-01	Sample & Sample LLP	Supplemental production: NICU nursing flowsheets	EMC000580 to EMC000759	180	9	CONFIDENTIAL	44afcba66a3b
11	2026-05-15	Sample & Sample LLP	Example County Early Intervention and therapy records of Baby D.	DOE001703 to DOE001790	88	none	CONFIDENTIAL	32dadf1d45ed
12	2026-05-29	Sample & Sample LLP	Deposition of R. Specimen, R.N., taken 2026-05-06, with exhibits	DOETR000001 to DOETR000164	164	none	CONFIDENTIAL	52fa932ed01e
13	2026-06-05	Sample & Sample LLP	Deposition of B. Template, M.D., taken 2026-05-21, with exhibits	DOETR000165 to DOETR000372	208	none	CONFIDENTIAL	ed10c06ea3c5
14	2026-06-12	Sample & Sample LLP	Example Medical Center supplemental responses to interrogatories, set two	EMC000760 to EMC000819	60	none	None stamped	1c1612e64b71

Total pages received: 3,200. The case file register's other tabs (referenced but not received, Rule 26 elements, protective order) are not reproduced in the binder.

3. Chronology of the record, from the bundled pages

Built only from the 19 record pages bundled in section 1, in date and time order. Quoted words are the page's own. Each entry opens its page.

Date	Time	Entry	Page
2025-03-10	not stated	Prenatal visit, Example Obstetric Group, 38w3d. "BP 118/74." "GBS negative (collected 2025-02-17)."	EOG000120, binder p.13
2025-03-13	21:30 to 23:10	Obstetric triage. "External fetal monitoring applied 21:42 for 40 minutes. Baseline 135, moderate variability, accelerations present." Discharged home with labor precautions.	DOE000180, binder p.14
2025-03-14	07:45	Fetal monitoring archive printout begins (first window 07:45 to 07:49; one page per four minutes).	EMC000001, binder p.15
2025-03-14	08:09 to 08:13	Tracing window at admission. Annotation: "08:09 position change".	EMC000007, binder p.16
2025-03-14	08:10	Labor and delivery admission, 39w0d, active labor, cervix 4 cm. "Category I."	DOE000301, binder p.17
2025-03-15	00:37 to 00:41	Tracing window. Annotation: "00:37 IV bolus".	EMC000254, binder p.18
2025-03-15	00:40	Testimony of R. Specimen, R.N. (taken 2026-05-06): "I called at 00:40." Monitor showed "Recurrent late decelerations with minimal variability." Obstetrician "came at about 01:15."	DOETR000062, binder p.19
2025-03-15	01:15	Testimony of B. Template, M.D. (taken 2026-05-21): on arrival at 01:15, "Minimal variability and recurrent late decelerations." Cervix 8 cm.	DOETR000210, binder p.20
2025-03-15	02:17 to 02:21	Tracing window. Annotation: "02:18 prolonged deceleration begins; 02:24 decision for cesarean".	EMC000279, binder p.21
2025-03-15	02:24 to 02:47	Delivery note: decision for cesarean 02:24; skin incision 02:41; time of birth 02:47. Loose nuchal cord x1; clear fluid.	DOE000356, binder p.22
2025-03-15	02:45 to 02:49	Last tracing window in the printout. Annotation: "02:45 prolonged deceleration continues".	EMC000286, binder p.23
2025-03-15	02:49	Cord gases collected (resulted 03:02). Arterial pH 6.94, base deficit 16 mmol/L; venous pH 7.06, base deficit 12 mmol/L.	DOE000420, binder p.24
2025-03-15	03:05	NICU admission. Apgar scores 1, 3 and 5. Positive pressure ventilation from 30 seconds; intubated at 4 minutes. Exam at 45 minutes: "Modified Sarnat: moderate."	DOE000413, binder p.25
2025-03-15	04:40	Therapeutic hypothermia started at 1 hour 53 minutes of age; target 33.5 C reached 05:25.	DOE000455, binder p.26
2025-03-15	11:48	aEEG: electrographic seizures first noted (9 hours of age). Phenobarbital 20 mg/kg load 12:05.	DOE000471, binder p.27
2025-03-15	not stated	Placenta received by pathology (reported 2025-03-19): focal villous edema; no acute chorioamnionitis; no funisitis.	EMC000545, binder p.28
2025-03-16 to 2025-03-18	not stated	Continuous video EEG during hypothermia: 6 electrographic seizures on day 1, none after 2025-03-16 06:00.	DOE001650, binder p.29
2025-03-20	not stated	MRI brain, day of life 5: restricted diffusion in the bilateral ventrolateral thalami and posterior putamina.	DOE001641, binder p.30
2026-03-18	not stated	Neurology clinic, age 12 months: increased tone in all four extremities; motor delay; physical therapy through early intervention.	DOE001295, binder p.31

4. CV, publication list and testimony list

The CV as sent by the expert is bundled at [binder p.38](#) (6 pages).
The report's own lists: Appendix A, report page 6, at [binder p.11](#); Appendix B, report page 7, at [binder p.12](#).
Publication list: CV entries published in the ten years before the binder date (2016-08-05 to 2026-08-05), in the CV's order and wording.
28 of the CV's 40 entries fall inside the window by year; no entry is dated 2016, so none needs a month check.

No.	Entry as the CV prints it	CV page
1	Example A, Sample B, Holder C, Placer D. Cord gas sampling practices in community delivery units: a regional audit. Journal of Example Neonatology. 2026;36(1):100-105.	CV page 3, binder p.40
2	Mockley E, Fictor F, Example A, Dummett G, Specimen H. Early amplitude-integrated EEG patterns after sentinel events: a case series. Example Journal of Neonatal Neurology. 2026;22(2):137-143.	CV page 3, binder p.40
3	Example A, Specimen H, Proxy J. Timing of transfer to a cooling center for outborn infants: a retrospective review. Sample Journal of Perinatal Medicine. 2025;27(3):174-181.	CV page 3, binder p.40
4	Notion L, Example A, Surrogate M, Figment N. Glucose monitoring intervals in late preterm infants: a quality improvement report. Journal of Example Neonatology. 2025;35(4):211-219.	CV page 3, binder p.40
5	Sample B, Holder C, Placer D, Example A, Mockley E, Fictor F. Neonatal encephalopathy scoring at six hours: interobserver agreement. Example Pediatrics Review. 2025;40(5):248-257.	CV page 3, binder p.40
6	Example A, Mockley E, Fictor F. Placental pathology reporting in neonatal encephalopathy: a standardized template. Archives of Example Child Health. 2024;54(6):285-295.	CV page 3, binder p.40
7	Specimen H, Proxy J, Example A, Standish K. Umbilical venous catheter tip position on radiograph and ultrasound. Placeholder Perinatology Letters. 2024;24(1):322-333.	CV page 3, binder p.40
8	Example A, Notion L, Surrogate M, Figment N, Sample B. Delayed cord clamping in infants born by cesarean section: outcomes at one center. Journal of Example Neonatology. 2023;33(2):359-371.	CV page 3, binder p.40
9	Sample B, Example A, Holder C. Magnetic resonance timing after therapeutic hypothermia: a practice survey. Example Journal of Neonatal Neurology. 2023;19(3):396-409.	CV page 3, binder p.40
10	Example A, Mockley E, Fictor F, Dummett G. Maternal fever in labor and neonatal sepsis evaluation: a cohort description. Journal of Sample Maternal-Fetal Care. 2022;27(4):433-438.	CV page 3, binder p.40
11	Example A, Specimen H, Proxy J. Apgar score documentation in electronic records: completeness and timing. Journal of Example Neonatology. 2022;32(5):470-476.	CV page 3, binder p.40
12	Notion L, Surrogate M, Example A, Figment N, Sample B. Neonatal resuscitation team composition at twelve delivery hospitals. Sample Journal of Perinatal Medicine. 2022;24(6):507-514.	CV page 3, binder p.40
13	Example A, Sample B. Hypoglycemia screening thresholds in infants of diabetic mothers: a review. Example Pediatrics Review. 2021;36(1):544-552.	CV page 3, binder p.40
14	Mockley E, Example A, Fictor F, Dummett G. Follow-up clinic attendance after neonatal intensive care discharge. Archives of Example Child Health. 2021;51(2):581-590.	CV page 3, binder p.40
15	Example A, Specimen H, Proxy J, Standish K. Passive cooling during neonatal transport: temperature records from one service. Journal of Example Neonatology. 2020;30(3):618-628.	CV page 4, binder p.41
16	Notion L, Surrogate M, Figment N, Example A. Nuchal cord at delivery and early neonatal course: a descriptive series. Placeholder Perinatology Letters. 2020;20(4):655-666.	CV page 4, binder p.41
17	Example A, Sample B, Holder C, Placer D, Mockley E. Seizure detection by bedside monitoring in encephalopathic neonates. Example Journal of Neonatal Neurology. 2020;16(5):692-704.	CV page 4, binder p.41
18	Mockley E, Example A, Fictor F. Fetal heart rate category documentation in the hour before birth. Journal of Sample Maternal-Fetal Care. 2019;24(6):729-742.	CV page 4, binder p.41
19	Example A, Specimen H, Proxy J. Oxygen saturation targets in the delivery room: a record review. Journal of Example Neonatology. 2019;29(1):766-771.	CV page 4, binder p.41
20	Notion L, Surrogate M, Example A, Figment N. Blood gas reporting units across regional laboratories. Sample Journal of Perinatal Medicine. 2018;20(2):803-809.	CV page 4, binder p.41
21	Example A, Sample B, Holder C. Neonatal hyperbilirubinemia follow-up after early discharge. Example Pediatrics Review. 2018;33(3):840-847.	CV page 4, binder p.41
22	Mockley E, Example A, Fictor F, Dummett G, Specimen H. Head ultrasound screening schedules in preterm infants: a survey. Archives of Example Child Health. 2018;48(4):877-885.	CV page 4, binder p.41
23	Example A, Specimen H, Proxy J, Standish K. Surfactant administration timing in moderate preterm infants. Journal of Example Neonatology. 2017;27(5):114-123.	CV page 4, binder p.41
24	Notion L, Surrogate M, Example A. Shoulder dystocia documentation and neonatal examination findings. Placeholder Perinatology Letters. 2017;17(6):151-161.	CV page 4, binder p.41
25	Example A, Sample B, Holder C. Encephalopathy grading tools in clinical use: a comparison. Example Journal of Neonatal Neurology. 2017;13(1):188-199.	CV page 4, binder p.41
26	Mockley E, Fictor F, Dummett G, Example A, Specimen H. Chorioamnionitis definitions in obstetric and neonatal records. Journal of Sample Maternal-Fetal Care. 2017;22(2):225-237.	CV page 4, binder p.41
27	Example A, Specimen H. Neonatal transport call logs as a quality measure. Journal of Example Neonatology. 2017;27(3):262-275.	CV page 4, binder p.41

No.	Entry as the CV prints it	CV page
28	Notion L, Example A, Surrogate M, Figment N. Capillary refill assessment in the newborn: observer variation. Sample Journal of Perinatal Medicine. 2017;19(4):299-304.	CV page 4, binder p.41

The qualifications self-audit (service 2) reported, for this list: CV entry 13 was not found in the literature index searched, and two index entries under the same author name are not on the CV (one dated 2022 and one dated 2019). They are listed in the self-audit register for the expert to confirm or delete and are not added here.

Testimony list, four years before the binder date

From the testimony list register (service 1), compiled from the expert's engagement letters, invoices, notices, subpoenas and transcript covers; events from 2022-08-05 to 2026-08-05. Bracketed fields are open questions in that register for the expert. The 2026-08-12 deposition in this case is after the binder date and is not listed. The register holds a source page link for every field.

No.	Court	Parties	Case number	Type	Date
1	Superior Court of Example County	D. Cedar v. Sampleton General Hospital	EX-2022-CV-0208	Deposition	2022-10-04
2	United States District Court for the District of Example (SYNTHETIC)	E. Dunn v. Mock Valley Medical Center	EXD-1:22-cv-00418-SYN	Deposition	2022-12-13
3	Circuit Court of Sample County	F. Elm v. Sample Children's Hospital	SC-2022-L-0301	Deposition	2023-02-07
4	Superior Court of Example County	G. Fir v. Example Obstetrics Group	[case number to be supplied by Dr. Example; U-01]	Deposition	2023-03-22
5	United States District Court for the District of Example (SYNTHETIC)	I. Hart v. Example Medical Center	EXD-1:23-cv-00102-SYN	Deposition	2023-05-16
6	Circuit Court of Sample County	J. Ivy v. Sampleton General Hospital	SC-2023-L-0077	Deposition	2023-06-27
7	Circuit Court of Sample County	F. Elm v. Sample Children's Hospital	SC-2022-L-0301	Trial	2023-09-19
8	Circuit Court of Sample County	L. Kerr v. Sample Children's Hospital	SC-2023-L-0190	Deposition	2023-10-10
9	Circuit Court of Sample County	R. Lin, as Personal Representative of the Estate of P. Lin, v. Sampleton General Hospital, et al.	SC-2023-L-0118	Deposition	2023-11-14
10	Superior Court of Example County	N. Moss v. Mock Valley Medical Center	[case number to be supplied by Dr. Example; U-02]	Deposition	2024-01-23
11	United States District Court for the District of Example (SYNTHETIC)	O. Nash v. Example Medical Center	EXD-1:23-cv-00655-SYN	Deposition	2024-02-20
12	Circuit Court of Sample County	Q. Pine v. Sample Children's Hospital	SC-2024-L-0033	Deposition	2024-04-09
13	Circuit Court of Sample County	R. Lin, as Personal Representative of the Estate of P. Lin, v. Sampleton General Hospital, et al.	SC-2023-L-0118	Trial	2024-05-07
14	Superior Court of Example County	S. Quill v. Riverbend Regional Medical Center	EX-2024-CV-0126	Deposition	2024-06-04
15	Circuit Court of Sample County	T. Reed v. Placeholder Women's Clinic	[case number to be supplied by Dr. Example; U-03]	Deposition	2024-07-16
16	United States District Court for the District of Example (SYNTHETIC)	U. Sage v. Sampleton General Hospital	EXD-1:24-cv-00207-SYN	Deposition	2024-08-27
17	Circuit Court of Sample County	Q. Pine v. Sample Children's Hospital	SC-2024-L-0033	Trial	2024-10-22
18	Circuit Court of Sample County	W. Upton v. Mock Valley Medical Center	SC-2024-L-0412	Deposition	2025-01-14
19	United States District Court for the District of Example (SYNTHETIC)	U. Sage v. Sampleton General Hospital	EXD-1:24-cv-00207-SYN	Trial	2025-03-11
20	Superior Court of Example County	X. Vale v. Sample Children's Hospital	EX-2024-CV-0811	Deposition	2025-04-29
21	United States District Court for the District of Example (SYNTHETIC)	Y. West v. Example Obstetrics Group	EXD-1:25-cv-00907-SYN	Deposition	2025-06-17
22	Circuit Court of Sample County	Z. Young v. Sampleton General Hospital	SC-2025-L-0056	Deposition	2025-09-09
23	Circuit Court of Sample County	B. Abbot v. Riverbend Regional Medical Center	SC-2025-L-0290	Deposition	2025-11-18
24	United States District Court for the District of Example (SYNTHETIC)	C. Baines v. Mock Valley Medical Center	EXD-1:25-cv-01044-SYN	Deposition	2026-01-27
25	Circuit Court of Sample County	B. Abbot v. Riverbend Regional Medical Center	SC-2025-L-0290	Trial	2026-04-14

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

A. EXAMPLE, M.D.

CURRICULUM VITAE (SYNTHETIC)

Example Neonatal Associates | 100 Sample Way, Example City, State of Example | a.example@example.com

EDUCATION

1999	B.S., Biology, Example State University
2003	M.D., Example State University College of Medicine

POSTGRADUATE TRAINING

2003 to 2006	Residency, Pediatrics, Example University Hospital
2006 to 2007	Chief Resident, Pediatrics, Example University Hospital
2007 to 2010	Fellowship, Neonatal-Perinatal Medicine, Example University Hospital

LICENSURE

2006	Physician and Surgeon, State of Example, License No. SYN-MD-04417 (active)
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BOARD CERTIFICATION

2011	Neonatal-Perinatal Medicine, American Board of Example Pediatrics
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IDENTIFIERS

Registry	National provider identifier: SYN-NPI-0000
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SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

ACADEMIC APPOINTMENTS

2014 to present Clinical Associate Professor of Pediatrics, Example University School of Medicine

2010 to 2014 Clinical Assistant Professor of Pediatrics, Example University School of Medicine

PROFESSIONAL POSITIONS

2010 to present Partner, Example Neonatal Associates, 100 Sample Way, Example City

2018 to present Medical Director, Neonatal Intensive Care Unit, Hillcrest Example Hospital

HOSPITAL STAFF PRIVILEGES

2010 to present Active staff, Hillcrest Example Hospital

2010 to present Courtesy staff, Example University Hospital

HONORS AND AWARDS

2019 Excellence in Teaching Award, Department of Pediatrics, Example University School of Medicine

PROFESSIONAL MEMBERSHIPS

2011 to present Fellow, Example Academy of Pediatrics

2008 to present Member, Example Perinatal Society

COMMITTEES

2019 to present Perinatal Quality Committee, Hillcrest Example Hospital

2016 to 2020 Neonatal Transport Advisory Group, Sample Regional Perinatal Network

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

PEER-REVIEWED PUBLICATIONS

1. Example A, Sample B, Holder C, Placer D. Cord gas sampling practices in community delivery units: a regional audit. *Journal of Example Neonatology*. 2026;36(1):100-105.
2. Mockley E, Fictor F, Example A, Dummett G, Specimen H. Early amplitude-integrated EEG patterns after sentinel events: a case series. *Example Journal of Neonatal Neurology*. 2026;22(2):137-143.
3. Example A, Specimen H, Proxy J. Timing of transfer to a cooling center for outborn infants: a retrospective review. *Sample Journal of Perinatal Medicine*. 2025;27(3):174-181.
4. Notion L, Example A, Surrogate M, Figment N. Glucose monitoring intervals in late preterm infants: a quality improvement report. *Journal of Example Neonatology*. 2025;35(4):211-219.
5. Sample B, Holder C, Placer D, Example A, Mockley E, Fictor F. Neonatal encephalopathy scoring at six hours: interobserver agreement. *Example Pediatrics Review*. 2025;40(5):248-257.
6. Example A, Mockley E, Fictor F. Placental pathology reporting in neonatal encephalopathy: a standardized template. *Archives of Example Child Health*. 2024;54(6):285-295.
7. Specimen H, Proxy J, Example A, Standish K. Umbilical venous catheter tip position on radiograph and ultrasound. *Placeholder Perinatology Letters*. 2024;24(1):322-333.
8. Example A, Notion L, Surrogate M, Figment N, Sample B. Delayed cord clamping in infants born by cesarean section: outcomes at one center. *Journal of Example Neonatology*. 2023;33(2):359-371.
9. Sample B, Example A, Holder C. Magnetic resonance timing after therapeutic hypothermia: a practice survey. *Example Journal of Neonatal Neurology*. 2023;19(3):396-409.
10. Example A, Mockley E, Fictor F, Dummett G. Maternal fever in labor and neonatal sepsis evaluation: a cohort description. *Journal of Sample Maternal-Fetal Care*. 2022;27(4):433-438.
11. Example A, Specimen H, Proxy J. Apgar score documentation in electronic records: completeness and timing. *Journal of Example Neonatology*. 2022;32(5):470-476.
12. Notion L, Surrogate M, Example A, Figment N, Sample B. Neonatal resuscitation team composition at twelve delivery hospitals. *Sample Journal of Perinatal Medicine*. 2022;24(6):507-514.
13. Example A, Sample B. Hypoglycemia screening thresholds in infants of diabetic mothers: a review. *Example Pediatrics Review*. 2021;36(1):544-552.
14. Mockley E, Example A, Fictor F, Dummett G. Follow-up clinic attendance after neonatal intensive care discharge. *Archives of Example Child Health*. 2021;51(2):581-590.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

PEER-REVIEWED PUBLICATIONS (CONTINUED)

15. Example A, Specimen H, Proxy J, Standish K. Passive cooling during neonatal transport: temperature records from one service. *Journal of Example Neonatology*. 2020;30(3):618-628.
16. Notion L, Surrogate M, Figment N, Example A. Nuchal cord at delivery and early neonatal course: a descriptive series. *Placeholder Perinatology Letters*. 2020;20(4):655-666.
17. Example A, Sample B, Holder C, Placer D, Mockley E. Seizure detection by bedside monitoring in encephalopathic neonates. *Example Journal of Neonatal Neurology*. 2020;16(5):692-704.
18. Mockley E, Example A, Fictor F. Fetal heart rate category documentation in the hour before birth. *Journal of Sample Maternal-Fetal Care*. 2019;24(6):729-742.
19. Example A, Specimen H, Proxy J. Oxygen saturation targets in the delivery room: a record review. *Journal of Example Neonatology*. 2019;29(1):766-771.
20. Notion L, Surrogate M, Example A, Figment N. Blood gas reporting units across regional laboratories. *Sample Journal of Perinatal Medicine*. 2018;20(2):803-809.
21. Example A, Sample B, Holder C. Neonatal hyperbilirubinemia follow-up after early discharge. *Example Pediatrics Review*. 2018;33(3):840-847.
22. Mockley E, Example A, Fictor F, Dummett G, Specimen H. Head ultrasound screening schedules in preterm infants: a survey. *Archives of Example Child Health*. 2018;48(4):877-885.
23. Example A, Specimen H, Proxy J, Standish K. Surfactant administration timing in moderate preterm infants. *Journal of Example Neonatology*. 2017;27(5):114-123.
24. Notion L, Surrogate M, Example A. Shoulder dystocia documentation and neonatal examination findings. *Placeholder Perinatology Letters*. 2017;17(6):151-161.
25. Example A, Sample B, Holder C. Encephalopathy grading tools in clinical use: a comparison. *Example Journal of Neonatal Neurology*. 2017;13(1):188-199.
26. Mockley E, Fictor F, Dummett G, Example A, Specimen H. Chorioamnionitis definitions in obstetric and neonatal records. *Journal of Sample Maternal-Fetal Care*. 2017;22(2):225-237.
27. Example A, Specimen H. Neonatal transport call logs as a quality measure. *Journal of Example Neonatology*. 2017;27(3):262-275.
28. Notion L, Example A, Surrogate M, Figment N. Capillary refill assessment in the newborn: observer variation. *Sample Journal of Perinatal Medicine*. 2017;19(4):299-304.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

PEER-REVIEWED PUBLICATIONS (CONTINUED)

29. Example A, Sample B, Holder C, Placer D. Therapeutic hypothermia eligibility criteria at regional centers. *Journal of Example Neonatology*. 2015;25(5):336-342.
30. Mockley E, Fictor F, Example A, Dummett G, Specimen H. Parenteral nutrition start times in very low birth weight infants. *Example Pediatrics Review*. 2015;30(6):373-380.
31. Specimen H, Example A, Proxy J. Neonatal abstinence scoring in a community nursery. *Archives of Example Child Health*. 2014;44(1):410-418.
32. Example A, Notion L, Surrogate M. Delivery room temperature management for preterm infants. *Journal of Example Neonatology*. 2013;23(2):447-456.
33. Sample B, Holder C, Example A, Placer D. Meconium-stained amniotic fluid and admission rates. *Placeholder Perinatology Letters*. 2013;13(3):484-494.
34. Example A, Mockley E, Fictor F, Dummett G. Early-onset sepsis calculators in a mixed-acuity nursery. *Sample Journal of Perinatal Medicine*. 2012;14(4):521-532.
35. Specimen H, Example A, Proxy J. Amplitude-integrated EEG interpretation training for fellows. *Example Journal of Neonatal Neurology*. 2011;7(5):558-570.
36. Example A, Notion L, Surrogate M. Cord blood gas reference values at a single center. *Journal of Example Neonatology*. 2010;20(6):595-608.
37. Sample B, Holder C, Example A, Placer D. Transient tachypnea of the newborn after elective cesarean birth. *Example Pediatrics Review*. 2009;24(1):632-637.
38. Mockley E, Example A, Fictor F, Dummett G, Specimen H. Neonatal hypoglycemia protocols: a statewide survey. *Archives of Example Child Health*. 2008;38(2):669-675.
39. Example A, Specimen H. Postnatal cord lactate in term infants: a pilot study. *Journal of Sample Maternal-Fetal Care*. 2007;12(3):706-713.
40. Notion L, Surrogate M, Figment N, Example A. Resident attendance at high-risk deliveries: a time study. *Journal of Example Neonatology*. 2005;15(4):743-751.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

INVITED LECTURES AND PRESENTATIONS

2025	Neonatal encephalopathy: timing questions in the record. Example Perinatal Society Annual Meeting, Example City.
2025	Cord gas interpretation for obstetric teams. Sample Regional Perinatal Network, Sample City.
2024	Cooling transport logistics. Placeholder Neonatal Transport Symposium.
2024	Documentation in the delivery room. Example University Grand Rounds.
2023	Glucose monitoring in late preterm infants. Example Academy of Pediatrics, State Chapter.
2023	Placental pathology for neonatologists. Sample Children's Pediatric Update.
2022	Seizure detection at the bedside. Example Neurology and Neonatology Forum.
2021	Resuscitation team roles. Hillcrest Example Hospital Nursing Education Day.
2020	Transport temperature management. Example Perinatal Society Annual Meeting.
2019	Encephalopathy grading in practice. Example University Grand Rounds.
2018	Oxygen targets in the delivery room. Sample Regional Perinatal Network.
2017	Surfactant timing in moderate preterm infants. Placeholder Neonatal Symposium.

ATTESTATION

I certify that this curriculum vitae is a true and correct statement of my education, training and professional activities.

A. Example, M.D.

August 2026

5. Invoices and hours for this case

Time entries for this matter (ledger matter M01) dated on or before 2026-08-05, as the expert recorded them in the time log, at the review rate in the signed retention terms. From the practice ledger (service 5), which covers 2026-07-01 onward.

Log line	Date	Task as the expert described it	Hours	Rate	Amount	Time log page
3	2026-07-06	Reviewed supplemental records production 3 (L&D nursing notes)	2.5	\$500	\$1,250.00	time log page 1, binder p.48
11	2026-07-14	Reviewed fetal monitoring strips	3.0	\$500	\$1,500.00	time log page 1, binder p.48
16	2026-07-21	Call w/ counsel re depo scheduling	0.3	\$500	\$150.00	time log page 1, binder p.48
22	2026-07-28	Reviewed defense expert report	2.8	\$500	\$1,400.00	time log page 1, binder p.48
27	2026-08-04	Depo prep: reread my report and cited records	3.5	\$500	\$1,750.00	time log page 2, binder p.49
Total			12.1		\$6,050.00	

Invoices for this matter issued on or before 2026-08-05: none in the practice ledger. The entries above were not yet invoiced on the binder date. Time before 2026-07-01, including report preparation before service on 2026-06-30, is outside the ledger sample and is not shown.

Fee terms as the documents state them

Rate or term	As stated	Page
Record review, report preparation, conferences	"\$500 per hour"	fee schedule, binder p.46
Deposition testimony	"\$600 per hour, 2-hour minimum", billed to the party noticing the deposition	fee schedule, binder p.46
Trial testimony	"\$5,000 per day"	fee schedule, binder p.46
Signed retention terms, this matter (2026-01-15)	Review \$500 per hour; deposition \$600 per hour with a 2-hour minimum, billed to the party that notices the deposition; trial \$5,000 per day; no retainer	terms, binder p.47
Deposition notice (dated 2026-07-20)	"The noticing party will pay the witness's reasonable fee for time spent at the deposition, at the rate stated in the witness's fee schedule."	notice, binder p.45

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

SYNTHETIC SOURCE DOCUMENT (input the expert sends)

SUPERIOR COURT OF EXAMPLE COUNTY

Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al.
Case No. EX-2025-CV-0417

NOTICE OF DEPOSITION OF A. EXAMPLE, M.D.

PLEASE TAKE NOTICE that Fictive Ford LLP will take the oral deposition of A. Example, M.D., on August 12, 2026, beginning at 9:00 a.m., at 200 Placeholder Plaza, Example City, before a certified court reporter, and continuing until completed.

The noticing party will pay the witness's reasonable fee for time spent at the deposition, at the rate stated in the witness's fee schedule.

Dated: July 20, 2026.

/s/ Fran Fictive, Fictive Ford LLP (SYNTHETIC)

Invented notice for a SYNTHETIC work sample. No real court or case.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Neonatal Associates

A. Example, M.D., Neonatal-Perinatal Medicine
100 Sample Way, Example City, State of Example | a.example@example.com

SYNTHETIC SOURCE DOCUMENT (input the expert sends)

Fee Schedule, effective January 1, 2026

Service	Rate
Record review, literature review, report preparation, conferences	\$500 per hour
Deposition testimony (billed to the party noticing the deposition)	\$600 per hour, 2-hour minimum
Trial testimony	\$5,000 per day
Travel time	Billed at the record review rate, portal to portal
Retainer	As stated in the signed retention terms for each matter
Payment terms	Due within 30 days of the invoice date; ACH or check

Compensation does not depend on the outcome of any matter. Invented fee schedule for a SYNTHETIC work sample.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.

Example Neonatal Associates

A. Example, M.D., Neonatal-Perinatal Medicine
100 Sample Way, Example City, State of Example | a.example@example.com

SYNTHETIC SOURCE DOCUMENT (input the expert sends)

Retention Terms: M01

Matter Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al.

Court and case number Superior Court of Example County, EX-2025-CV-0417

Retaining counsel Sam Sample, Sample & Sample LLP

Date of terms January 15, 2026

- 1. Rates. Record review, report preparation and conferences: \$500 per hour. Deposition testimony: \$600 per hour with a 2-hour minimum, billed to the party that notices the deposition. Trial testimony: \$5,000 per day.
- 2. Retainer. No retainer is required for this matter.
- 3. Invoices. Invoices are issued monthly or at the close of a quarter, list each task with its date and hours, and are due within 30 days of the invoice date.
- 4. Outcome. Compensation does not depend on the outcome of the matter or on the content of any opinion.
- 5. Records. The expert keeps time records by date and task for every matter.

Agreed: /s/ Sam Sample, Sample & Sample LLP Date: January 15, 2026

Agreed: /s/ A. Example, M.D. Date: January 15, 2026

Invented terms for a SYNTHETIC work sample. Not a form for use.

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.**SYNTHETIC SOURCE DOCUMENT (input the expert sends)****Time log export, July 1 to September 30, 2026 (page 1 of 3)**

Exported by the expert from a notes app. Wording, matter shorthand and hours are the expert's own.

Line	Date	Matter	What I did	Hours
1	2026-07-01	LP/Sample Valley	Record review	2.0
2	2026-07-02	AC/Riverbend	Reviewed counsel's comments on draft report	1.5
3	2026-07-06	Doe/EMC	Reviewed supplemental records production 3 (L&D nursing notes)	2.5
4	2026-07-06	JS/Sample Birth Ctr	Record review, birth center chart	2.5
5	2026-07-07	RM/Sample Childrens	Depo prep, reviewed chart	2.5
6	2026-07-08	LP/Sample Valley	Record review, cont.	1.5
7	2026-07-09	AC/Riverbend	Report revisions	3.0
8	2026-07-10	TK/Example Womens	Initial record review, prenatal records	3.0
9	2026-07-13	AC/Riverbend	Literature review, neonatal hypoglycemia	2.0
10	2026-07-13	BW/Example Health	Reviewed mediation statement excerpts	0.8
11	2026-07-14	Doe/EMC	Reviewed fetal monitoring strips	3.0
12	2026-07-15	LP/Sample Valley	Call w/ counsel	0.5
13	2026-07-16	JS/Sample Birth Ctr	Record review, transfer and hospital records	3.0
14	2026-07-17	TK/Example Womens	Initial record review, delivery and NICU records	3.5
15	2026-07-20	AC/Riverbend	Call w/ counsel	0.5
16	2026-07-21	Doe/EMC	Call w/ counsel re depo scheduling	0.3
17	2026-07-21	RM/Sample Childrens	Depo prep meeting w/ counsel	1.5
18	2026-07-22	RM/Sample Childrens	Deposition testimony (noticed by Notional Nash LLP)	1.5
19	2026-07-23	CC pre-suit	Pre-suit record review	2.0
20	2026-07-24	TK/Example Womens	Call w/ counsel, preliminary views	0.8
21	2026-07-27	BW/Example Health	Call w/ counsel re mediation	0.5
22	2026-07-28	Doe/EMC	Reviewed defense expert report	2.8
23	2026-07-29	LP/Sample Valley	Reviewed placental pathology report	0.5
24	2026-07-30	JS/Sample Birth Ctr	Call w/ counsel	0.6
25	2026-07-31	CC pre-suit	Pre-suit record review, cont.	1.5
26	2026-08-03	AC/Riverbend	Prepared disclosure materials (CV, testimony list, fee info)	1.0

SYNTHETIC SAMPLE WORK PRODUCT. Invented data for demonstration. No real person, patient, court or case.**SYNTHETIC SOURCE DOCUMENT (input the expert sends)****Time log export, July 1 to September 30, 2026 (page 2 of 3)**

Exported by the expert from a notes app. Wording, matter shorthand and hours are the expert's own.

Line	Date	Matter	What I did	Hours
27	2026-08-04	Doe/EMC	Depo prep: reread my report and cited records	3.5
28	2026-08-06	RM/Sample Childrens	Reviewed transcript and errata	1.2
29	2026-08-07	CC pre-suit	Call w/ counsel	0.5
30	2026-08-10	Doe/EMC	Depo prep meeting w/ counsel (video)	2.0
31	2026-08-11	TK/Example Womens	Reviewed imaging reports	1.5
32	2026-08-12	Doe/EMC	Deposition testimony (noticed by Fictive Ford LLP)	4.5
33	2026-08-14	JS/Sample Birth Ctr	Reviewed FHR documentation	1.8
34	2026-08-18	AC/Riverbend	Reviewed supplemental NICU records	2.2
35	2026-08-19	LP/Sample Valley	Reviewed depo of treating neonatologist	2.0
36	2026-08-20	BW/Example Health	Reviewed updated life care plan	1.5
37	2026-08-21	CC pre-suit	Reviewed additional records	1.0
38	2026-08-24	Doe/EMC	Emails w/ counsel re transcript	0.2
39	2026-08-25	RM/Sample Childrens	Reviewed plaintiff's rebuttal report	2.0
40	2026-08-27	TK/Example Womens	Report outline	2.0
41	2026-08-28	JS/Sample Birth Ctr	Literature review	1.4
42	2026-09-01	LP/Sample Valley	Literature search	1.0
43	2026-09-02	RM/Sample Childrens	Literature review	1.5
44	2026-09-03	AC/Riverbend	Reviewed defense expert disclosure	1.8
45	2026-09-04	CC pre-suit	Written summary of review for counsel	1.5
46	2026-09-08	Doe/EMC	Reviewed final depo transcript pp. 1 to 90	2.5
47	2026-09-09	LP/Sample Valley	Call w/ counsel	0.3
48	2026-09-10	Doe/EMC	Reviewed final depo transcript pp. 91 to 180	2.4
49	2026-09-11	BW/Example Health	Emails w/ counsel	0.3
50	2026-09-14	JS/Sample Birth Ctr		1.2
51	2026-09-15	Doe/EMC	Reviewed errata candidate list	0.8
52	2026-09-16	RM/Sample Childrens	Drafted supplemental report	3.0

6. Prior public statements

Entries from the public-record tab of the qualifications self-audit (service 2), quoted as the mock sources print them. They are the only public-record entries the self-audit located. They name the expert; none is a statement by the expert on this case's topics. No other search was run for the binder. The R4 and license rows carry the self-audit's capture date (2026-09-24), which is later than the binder date because the self-audit sample was built later; in a live binder the self-audit date comes first.

Result	Court or agency	Matter	Date	Text naming the expert, quoted	Capture
R1	Circuit Court of Sample County	Q. Pine v. Sample Children's Hospital, SC-2024-L-0033	2024-10-22	"Plaintiff's witness A. Example, M.D., testified."	CAP-10, binder p.51
R2	United States District Court for the District of Example (SYNTHETIC)	U. Sage v. Sampleton General Hospital, EXD-1:24-cv-00207-SYN	2025-03-11	"Witness A. Example, M.D., sworn and testified."	CAP-10, binder p.51
R3	United States District Court for the District of Example (SYNTHETIC)	C. Baines v. Mock Valley Medical Center, EXD-1:25-cv-01044-SYN	2026-03-18	"The motion to exclude the testimony of A. Example, M.D. is denied."	CAP-10, binder p.51
R4	State of Example Medical Board	Public actions, license SYN-MD-04417	2026-09-24	"None on file"	CAP-10, binder p.51
Also	State of Example Medical Board	License lookup, SYN-MD-04417	2026-09-24	"Public actions: None on file"	CAP-01, binder p.52

SYNTHETIC MOCK CAPTURE. Invented page at an invented address. Not a real website, registry or record.

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https://records.example.org/search?q=%22A.+Example%22

Back to index

CAP-10 | Captured 2026-09-24 | Public record search: court records naming the expert (mock)

PUBLIC RECORDS SEARCH

Search: "A. Example" in court records and medical board public actions (mock)

Result	Court or agency	Case	Date	Text naming the expert
R1	Circuit Court of Sample County	Q. Pine v. Sample Children's Hospital, SC-2024-L-0033	2024-10-22	"Plaintiff's witness A. Example, M.D., testified."
R2	United States District Court for the District of Example (SYNTHETIC)	U. Sage v. Sampleton General Hospital, EXD-1:24-cv-00207-SYN	2025-03-11	"Witness A. Example, M.D., sworn and testified."
R3	United States District Court for the District of Example (SYNTHETIC)	C. Baines v. Mock Valley Medical Center, EXD-1:25-cv-01044-SYN	2026-03-18	"The motion to exclude the testimony of A. Example, M.D. is denied."
R4	State of Example Medical Board	Public actions, license SYN-MD-04417	2026-09-24	"None on file"

4 results. The R1 to R3 entries are the same invented matters used in the testimony list sample.

SYNTHETIC MOCK CAPTURE. Invented page at an invented address. Not a real website, registry or record.

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https://medical-board.example.org/license/SYN-MD-04417

Back to index

CAP-01 | Captured 2026-09-24 | State of Example medical board license lookup (mock)

STATE OF EXAMPLE MEDICAL BOARD

License verification (mock). Primary source verification for the State of Example.

Name	EXAMPLE, A.
License type	Physician and Surgeon
License number	SYN-MD-04417
Status	Active
Original issue date	2006-07-01
Expiration date	2027-06-30
Medical school	Example State University College of Medicine
Graduation year	2003
Public actions	None on file
Malpractice settlements reported	None reported

7. Topic index

The topics and search terms are fixed and the same for every expert. "Report pages" lists every report page that uses a search term (case ignored). "Binder sections" lists the sections that hold related documents. The index points to pages; it does not select or rank anything.

Topic	Search terms (fixed)	Report pages using a term	Binder sections
Qualifications	"qualif", "board cert", "curriculum vitae", "publication", "testified"	report page 1, binder p.6 report page 6, binder p.11 report page 7, binder p.12	CV, binder p.38 Publication list, binder p.35 Testimony list, binder p.37 Prior public statements, binder p.50
Materials reviewed	"reviewed", "materials", "considered", "appendix c", "produced"	report page 1, binder p.6 report page 5, binder p.10 report page 7, binder p.12	Materials-considered list, binder p.32 Received log, binder p.32 Chronology, binder p.34 Cited record pages, binder p.13
Assumptions	"assum", "have been told", "presum"	report page 1, binder p.6	Report cite check, binder p.3
Methodology	"method", "basis", "bases", "reasons", "alternative", "literature"	report page 1, binder p.6 report page 4, binder p.9 report page 5, binder p.10 report page 7, binder p.12	Report cite check, binder p.3 Cited record pages, binder p.13
Fees	"compensat", "fee", "hourly", "per hour", "invoice", "\$"	none of the terms appears in the report	Invoices and hours, binder p.44 Fee schedule, binder p.46 Retention terms, binder p.47 Deposition notice, binder p.45