

records, including but not limited to the admission,
Dr. 's records, and the autopsy.

Defendant reserves the right to supplement this designation as the depositions of Plaintiff, Plaintiff's experts, and treating physicians are not yet available. Defendant incorporates herein Ms. 's deposition testimony. Ms. trial testimony will include the opinions set forth herein, testified to at deposition, and all additional opinions related to same.

2.

Dr. is an Associate Professor at the . She practices Medical-Surgical Nursing at . A copy of her CV is attached hereto. If called to testify, Dr. will opine about the standard of care for nursing staff rendering care to Mr. during his admission. She is expected to opine that the nurses' actions during this admission complied with the standard of care in all respects. In particular, she is expected to opine that the nurses provided appropriate monitoring and timely notification of Mr. laboratory results and clinical changes. She may testify that the nurses' actions were not a proximate cause of Mr. death.

Dr. opinions are based upon her education, training, experience, familiarity with the literature, and review of pertinent pleadings, deposition transcripts, and the medical records, including but not limited to the admission, Dr. records, and the autopsy.

Defendant reserves the right to supplement this designation as the depositions of Plaintiff, Plaintiff's experts, and treating physicians are not yet available. Defendant incorporates herein

Dr. [redacted] deposition testimony. Dr. [redacted] trial testimony will include the opinions set forth herein, testified to at deposition, and all additional opinions related to same.

3.

Dr. [redacted] is board certified in internal medicine and hematology/oncology. A copy of his CV is attached hereto. If called to testify, Dr. [redacted] will opine that Mr. [redacted] anticoagulation was not a proximate cause of his death and that bleeding did not cause Mr. [redacted] demise. He is expected to opine that the blood thinning medications Mr. [redacted] received were appropriate medications, necessitated by his fracture, which did not harm Mr. [redacted]. He may opine that Mr. [redacted] died of kayexalate aspiration.

Dr. [redacted] opinions are based upon his education, training, experience, familiarity with the literature, and review of pertinent pleadings, deposition transcripts, and the medical records, including but not limited to the [redacted] admission, Dr. [redacted] records, and the autopsy.

Defendant reserves the right to supplement this designation as the depositions of Plaintiff, Plaintiff's experts, and treating physicians are not yet available. Defendant incorporates herein Dr. [redacted] deposition testimony. Dr. [redacted] trial testimony will include the opinions set forth herein, testified to at deposition, and all additional opinions related to same.

4.

[redacted] is a physician board-certified in Internal Medicine. He will testify based upon his education, training, experience, as well as his review of the medical records of

and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

5.

_____ is a physician board-certified in Internal Medicine. He will testify based upon his education, training, experience, as well as his review of the medical records of _____ and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

6.

_____ is a physician board-certified in Internal Medicine with a subspecialty in nephrology. He will testify based upon his education, training, experience, as well as his review of the medical records of _____ and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

7.

_____ is a physician specializing in family medicine. He will testify based upon his education, training, experience, as well as his review of the medical records of _____ and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

8.

_____ is a physician specializing in critical care medicine and pulmonology. He will testify based upon his education, training, experience, as well as his review of the medical records of _____ and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

9.

Dr. _____ is a pathologist. He will testify based upon his education, training, experience, as well as his review of _____ medical records and any discovery materials provided. His curriculum vitae and opinions were disclosed by Dr. _____ counsel and that information is incorporated herein.

10.

Mr. _____ is an economist. If called to testify, he will rebut the testimony of Plaintiff's economist

11. Defendant reserves the right to name any expert named by any other Defendant and not otherwise objected to. Defendant hereby cross-designates the experts designed by the other Defendants.

12. Defendant reserves the right to supplement this pleading as discovery has just commenced and no depositions have been conducted.

Respectfully submitted,

Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was mailed first class, postage prepaid, this 7TH day of February 2011, to:

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and**

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