

REPORT OF QUALIFIED EXPERT

I, [REDACTED], hereby certify, attest, and affirm that:

1. That I am a physician licensed to practice medicine in the State of Virginia.
2. That I am a board certified physician in the field of Internal Medicine and Geriatrics and have been engaged in the practice of medicine for the last [REDACTED] years.
3. I have over [REDACTED] years supervising nurses and other medical providers regarding the care and treatment of patients in a nursing home environment to include ostomy care.
4. That I have reviewed medical records of patient [REDACTED] (deceased) from Manor Care Nursing Home, and Franklin Square Hospital, and I have reviewed the death certificate.
5. I have also reviewed the Answers to Interrogatories from Manor Care.
6. That it is my opinion, within a reasonable degree of medical probability, that Manor Care Nursing Home, by and through its employees which include the medical staff that was assigned the responsibility for the ostomy care that [REDACTED] received which I have been informed by Manor Care include but are not limited to [REDACTED] and [REDACTED] [REDACTED] departed from the applicable standards of medical care during the time [REDACTED] was a resident at their facility (approx. March 29-April 13, [REDACTED]) and that this departure from the applicable standard of medical care directly and proximately caused a physical injury and death of [REDACTED]. The applicable standard of medical care for the above named medical providers was to provide proper ostomy care for the late [REDACTED] and not to allow fecal matter to infiltrate her body and cause her infection and death.
7. That the breaches of the applicable standard of medical care by the above mentioned health care providers include but are not limited to: 1) poor ostomy care which resulted in skin breakdown, infection, and death of [REDACTED], 2) no clear documentation in skin assessment instruments defining what is a severe compromise of skin integrity, 3) poor training for ostomy care resulting in frequent leaks and an inordinate waiting period for hygiene care, 4) failing to adequately communicate the problems that arose from the poor ostomy care to a physician, and 5) inadequate care of skin excoriation.
8. That I do not devote annually more than 20% of my professional activities to activities that directly involve testimony in personal injury claims,
9. That I am not a party to the pending litigation; that I am not an employee or partner of any party to the pending litigation; that I am not an employee or stockholder of any professional corporation of which any party of the pending litigation is a stockholder.
10. That this document does not contain all of my opinions and I reserve the right to amend this report upon receipt of additional information that may become available at a latter date.

[REDACTED]

[REDACTED]
DATE / /

CERTIFICATE OF QUALIFIED EXPERT

I, [REDACTED], hereby certify, attest, and affirm that:

1. That I am a physician licensed to practice medicine in the State of Virginia.
2. That I am a board certified physician in the field of Internal Medicine and Geriatrics and have been engaged in the practice of medicine for the last [REDACTED] years.
3. I have over [REDACTED] years supervising nurses and other medical providers regarding the care and treatment of patients in a nursing home environment to include ostomy care.
4. That I have reviewed medical records of patient [REDACTED] (deceased) from Manor Care Nursing Home, and Franklin Square Hospital, and I have reviewed the death certificate.
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6. That it is my opinion, within a reasonable degree of medical probability, that Manor Care Nursing Home, by and through its employees which include the medical staff that was assigned the responsibility for the ostomy care that [REDACTED] received which I have been informed by Manor Care include but are not limited to [REDACTED] and [REDACTED] [REDACTED] departed from the applicable standards of medical care during the time [REDACTED] was a resident at their facility (approx. March 29-April 13, [REDACTED] and that this departure from the applicable standard of medical care directly and proximately caused a physical injury and death of [REDACTED]. The applicable standard of medical care for the above named medical providers was to proper ostomy care for the late [REDACTED] and not to allow fecal matter to infiltrate her body and cause her infection and death.
7. That I do not devote annually more than 20% of my professional activities to activities that directly involve testimony in personal injury claims.
8. That I am not a party to the pending litigation; that I am not an employee or partner of any party to the pending litigation; that I am not an employee or stockholder of any professional corporation of which any party of the pending litigation is a stockholder.
9. That this document does not contain all of my opinions and I reserve the right to amend this report upon receipt of additional information that may become available at a latter date.

[REDACTED]

[REDACTED]
DATE/ /