

COPY

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**IN THE STATE COURT OF MUSCOGEE COUNTY
STATE OF GEORGIA**

SANDRA WILLIAMS,)
)
Plaintiff,)
)
vs.)
)
CHRISTOPHER K. TIDWELL, M.D.,)
CHRISTOPHER K. TIDWELL, M.D., P.C.,)
And ST. FRANCIS HOSPITAL, INC.,)
)
Defendants.)

CIVIL ACTION

FILE NO. SC14CV882

AMENDED CONSOLIDATED PRETRIAL ORDER

The following constitutes the Consolidated Pretrial Order entered in the above-styled case:

1.

The name, address and phone number of the attorneys who will conduct the trial are as follows:

For Plaintiff Sandra Williams:

Lloyd N. Bell, Esq.
Michael Watson, Esq.
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**GEORGIA, MUSCOGEE COUNTY
SUPERIOR / STATE COURT
FILED IN OFFICE**

NOV 15 2017

**DEPUTY CLERK
ANN L. HARDMAN, CLERK**

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**MUSCOGEE COUNTY
STATE COURT**

NOV 15 2017

**BENJAMIN RICHARDSON
FILED IN CHAMBERS**

For Defendants:

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and Christopher Tidwell, PC

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2.

The parties estimate the time required for trial as 1 to 2 weeks. The Tidwell Defendants expect to be able to present their case in approximately two (2) days. St. Francis expects to be able to present its case in approximately three (3) to four (4) days, depending on the Court's rulings on pending motions for summary judgment.

3.

There are no motions or other matters pending for consideration by the Court except as follows:

For the Plaintiff:

a. Plaintiff will file a Trial Brief regarding Georgia law on voir dire and jury * selection procedures;

b. Plaintiff will file motions in limine prior to the commencement of trial, although Plaintiff reserves the right to file additional motions at or during trial as issues may arise; and

For the Defendants:

For Tidwell Defendants:

Tidwell Defendants will be filing Motions in Limine and a Motion for Summary Judgment. These Defendants further reserve the right to file additional Motions prior to and during trial as evidentiary issues arise.

For St. Francis:

St. Francis has filed a Motion for Partial Summary Judgment with respect to liability of the St. Francis nurses and with respect to Plaintiff's claim for litigation expenses.

St. Francis will be filing Motions in Limine.

St. Francis reserves the right to file additional Motions prior to and during trial as evidentiary issues arise.

4.

The jury will be qualified as to the relationship with the following:

1. Sandra Williams,
2. Lloyd N. Bell, Michael Watson and Bell Law Firm,
3. Lawrence Schlachter, MD and Schlachter Law Firm, PC,
4. Darren Summerville and The Summerville Firm, LLC,
5. Andrew C. Dodgen, Esq. and Law Office of Andrew C. Dodgen,
6. Christopher Tidwell, MD and Christopher Tidwell, PC,

7. St. Francis Hospital, Inc.,
8. Ironshore Specialty Insurance Company,
9. Zurich American Insurance Company/Steadfast,
10. Med Mal Risk Retention Group,

5.

All discovery has been completed, unless otherwise noted, and the Court will not consider any further motions to compel discovery except for good cause shown. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence for use at trial.

By Plaintiff: Plaintiff has taken the deposition of Matthew Schlossberg, MD for purposes of use at trial since Dr. Schlossberg is unavailable to personally attend trial.

By Defendants:

For Tidwell Defendants:

Tidwell Defendants reserve the right to take a discovery deposition from any individual who has not been specifically identified in discovery as a person with knowledge of the facts, but who is identified in the Pretrial Order by a party as someone who may be called at trial.

For St. Francis:

The parties are scheduled to take the discovery deposition of Bruce A. Seaman, Ph.D. on October 20, 2017. All other discovery has been completed except as otherwise noted below. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence for use at trial.

St. Francis reserves the right to take the discovery deposition of any individual who has not been specifically identified in discovery as a person with knowledge of the facts, but who is identified in the Pretrial Order by a party as someone who may be called at trial.

St. Francis also reserves the right to conduct further discovery regarding any documentary or physical evidence or expert testimony listed herein by Plaintiffs which was not identified previously during discovery.

Unless otherwise noted, the names of the parties as shown in the caption to this order are correct and complete and there is no question by any party as to the misjoinder of or non-joinder of any parties.

6.

The following is the Plaintiff's brief and succinct outline of the case and contentions. Plaintiff provides the following outline for the court's benefit, but objects to any or all of it being read to the jury:

On October 17, 2012, Plaintiff Sandra Williams at St. Francis Hospital underwent an elective, 3-level anterior cervical fusion surgery. The surgery was successful, and Ms. Williams was discharged the following day, October 18th.

About 36 hours after discharge, around 1:30 am on October 20, 2012, Plaintiff's husband, Phillip Williams, telephoned the on-call service. Dr. Erik Westerlund was on-call that night and took the call. Mr. Williams informed Dr. Westerlund that his wife had problems swallowing since she was in the hospital and she was now "talking out of her head" – talking nonsense - which caused Mr. Williams to fear his wife was becoming dehydrated. Dr. Westerlund advised Mr. Williams to have his wife suck on popsicles, and consider going to the Emergency Room the following morning if her symptoms did not improve.

Shortly after speaking with Dr. Westerlund, Mr. Williams drove his wife to the Emergency Department at St. Francis Hospital. They arrived around 2:30 a.m. Ms. Williams was examined by the ED medical staff, who noted Ms. Williams had extensive neck swelling and was reporting burning, constant throat pain, difficulty swallowing, frequent cough and throat “gurgling”. The ED physician, Dr. John Corbin, M.D., suspected a post-surgical cervical hematoma and listed “cervical hematoma” on his differential diagnosis. The ER physician also ordered neck and chest x-rays. The neck x-rays showed extensive soft tissue swelling/hematoma that was compressing Ms. Williams’s tracheal air column. The x-rays also showed the trachea was deviated to the right of midline. The x-rays and the clinical findings strongly suggested an evolving cervical hematoma that was threatening Plaintiff’s airway. Dr. Corbin kept Ms. Williams in the ED for observation and administered IV fluids and morphine for the pain. At approximately 5:30 a.m., Dr. Corbin telephoned Dr. Westerlund to report the situation.

After talking with Dr. Corbin, at approximately 5:35 a.m. Dr. Westerlund ordered Plaintiff admitted to the ICU, noting her condition as “critical.” Dr. Westerlund also ordered a CT Scan of Ms. Williams’s neck to rule out a hematoma. The nursing staff failed to enter Dr. Westerlund’s order for a neck CT scan to be performed to rule out a hematoma. Dr. Westerlund failed to follow up on his order and confirm that the neck CT scan had been performed.

Dr. Westerlund claims he arrived at the hospital about 3 hours later, around 8:15 a.m., logged into the computer database where images are stored, and reviewed Ms. Williams’s x-rays. The electronic audit trails proves otherwise. In truth, Dr. Westerlund never reviewed Ms. Williams’s x-rays on October 20th as he claims.

Although admitted to the ICU at around 5:35 a.m. by Dr. Westerlund, Ms. Williams was not physically transported to the ICU until approximately 8:15 a.m. When Ms. Williams arrived

at the unit, ICU Nurse Patricia Duke performed an initial assessment and documented Ms. Williams's report of shortness of breath. Nurse Duke did not further assess Ms. Williams's report of respiratory distress.

After Ms. Williams had been in the ICU for several hours without seeing a doctor, a Nurse Duke and her supervisor, Nurse McIntosh, decided to call Dr. Westerlund on his cell phone to "make him aware" that Ms. Williams was in the ICU. At 9:48 a.m., Nurse Duke called Dr. Westerlund on his cell phone and reminded him that Plaintiff was in the ICU. Nurse Duke also testified that she informed Dr. Westerlund of Sandy's report of respiratory distress, testimony which Dr. Westerlund denies. At 10:00 a.m., Dr. Westerlund ordered another CT scan of Plaintiff's neck since, inexplicably, the first CT order was not carried out by the hospital staff. The CT scan was finally taken at 11:27 a.m., over 6 hours after it was first ordered. The CT was reviewed at 11:45 a.m. and showed a dramatically compressed and deviated airway in danger of pending collapse.

Dr. Dante Naraval, the on-site radiologist, reviewed Plaintiff's CT images and saw that Plaintiff's airway was compressed and deviated to the right, creating a life-threatening condition. Dr. Naraval immediately called the ICU and spoke with Nurse Duke directly to notify her that Plaintiff's airway was in danger.

The noon hour approached, and still no physician had seen Ms. Williams since she had been admitted to the ICU over 6 hours earlier.

Around 11:53 am, Nurse Duke called Dr. Westerlund to advise him that Ms. Williams's CT imaging had been completed, and there was concern the CT scan showed Plaintiff's airway could be in danger. Dr. Westerlund ordered a pulmonology consult to evaluate Sandy's airway.

The ICU charge nurse, Marie McIntosh, R.N., called pulmonologist Christopher Tidwell, M.D. who was seeing patients on the main floor of the hospital. About twenty minutes later, around 12:15 p.m., Dr. Tidwell arrived in the ICU and assessed Ms. Williams. He noted that she was alert, cooperative and breathing on her own, although with some discomfort. Dr. Tidwell looked at the monitoring equipment and saw that Ms. Williams had oxygen saturation levels near 100%, although she had noisy breathing sounds known as "stridor" and was in some respiratory distress. Dr. Tidwell noted Sandy's neck was swollen, and her pulse rate was elevated. According to the chart and the audit trail, Dr. Tidwell did not review the cervical CT and therefore did not appreciate the degree of tracheal compression or deviation.

Dr. Tidwell and Dr. Westerlund decided Plaintiff required immediate intubation.

Dr. Tidwell undertook to perform an "asleep" intubation and administered IV sedation to Ms. Williams. The medications impacted Ms. Williams's ventilator drive, making it even more difficult for her to intake enough oxygen. Dr. Tidwell then attempted the intubation, but due to the distorted and compressed airway caused by the large hematoma in her neck, Dr. Tidwell was unable to place the tube in Ms. Williams's airway.

Dr. Tidwell instructed a nurse to call the on-call anesthesiologist, Dr. Oehrlein, who was downtown finishing up a workout at the YMCA. Dr. Tidwell repeatedly attempted to intubate Ms. Williams, whose oxygen levels dipped into the 30% range.

As Dr. Tidwell tried to maneuver the breathing tube into Ms. Williams's airway, Dr. Westerlund opened her neck at bedside and scooped out hematoma with his fingers in an effort to decompress the airway.

About thirty minutes later, Dr. Oehrlein arrived and successfully performed the intubation. Ms. Williams did not awaken as expected, however, but instead lingered in a coma-

like state for approximately three weeks. As a result of being deprived of oxygen for extended periods of time, Ms. Williams suffered permanent and severe brain damage which has left her blind, disabled, and dependent on caregivers for nearly all activities of daily living.

Ms. Williams is seeking damages against defendants for past and future medical expenses, past and future lost wages, past and future general damages and expenses of litigation, including reasonable attorneys fees, pursuant to O.C.G.A. § 13-6-11.

7.

The following is the Defendants' brief and succinct outline of the case and contentions:

Tidwell Defendants:

Dr. Christopher Tidwell, who is Board Certified in Internal Medicine, Pulmonary Medicine, and Critical Care Medicine, was the on-call intensivist at St. Francis Hospital on October 20, 2012. Dr. Tidwell received a call at approximately noon that day from a nurse indicating that Dr. Westerlund was requesting a consult on a post-op patient in ICU due to a concern over her respiratory status. Dr. Tidwell was rounding on patients when he received the call, therefore, Tidwell asked if he was needed immediately or if he could come to the ICU when he finished with his patient. The nurse indicated that it was fine for him to finish with his patient before coming to the ICU. Dr. Tidwell then received a second call from a nurse indicating that he was needed in ICU urgently because the patient was getting worse. Tidwell responded by immediately going to the ICU to evaluate Mrs. Williams.

Once in the ICU, Dr. Tidwell examined Mrs. Williams, reviewed her chart and studied her CT scans. Dr. Tidwell noted that Ms. Williams was having difficulty breathing and was on the verge of a complete airway obstruction due to a hematoma and swelling causing compression

and a displaced trachea. Dr. Tidwell determined that Ms. Williams' airway needed to be protected on an emergent basis via intubation.

Since it was a Saturday, the OR was closed and the OR staff, including the on-call anesthesiologist, was not on-site. While the anesthesiologist, Dr. Oehrlein, was being paged and was in route, Drs. Tidwell and Westerlund agreed that immediate steps needed to be taken to protect Mrs. Williams' airway and that waiting to intubate the patient in the OR was not prudent. In order to maximize the chance of a successful intubation, Dr. Tidwell administered low doses of Versed and Etomidate to counteract the natural resistance to intubation and to allow for airway manipulation. Dr. Tidwell then attempted intubation with a laryngoscope. He was not able to successfully insert the endotracheal tube because the upper airway was obstructed by the hematoma and soft tissue swelling. The patient was then ventilated via Ambu Bag while Dr. Westurlund surgically evacuated the hematoma. Once the airway obstruction had been relieved by surgical decompression, Dr. Oehrlein was able to intubate the patient.

Dr. Tidwell contends that at all times during his care and treatment of Mrs. Williams he met, or exceeded, the standard of care and that no acts or omissions by Dr. Tidwell caused or contributed to the injuries claimed by Plaintiff.

NOTE: Defendants' outlines of the case are being written for the benefit of the Court. Defendants object to this outline of the case and contentions being read to the jury, as facts other than contained herein may become important during the trial of the case, depending upon the evidence presented during Plaintiff's case in chief. Should the Court wish to read an outline of the case to the jury, Defendants would like the opportunity to draft an outline for the jury that is tailored to the evidence presented at trial.

St. Francis:

Plaintiff Sandra Williams ("Ms. Williams") was admitted to St. Francis on October 17, 2012, to undergo an anterior cervical disc fusion ("ACDF"). The surgery was completed without incident, and Ms. Williams was discharged on the afternoon of October 18. In the early morning hours of October 20, Ms. Williams returned to the St. Francis Emergency Room with complaints of painful, difficult swallowing and a frequent cough. Upon arrival, Ms. Williams' cervical spine x-rays revealed a possible cervical hematoma. Shortly thereafter, she was transferred to the ICU by Dr. Westerlund for further observation. After spending several hours in the ICU and undergoing additional cervical studies, including a CT, and receiving continued observation, the decision was made to intubate Ms. Williams to protect her airway. Prior to the making the decision to intubate, Ms. Williams had not exhibited any signs of dyspnea, or difficulty breathing. The intubation procedure was difficult and resulted in several drops in oxygen saturations. While the intubation was eventually completed successfully, Plaintiffs have asserted that Ms. Williams suffered brain damage and blindness due to the combined negligence of the various doctors and nurses who provided treatment to Ms. Williams on October 18 and October 20.

The actions of each of St. Francis' employees and/or agents conformed to the appropriate standard of care. No act or omission for which St. Francis can be held liable caused any of Ms. Williams' alleged damages.

NOTE: Defendants' outlines of the case are being written for the benefit of the Court. Defendants object to this outline of the case and contentions being read to the jury, as facts other than contained herein may become important during the trial of the case, depending upon the evidence presented during Plaintiff's case in chief. Should the Court wish to read an outline of

the case to the jury, Defendants would like the opportunity to draft an outline for the jury that is tailored to the evidence presented at trial.

8.

The issues for determination by the jury are as follows:

For the Plaintiff:

- a. Ordinary (Professional) Negligence as to Dr. Westerlund, Dr. Tidwell, and St. Francis Hospital nursing staff;
- b. Causation;
- d. Damages;
- e. Expenses of litigation pursuant to O.C.G.A. § 13-6-11; and
- e. Apportionment amongst the Defendants.

By Defendants:

Defendants identify the following issues for trial:

For Tidwell Defendants:

(1) Whether or not the Plaintiff has carried her burden of proof by providing expert medical testimony sufficient to establish that Defendant Tidwell deviated from the standard of care practiced by physicians generally under like and similar conditions and circumstances during his care and treatment of Plaintiff Williams.

(2) If, in fact, Plaintiff establishes with expert testimony that Dr. Tidwell deviated from the standard of care, then whether or not the Plaintiff has carried her burden of proof of establishing that Defendant Tidwell's acts or omissions have been proven by expert testimony to be the proximate cause of any injury to Plaintiff, and

(3) Only if Plaintiffs carry the burden of proof by expert testimony establishing issues (1) and (2), what, if any, damages are to be recoverable by the Plaintiff against the Tidwell Defendants as determined by the enlightened conscience of a fair and impartial jury.

(4) Whether the care of each of the other named Defendants complied with the Standard of Care;

(5) Whether any negligent acts of any other named Defendant proximately caused an injury to Plaintiff; and

(6) The extent and apportionment of damages, if any, as determined by the enlightened conscience of a fair and impartial jury.

For St. Francis:

(1) Whether or not the Plaintiff has carried her burden of proof by providing expert medical testimony sufficient to establish that any St. Francis employee(s) deviated from the applicable standard of care during their care and treatment of Ms. Williams.

(2) If, in fact, Plaintiff establishes with expert testimony that any St. Francis employee(s) deviated from the standard of care, then whether or not the Plaintiff has carried her burden of proof of establishing that the acts or omissions of those St. Francis employee(s) have been proven by expert testimony to be the proximate cause of any injury to Plaintiff, and

(3) Only if Plaintiffs carry the burden of proof by expert testimony establishing issues (1) and (2), what, if any, damages are to be recoverable by the Plaintiff against St. Francis as determined by the enlightened conscience of a fair and impartial jury.

(4) Whether the care of each of the other named Defendants complied with the Standard of Care;

(5) Whether any negligent acts of any other named Defendant proximately caused an injury to Plaintiff; and

(6) The extent and apportionment of damages, if any, as determined by the enlightened conscience of a fair and impartial jury.

9.

Specifications of negligence including the applicable code sections are as follows:

(a) Plaintiff: Defendant St. Francis Hospital, Inc. failed to comply with the standard of care as follows:

With respect to St. Francis employee, Dr. Westerlund:

1. Failing to provide timely and appropriate care and treatment to Plaintiff to protect her airway after learning that Plaintiff had arrived in the St. Francis Emergency Department with a suspected cervical hematoma;
2. Failure to review cervical x-rays which showed tracheal deviation and compression, a life threatening condition;
3. Failure to follow up on neck CT order issued around 5:35 a.m.; and
4. Failing to properly prepare Plaintiff for intubation.

With respect to the St. Francis nursing staff:

1. Failure to timely report patient complaints of respiratory distress to attending physician;
2. Failure to advocate for Plaintiff when she remained in ICU for hours without being seen by a physician.
3. Failure to carry out Dr. Westerlund's 5:35 a.m. order for a neck CT to be performed to rule out hematoma.

With respect to Christopher K. Tidwell and his Professional Corporation:

1. Failing to properly assess and evaluate Plaintiff for intubation;
2. Failure to review CT images before attempting intubation; and
3. Negligently attempting asleep intubation in setting of occlusive cervical hematoma and stridor.

(b) For the Defendants:

For Tidwell Defendants:

The Defendants deny that any aspect of the Tidwell Defendants care and treatment of Plaintiff Williams was negligent. The only specifications of negligence against Dr. Tidwell are those set forth in the evidentiary deposition testimony of Plaintiffs' anesthesiology expert, Dr. Matthew Schlossberg, who is the only expert identified to offer standard of care opinions against Dr. Tidwell or Dr. Christopher K. Tidwell, M.D., P.C. The Tidwell Defendants object to any attempt by any party in the case to expand the issues beyond those set forth in Dr. Schlossberg's evidentiary deposition testimony and the Plaintiff's specifications of negligence herein.

For St. Francis:

St. Francis denies that any aspect of St. Francis' care and treatment of Ms. Williams was negligent.

10.

If the case is based on a contract, either oral or written, the terms of the contract are as follows (or, contract is attached as an Exhibit to this Order):

This case is not based on contract.

11.

The types of damages and the applicable measure of those damages are stated as follows:

For the Plaintiff:

1. Past General Damages: General damages constituting just compensation for Plaintiff's pain and suffering from October 20, 2012 until the time of trial, pursuant to O.C.G.A. § 51-12-4.
2. Past Expenses: Special damages constituting reimbursement for medical, hospital, lost wages and other related expenses from October 20, 2012 until the time of trial pursuant to O.C.G.A. § 51-12-7. The measure of these damages is the amount of expenses and lost wages incurred as a result of the injury, disease or disability as proven in any manner to permit calculation of the amount with reasonable certainty. *Whitley v. Ditta*, 209 Ga. App. 553 (1993). *See also* O.C.G.A. §§ 51-12-2, 51-12-3 and 51-12-13.
3. Future General Damages: General damages constituting just compensation for Plaintiff's pain and suffering from the date of trial throughout the remainder of her life pursuant to O.C.G.A. § 51-12-4; *Baxter v. Bryan*, 122 Ga. App. 817 (1970). The measure of such damage is the enlightened conscience of fair and impartial jurors.
4. Future Expenses: Special damages constituting just compensation for future medical expenses and future lost wages for Plaintiff throughout the remainder of her life, pursuant to O.C.G. A. § 51-12-7. The measure of these damages is the reasonable value of such expenses as are reasonably necessary.
5. Expenses of litigation, including reasonable attorneys fees, pursuant to

O.C.G.A. § 13-6-11

By Defendants:

For Tidwell Defendants:

These Defendants deny that they are liable in any amount to Plaintiffs and deny that Plaintiffs are entitled to any damages whatsoever.

For St. Francis:

These Defendants deny that they are liable in any amount to Plaintiffs and deny that Plaintiffs are entitled to any damages whatsoever.

12.

If the case involves divorce, each party shall present to the Court at the pre-trial conference the affidavits required by Rule 24.2:

Not applicable.

13.

The following facts are stipulated:

For St. Francis:

St. Francis reserves the right to supplement this Paragraph to the extent necessary upon reasonable notice to and / or agreement of counsel.

14.

The following is a list of all documentary and physical evidence that will be tendered at the trial by the parties. Unless otherwise noted, the parties have stipulated as to the authenticity of the documents listed and the exhibits listed may be admitted without further proof of authenticity. All exhibits shall be marked by counsel, and copies provided to opposing counsel, prior to trial so as not to delay the trial before the jury.

By the Plaintiff: See attached exhibit list attached to this Order as Exhibit A. Plaintiffs reserve the right to amend and/or supplement this list of documentary evidence and physical evidence upon giving reasonable advance notice prior to trial of such additional evidence to opposing counsel.

a) By Defendants:

(a) For Tidwell Defendants:

The following is a list of all documentary and physical evidence that may be tendered at the trial by Defendants. The parties have not yet stipulated as to the authenticity of the documents listed. Defendants reserve all objections, including objections to authenticity, but anticipate being able to stipulate to the authenticity of most if not all of the anticipate exhibits. All exhibits shall be marked by counsel prior to trial so as not to delay the trial before the jury.

1. Records of Blue Cross Blue Shield of Georgia.
2. Dr. John Corbin's cell phone records produced in discovery.
3. Dr. John Corbin's records and documents produced.
4. Records of Horizons Diagnostics/Dr. Michael Sims.
5. Plaintiff Sandra Williams' Income/Wage Information, including from Synovus and Columbus Consolidated Government..
6. John B. Amos Cancer Center records.
7. Lane Dermatology records.
8. Dr. George Lipscomb, Dr. Dante Naraval and Radiology Associates records and documents produced in discovery.
9. MyCare Pharmacy records.
10. Wright Rehabilitation Services/Leslie Wright records including, but not limited to, the life care plans prepared for Plaintiff and all documents used to prepare and substantiate the life care plans.

11. Emory Eye Center, LLC/Dr. Jason Peragallo records.
12. West Georgia Eye Care Center records.
13. Piedmont Hospital records.
14. Regional OB/GYN records.
15. Regional Rehabilitation Hospital records.
16. Shepherd Center records.
17. St. Francis Center for Surgical Care/Dr. Charles Scarbrough records.
18. St. Francis Spine Center records.
19. St. Francis Spine Center answering service messages on 10/20/12 (EW000047-51)(and Certification from Voice Link of Columbus, Inc.)
20. Dr. Christopher Tidwell's 10/20/12 Verizon cell phone records for (706) 536-4214 (and Certification from Verizon).
21. Dr. Christopher Tidwell's patient chart (20 pgs.) (Ex. 2 to his depo.).
22. Dr. Eric Westerlund's text message to Dr. Walsh on 10/20/12 (EW000046).
23. Dr. Eric Westerlund's Verizon cell phone records for 10/20/12 for 760 419- 2190 (EW00045).
24. Dr. Thomas Walsh records and documents produced in discovery.
25. Dr. Thomas Walsh office notes (Ex. 35 to his depo.).
26. Dr. Thomas Walsh Verizon cell phone records for 10/19/12 and 10/20/12 for (706) 587-2428 (and Certification from Verizon).
27. Billing records from all health care providers.
28. Medical records and documents produced by St. Francis Hospital including, but not limited to:
 - HPF Audit Trail Encounter Report
 - PACS Audit Trail documents
 - Policies and Procedures
 - MedHost documents
 - Records of the care and treatment provided to Plaintiff by physicians, nurses and other medical providers.

29. Dr. John Lee's records.
30. Columbus Speech & Hearing Center records.
31. All x-rays, CTs or other imaging studies and reports performed on Plaintiff while at St. Francis Hospital between October 17, 2012 and November 16, 2012.
32. Documents produced by Plaintiff in discovery, including photograph and video footage of Plaintiff Sandra Williams.
33. Notes of Ricki Ann Reeves (Ex. 2 to her depo. on 3/15/16).
34. All documents produced by Dr. Westerlund.
35. Notes/diary of Phillip Williams produced by Zachary Williams' at Zachary's deposition.
36. C.V.s of Dr. Christopher K. Tidwell, Dr. Jesse Hall, Dr. James Bridges, Dr. Andrew Cichelli;
37. Jagdish Sidhpura, M.D. records
38. Midtown Medical Center
39. Buckhead ENT.
40. Any and all documents, including responses, produced by Plaintiff in discovery; and,
41. Any and all exhibits to depositions taken in this case,
42. Any and all documents and evidence listed by any other party in their portion of the Consolidated Pre-trial Order.

Impeachment materials, including medical records, medical literature and other statements or testimony, may be used as permitted by law without being listed.

Tidwell Defendants reserve the right to use posters/enlargements, Powerpoint/multi-media presentations, supporting literature, medical illustrations, or exhibits of calculations for demonstrative purposes although not specifically identified above. These last items will not be tendered into evidence.

Tidwell Defendants may add exhibits upon notice to the opposing counsel prior to trial.

Tidwell Defendants reserve the right to object to the proposed documentary and/or physical evidence to be presented by the Plaintiff and other counsel until defense counsel has the opportunity to examine the same and until the same have been properly tendered.

For St. Francis:

The following is a list of all documentary and physical evidence that may be tendered at the trial by Defendants. The parties have not yet stipulated as to the authenticity of the documents listed. Defendants reserve all objections, including objections to authenticity, but anticipate being able to stipulate to the authenticity of most if not all of the anticipate exhibits. All exhibits shall be marked by counsel prior to trial so as not to delay the trial before the jury.

1. Certified Medical Records and any and all radiological films of Sandra Williams maintained by the following providers:
 - a) St. Francis Hospital
 - b) St. Francis Spine Center
 - c) The Shepherd Center
 - d) The Shepherd Center Pathways
 - e) Regional Rehabilitation Hospital
 - f) Piedmont Hospital
 - g) Horizon Diagnostics/Dr. Michael Sims
 - h) West Georgia Eye Care Center/Dr. Stephen Beaty
 - i) Emory Eye Center/Jason Peragallo, M.D.
 - j) The Emory Clinic
 - k) Midtown Medical Center
 - l) Columbus Foot & Ankle
 - m) My Care Pharmacy
 - n) Lane Dermatology
 - o) Keith M. Dockery, M.D./Buckhead ENT
 - p) Regional Obstetrics & Gynecology
 - q) John B. Amos Cancer Center
 - r) Mid-Georgia Ambulance

2. Radiology records from St. Francis Hospital;
3. Imaging from St. Francis Hospital;
4. PACS Audit Trail records for Sandra Williams from St. Francis Hospital;
5. PACS Audit Trail records from St. Francis Hospital for Dr. Erik Westerlund;
6. Curriculum vitae of L. Erik Westerlund, M.D.;
7. Licensure/certificates/CME documents of L. Erik Westerlund, M.D.;
8. Curriculum vitae of John DeVine, M.D.;
9. Curriculum vitae of Christopher Brown, M.D.;
10. Complaint;
11. Affidavit of Kalman Blumberg, M.D.;
12. Plaintiffs' Responses to Defendant Walsh's First Continuing Interrogatories and Request for Production of Documents (December 23, 2014);
13. Plaintiffs' Responses to Defendant Christopher Tidwell, M.D.'s First Continuing Interrogatories to Plaintiffs, with Verification (December 29, 2014);
14. Plaintiffs' Responses to Defendant Christopher Tidwell, M.D.'s First Continuing Requests for Production to Plaintiffs (December 29, 2014);
15. Plaintiffs' Responses to Defendant John Corbin, M.D.'s First Continuing Interrogatories, with Verification (December 29, 2014);
16. Plaintiffs' Responses to Defendant John Corbin, M.D.'s First Continuing Request for Production of Documents (December 29, 2014);
17. Plaintiffs' Responses to Defendant L. Erik Westerlund, M.D.'s First Continuing Interrogatories and First Requests for Production to Plaintiffs, with Verification (January 12, 2015);

18. Plaintiffs' Responses to Defendant Franklin Killingsworth, P.A.'s First Interrogatories and Requests for Production to Plaintiffs, with Verification (March 6, 2015);
19. Plaintiffs' Responses to Defendants St. Francis Hospital, Inc., Brenda Polk, RN, Caroline Lukano, RN, Marie McIntosh, RN, and Patricia Duke, RN's First Interrogatories and Requests for Production to Plaintiffs, with Verification (March 6, 2015);
20. Plaintiffs' First Supplemental Responses to Defendant Franklin Killingsworth, P.A.'s First Interrogatories and Requests for Production to Plaintiffs, with Verification (October 22, 2015);
21. Plaintiffs' First Supplemental Responses to St. Francis Hospital, Inc.'s First Interrogatories and Requests for Production to Plaintiffs, with Verification (October 22, 2015);
22. Plaintiffs' First Supplemental Responses to Defendant L. Erik Westerlund, M.D.'s First Continuing Interrogatories and First Requests for Production to Plaintiffs, with Verification (October 22, 2015);
23. Plaintiffs' First Supplemental Responses to Defendant Walsh's First Continuing Interrogatories and Request for Production of Documents (October 22, 2015);
24. Any medical literature or guidelines referenced or relied upon by any witness or expert in this case;
25. Billing material relating to Plaintiffs' experts;
26. Advertising/marketing material relating to Plaintiffs' experts;
27. Illustrations/diagrams (potentially among others):
 - Anatomy of the head and neck;
 - Anterior cervical discectomy and fusion ("ACDF") surgery;

– Cervical swelling and/or hematoma following ACDF surgery;

-- Intubation;

28. Any document produced by any party or third party in this case;

29. Dr. Eric Westerlund's text message to Dr. Walsh on 10/20/12 (EW000046);

30. Dr. Eric Westerlund's Verizon cell phone records for 10/20/12 for 760 419- 2190
(EW00045);

31. Any document identified in discovery in this case;

32. All pleadings and affidavits filed and discovery/discovery documents served in this case,
including Plaintiffs' responses to any defendant's discovery and supplemental discovery
by letter/email and/or pleading;

33. Any materials contained in the files of Plaintiff's experts in this case;

34. Any material authored/edited by experts of Plaintiff in this case;

35. Any materials provided to plaintiff's experts in this case;

36. Medical literature authored/edited by experts of either Plaintiff or defendants or
referenced in the depositions in this case;

37. Any evidence necessary to rebut any testimony presented by Plaintiffs or to illustrate any
contention of Defendants;

38. All deposition exhibits from this case;

39. All exhibits and documents identified by the Plaintiffs in this case;

40. Any documents listed by Plaintiffs; and

41. Documents received in response to any trial Notice to Produce.

Impeachment materials, including medical records, medical literature and other
statements or testimony, may be used as permitted by law without being listed.

St. Francis reserves the right to use posters/enlargements, Powerpoint/multi-media presentations, supporting literature, medical illustrations, or exhibits of calculations for demonstrative purposes although not specifically identified above.

St. Francis reserves the right to object to any proposed documentary and/or physical evidence to be presented until they have had an opportunity to examine the same and until a proper foundation has been laid and the same has been properly tendered.

The parties shall be permitted to supplement this list before trial with any document previously disclosed in discovery, provided notice is given to the other party. The parties shall be permitted to supplement this list prior to trial with additional, previously undisclosed documents by agreement of the parties or upon Order of this Court

The parties reserve the right to amend this list of documentary and physical evidence by giving at least five (5) days notice prior to trial of any such documentary and physical evidence to opposing counsel.

15.

Special authorities relied upon by the Plaintiffs relating to peculiar evidentiary or other legal questions are as follows:

Plaintiff reserves the right to provide the Court with additional motions or trial briefs as necessitated by pre-trial activities, and authorities and briefs on issues that may arise before or during the trial.

16.

Special authorities relied upon by Defendant relating to peculiar evidentiary or other legal questions are as follows:

For Tidwell Defendants:

These Defendants rely on any authority for evidentiary and legal questions as set forth in forthcoming Motions in Limine, objections to expert testimony, proposed jury charges, pretrial motions and trial briefs. These Defendants reserve the right to file additional motions in limine, bench briefs or other pleadings addressing evidentiary and/or legal issues as they arise prior to or during trial.

For St. Francis:

These Defendants rely on any authority for evidentiary and legal questions as set forth in forthcoming Motions in Limine, objections to expert testimony, proposed jury charges, pretrial motions and trial briefs. These Defendants reserve the right to file additional motions in limine, bench briefs or other pleadings addressing evidentiary and/or legal issues as they arise prior to or during trial.

17.

All requests to charge anticipated at the time of trial will be filed in accordance with Rule 10.3. or as otherwise directed by the Court.

18.

The testimony of the following persons may be introduced by deposition:

For the Plaintiff: Any medical providers listed in Section 14 above as well as any witness listed in paragraph 19(a) or (b) who becomes unavailable to attend trial in person. Depositions (or portions thereof) of all live witnesses may be introduced for purposes of impeachment. Any objection to the depositions or questions or arguments in the depositions shall be called to the attention of the Court prior to the trial. Plaintiffs object to the Defendants' introduction of testimony by deposition absent a showing of unavailability. Any objections to the depositions or

questions or arguments in the depositions shall be called to the attention of the Court prior to trial.

By Defendants:

For Tidwell Defendants:

Deborah Hudson, Dante C. Naraval, M.D. and/or the deposition of additional witnesses Defendants seek to call who is determined to be unavailable or as allowable in the discretion of the Court. Because Defendants are by law and by definition in a responsive position, Defendants reserve the right to amend in its entirety the list of depositions they may seek to introduce at trial upon receipt of a list of such depositions from the other parties.

With respect to any deposition that the Court may deem admissible, the Court will need to address various objections in each of the depositions if counsel cannot agree. Any objections to the depositions or questions or arguments in the depositions shall be called to the attention of the Court prior to trial.

For St. Francis:

St. Francis will present Mr. Williams by deposition. Defendants reserve the right to introduce depositions of any witness if the witness is deemed unavailable under the Georgia Civil Practice Act or the trial court otherwise permits such use.

St. Francis objects to the use of deposition testimony of any witness that is available to appear and testify at trial or who is subject to being compelled to appear and testify at trial.

No later than three (3) days before trial, the parties shall designate by page and line number the deposition testimony that they intend to present to the jury, if any, so that the opposing party can interpose any objections and designate additional testimony to be read under

the rule of completeness. Any objection to the deposition designations or the questions or arguments in the depositions designated shall be called to the attention of the Court prior to trial.

The Parties reserve the right to supplement this list upon notice to opposing counsel at least five (5) days prior to trial.

19.

For the Plaintiff:

The following are a list of witnesses that:

a. Plaintiff will have present at trial: Sandra Williams

b. Plaintiff may have present at trial:

1. Phillip Williams;
2. Jacob Williams;
3. Zachary Williams;
4. RickiAnne Reeves;
5. Deborah Hudson;
6. Nancy Moore;
7. Nannett Williams;
8. Kristen Williams;
9. Christal Woodham;
10. Samantha Allen
11. Jerry Williams;
12. Zack Allen;
13. Kathy Gunnels;
14. Kathy Jones;
15. Joyce Kidd;
16. Stacy Glover;
17. Mary Gunn;
18. Judy Fletcher;
19. Ted Baskin;

20. Teresa Wilson Lamb;
21. Rev. Jerry Speer;
22. Kalman Blumberg, MD;
23. Judith Climenson, RN;
24. Matthew Schlossberg, MD;
25. Leslie Wright;
26. Bruce Seaman, PhD;
27. Judy Baskin;
28. John Corbin, MD;
29. Patricia Duke, RN;
30. Charlene Fogt;
31. Kim Foster;
32. Franklin Killingsworth, PA;
33. George Lipscomb, MD;
34. Caroline Lukano, RN;
35. Marie McIntosh, RN;
36. David Moore;
37. Dante Naraval, MD;
38. Frederick Oehrlein, MD;
39. John Perry;
40. Brenda Polk, RN;
41. Yu Kent Rebekahsung;
42. Rebecca Simms;
43. Christopher Tidwell, MD;
44. Thomas Walsh, MD;
45. L. Erik Westerlund, MD;
46. Stephen Beatty, MD;
47. Angela Beninga, DO;
48. Keith Dockery, MD;
49. Payal Fadia, M.D.
50. John Lee, MD;

51. Jason Peragallo, MD;
52. Paypal Fadia, MD;
53. Jagdish Sidhpura, MD;
54. Michael Sims, MD;
55. Andrew Zadoff, M.D.
56. James Bridges, DO;
57. Christopher Brown, MD
58. Andrew Cichelli, MD;
59. John DeVine, MD
60. Stephane Fine, RN;
61. Jesse Hall, MD;
62. Angie King
63. Lloyd N. Bell (for the limited purpose of introducing evidence of expenses of litigation);
64. Any healthcare provider not otherwise listed above who is identified in any medical records set forth in Paragraph 14 above;
65. Any witness listed by either Defendant in their portion of the Pre-trial Order;
66. Any witness necessary for purposes of record authentication and/or foundational requirements;
67. Any rebuttal witnesses; and
68. Any persons mentioned in deposition or during discovery.

Plaintiff reserve the right to amend and supplement the foregoing list of potential witnesses upon reasonable notice so as not to constitute an unjust surprise or impose undue delay upon the trial of the case.

Plaintiff reserves the right to call other witnesses for the purposes of impeachment or rebuttal.

By Defendants:

The following are a list of witnesses the

For Tidwell Defendants:

a. Will have present at trial:

Defendant – Christopher K. Tidwell, M.D.

b. May have present at trial:

Bailey, Jamie

Baskin, Judy

Baskin, Ted

Beatty, Stephen, MD

Beninga, Angela, D.O.

Blumberg, Dr. Kalman

Bridges, Gary, MD

Brown, Christopher, MD

Cannon, Brett, MD

Cichelli, Andrew, MD

Climenson, Judith, RN

Cone, Terry, MD

Corbin, John, MD

DeVine, John, MD

Dockery, Keith, MD

Duke, Patricia, RN

Fadia, Payal, MD

Fine, Stefanie, RN
Fogt, Charlene, RN
Foster, Kim
Fussell, JoAnn
Gunnels, Sandra
Hall, Jesse, MD
Hudson, Debbie
Johnson, Jerri, RN
Kent, Rebekahsung Yu
Kidd, Joyce
Killingsworth, Frank W., PA
King, Angie
Lipscomb, George, MD
Lukano, Caroline, RN
Mancuso, Anthony, MD
McArdle, Christopher
McIntosh, Marie, RN
Moore, David
Moore, Nancy
Mulliken, Robert A., MD
Murray, Herndon, MD
Naraval, David, MD
Oehrlein, Frederick, MD

Peragallo, Jason, MD

Perry, John

Polk, Brenda, RN

Reeves, Ricky Anne

Schlossberg, Matthew L., MD

Sidhpura, Jagdish, MD

Seaman, Bruce, Phd.

Sims, Michael. M.D.

Sims, Rebecca

Speer, Jerry, Rev.

Tidwell, Christopher, MD

Walsh, Thomas R., MD

Weller, D-Ann, RN

Westerlund, Erik, MD

Williams, Jacob

Williams, Nannett

Williams, Sandra

Williams, Phillip

Williams, Zachary

Wright, Leslie

Zadoff, Andrew, MD

Any treating physician or other healthcare provider found in the records of Plaintiff Williams.

Any witness listed on any other parties' may call or will call list.

For St. Francis:

- a. Will have present at trial: None.
- b. May have present at trial:
 - 1) Erik Westerlund, M.D.;
 - 2) Thomas R. Walsh, M.D.;
 - 3) Franklin Wells Killingsworth, P.A.;
 - 4) George E. Lipscomb, M.D.;
 - 5) John R. Corbin, M.D.;
 - 6) Sandra Williams;
 - 7) John DeVine, M.D.;
 - 8) Christopher Brown, M.D.;
 - 9) Brett Cannon, M.D.;
 - 10) Stephanie Fine, RN;
 - 11) D-Ann Marie Weller, MSN, CRNP, FNP;
 - 12) James Bridges, D.O.;
 - 13) Andrew Cichelli, M.D.;
 - 14) Jesse Hall, M.D.;
 - 15) Brenda Polk, RN;
 - 16) Terry Cone, M.D.;
 - 17) Caroline Lukano, RN;
 - 18) Christopher McArdle, M.D.;
 - 19) Michael Hagues, M.D.
 - 20) Margaret Vega-Jones;

- 21) Raemona Allen;
- 22) Sarah Gay;
- 23) Dana Cato;
- 24) Angela King;
- 25) Jennifer Hardrick;
- 26) Frederick Roberts;
- 27) Donna Davis;
- 28) Barbara Powell;
- 29) Keith Owen, RN;
- 30) Gabriele Seldon, RN;
- 31) Ashley Thomas, RN;
- 32) Adam Moody;
- 33) Robert Graham Weatherstone, M.D.;
- 34) Patricia Duke, RN;
- 35) Marie McIntosh, RN;
- 36) Judy Baskin, RN;
- 37) Natashi Little;
- 38) Dante Naraval, M.D.;
- 39) John Perry;
- 40) Sandra Gunnels;
- 41) Frederick Oehrlein, M.D.;
- 42) Jaimie Bailey, RT;
- 43) Jerri Johnson, RN;

- 44) Charlene Fogt, RN;
- 45) Kimberly Foster;
- 46) Brian White;
- 47) William E. Adams, M.D.;
- 48) Keith Dockery, M.D.;
- 49) Michael Sims, M.D.;
- 50) Stephen Beaty, M.D.;
- 51) Jason Peragallo, M.D.;
- 52) Jagdish Sidhpura, M.D.
- 53) Angela Beninga, M.D.;
- 54) Andrew Zadoff, M.D.;
- 55) Payal Fadia, M.D.;
- 56) Herndon Murray, M.D.;
- 57) Deborah Hudson;
- 58) Ricki Anne Reeves;
- 59) Jacob Williams;
- 60) Zachary Williams;
- 61) Sierra Williams;
- 62) Nannette Williams;
- 63) Nancy Moore;
- 64) Joyce Kidd;
- 65) Jerry Speers;
- 66) Stacy Glover;

- 67) Mary Gunn;
- 68) Judy Fletcher;
- 69) Ted Baskin;
- 70) Rebecca Sims;
- 71) Angie King;
- 72) Sandra Phillips;
- 73) Jeanie Adams;
- 74) Kevin Ammar, M.D.;
- 75) James Lindley, M.D.;
- 76) Any person deposed in this lawsuit;
- 77) Any person required for rebuttal;
- 78) Medical records custodians, if necessary;
- 79) Any person designated by any medical provider to authenticate their medical records;
- 80) Any person designated by any entity to authenticate their records;
- 81) Any medical provider or other person identified in Sandra Williams' medical records; and
- 82) Any person listed on Plaintiffs' "will call" and "may call" lists.

St. Francis objects to any witness listed by Plaintiffs who was not previously identified in a timely fashion during the course of discovery.

Opposing counsel may rely on representation that the designated party will have a witness present unless notice to the contrary is given in sufficient time prior to trial to allow the other party to subpoena the witness or obtain their testimony by other means.

The form of all possible verdicts to be considered by the jury are as follows:

For the Plaintiff:

VERDICT

CHECK ALL THAT APPLY

1. We the jury, hereby find in favor of Plaintiff Sandra Williams and against the following Defendants, as follows:

St. Francis Hospital, Inc.

Christopher K. Tidwell, MD and Christopher K. Tidwell, MD, P.C.

OR

We, the jury, find for the Defendants.

If you have found in favor of the Plaintiffs against any of the Defendants, please proceed to subpart 2.

2. We, the jury, award the following damages:

a. Past Medical Expenses in the amount of \$_____.

b. Future Medical Expenses in the amount of \$_____.

c. Past Lost Wages in the amount of \$_____.

d. Future Lost Wages in the amount of \$_____.

e. Past Pain and Suffering in the amount of \$_____.

f. Future Pain and Suffering in the amount of \$_____.

3. We, the jury, find that Defendant(s) have been stubbornly litigious and/or have caused Plaintiff unnecessary trouble and expense, and award expenses of litigation to Plaintiff in the amount of \$_____.

OR

4. [] We, the jury, find that Defendant(s) have not been stubbornly litigious or have caused Plaintiff unnecessary trouble and expense.

This ____ date of December, 2017.

Foreperson

By Defendants:

For Tidwell Defendants:

Tidwell Defendants object to the verdict form proposed by Plaintiff as being in violation of O.C.G.A. Section 51-12-33(d)(1). These Defendants will supplement a proposed verdict form to the Court.

For St. Francis:

St. Francis will submit a verdict form to the Court prior to the submission of the case to the jury.

21.

- (a) The possibilities of settling the case are poor.
- (b) The parties do want the case reported.
- (c) The costs of takedown will be paid equally by the parties.
- (d) Other matters at this time.

For the Tidwell Defendants:

Tidwell Defendants propose that the parties agree to inform the other parties of the witnesses expected to be called the next day for planning purposes and to keep the trial moving.

It is proposed by Tidwell Defendants that copies of depositions taken in this proceeding may be used (for impeachment purposes) in lieu of the opening of the

original deposition from the Clerk's files with due consideration given to any errata sheets submitted with reference thereto.

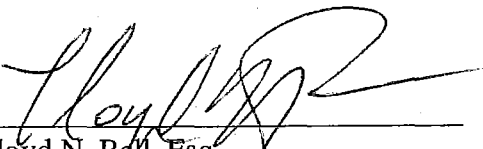
For St. Francis:

The case will be tried to a jury of (12) with two (2) alternates.

The Court understands that there are various witnesses, including physicians and others, who are under subpoena or who will be subpoenaed to testify at the trial of this case. Counsel are authorized by this Court to have any such witnesses which they have caused to be served with a subpoena, to be available to testify on reasonable notice, rather than to appear at the call of this case. This reasonable notice rule is designed to accommodate the witnesses, counsel, and the Court and does not affect the validity of any such subpoena served or to be served in this case.

- e. Tidwell Defendants invoke the Rule of Sequestration.
- f. The parties request that written jury charges be submitted to the jury to consider during deliberations. Such action is proper and appropriate, and is within the trial court's discretion to allow it. Parker v. State, 282 Ga. 897 (2008); Fletcher v. State, 277 Ga. 795 (2004).

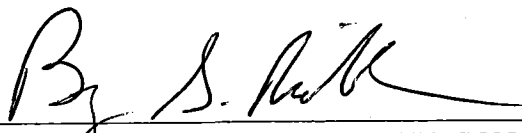
This 19th day of October, 2017.

 <hr/> <p>Lloyd N. Bell, Esq. Georgia Bar No. 048800 BELL LAW FIRM 1201 Peachtree St. N.E., Suite 2000 Atlanta, GA 30361</p>	<hr/> <p>Paul E. Weathington, Esq. Tracy Baker, Esq. WEATHINGTON MCGREW, PC 191 Peachtree St., NE, Suite 3900 Atlanta, GA 30303</p>
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	<hr/> <p>Roger Sumrall, Esq. Bendin Sumrall & Ladner, LLP One Midtown Plaza, Suite 800 1360 Peachtree Street, NE Atlanta, GA 30309 rsumrall@bsllaw.net</p> <p><i>Attorney for Defendant St. Francis Hospital, Inc.</i></p>

It is hereby ordered that the foregoing, including the attachments thereto, constitutes the PRE-TRIAL ORDER in the above case and supersedes the pleadings, which may not be further amended except by order of the court to prevent manifest injustice.

IT IS SO ORDERED, this the 15th day of November, 2017.



HONORABLE BENJAMIN S. RICHARDSON
Judge, State Court of Muscogee County

EXHIBIT A – PLAINTIFF’S LIST OF TRIAL EXHIBITS

The following is a list of all documentary and physical evidence that may be tendered at the trial by the Plaintiff. Counsel reserves the right to revise the order of these exhibits prior to trial:

1.	<p>Sandra Williams’s Certified Medical Records:</p> <ul style="list-style-type: none"> St. Francis Hospital and St Francis Spine Center The Shepherd Center Buckhead ENT Columbus Foot & Ankle Columbus Regional Health System/Midtown Medical Center Columbus Speech & Hearing Emory Eye Clinic Horizon Dignostics Joshua Lane, MD Mid Georgia Ambulance Piedmont Hospital Regional Obstetrics & Gynecology Regional Rehabilitation Hospital Jagdish Sihpura, MD St. Francis Center for Surgical Care West Georgia Eye Care
2.	Sandra Williams Radiology & Imaging Films from St Francis Hospital;
3.	St. Francis Hospital’s Policies and Procedures;
4.	St. Francis Hospital Standard of Practice;
5.	St. Francis Hospital MEDHOST audit log for Sandra Williams;
6.	St. Francis Hospital HPF Audit Trail by Encounter report for Sandra Williams for 10/17/2012 admission;
7.	St. Francis Hospital HPF Audit Trail by Encounter report for Sandra Williams for 10/20/2012 admission;

8.	St. Francis Hospital PACS – Patient Record Access Report for 10/17/2012 admission;
9.	St. Francis Hospital PACS – Patient Record Access Report for 10/20/2012 admission;
10.	St. Francis Hospital McKession report for Sandra Williams 10/17/2012 admission;
11.	St. Francis Hospital McKession report for Sandra Williams 10/20/2012 admission;
12.	Spreadsheet for PACS workstations at St. Francis Hospital;
13.	Screenshot of PACS terminal;
14.	St. Francis Hospital PACS audit trails for Dr. Westerlund on 10/19-20/2012;
15.	John Corbin’s cell phone records;
16.	John Corbin’s work calendar for October 2012;
17.	Christopher Tidwell’s cell phone records;
18.	Christopher Tidwell’s Curriculum Vitae;
19.	Christopher Tidwell’s chart
20.	Thomas Walsh’s cell phone records;
21.	Erik Westerlund, MD’s cell phone records;
22.	Erik Westerlund, MD’s text message;
23.	Erik Westerlund, MD’s voice link call log for 10/19-20/2012;
24.	Erik Westerlund, MD’s employment contract with St. Francis Hospital;
25.	Erik Westerlund, MD’s Curriculum Vitae ;
26.	Kalman Blumberg, M.D.’s Curriculum Vitae;
27.	Kalman Blumberg, MD’s Affidavit;

28.	Judith Climenson, RN's Curriculum Vitae;
29.	Judith Climenson's Affidavit;
30.	Matthew Schlossberg, MD's Curriculum Vitae;
31.	Matthew Schlossberg, MD's Affidavit;
32.	Leslie Wright's Curriculum Vitae;
33a	Life Care Plan;
33b.	Life Care Plan -Expenditures & Costs;
34.	Chart of Sandra William's Medical Expenses with supporting documentation;
35.	Sandra William's employment file from Columbus Consolidated Government;
36.	Sandra William's employment file from Synovus;
37.	Sandra Williams' W2s;
38.	RickiAnn Reeves notes;
39.	Phillip Williams Journal;
40.	Videos and Photographs of Sandra Williams;
41.	Photographs of Sandra Williams with family & friends;
42.	Notice of Award of Disability Benefits;
43.	National Vital Statistics Report, CDC Vol. 64, No. 11, November 22, 2015;
44.	Medical animation, illustrations and other visual aids;
45.	Exemplars for medical treatment and/or procedures;
46.	Medical articles;
47.	Any and all exhibits to depositions taken in this case subject to foundation objections;
48.	Photographs, videotapes, DVDs, CDs, illustrations and diagrams for medical and illustrative purposes;

49.	Photographs, videotapes, DVDs, CDs, illustrations and diagrams for purposes of rebuttal and or impeachment;
50.	Any and all CVs produced by any expert or physician;
51.	BLF Fee Agreement with Sandra Williams;
52.	Any document produced by Defendants in the course of discovery;
53.	Any document produced by Plaintiffs in the course of discovery;
54.	Any document produced by Thomas Walsh, MD, Franklin Killingsworth, PA, Erik Westerlund, MD, George Lipscomb, MD, Dante Naraval, MD and John Corbin, MD in the course of discovery;
55.	All pleadings and discovery on file at time of trial;
56.	Any exhibits to any motions filed in this case;
57.	Any and all documents and/or evidence identified or tendered by Defendants;
58.	Any document produced by a party or non-party during the course of discovery;
59.	Any pleading, deposition and/or document for the purpose of impeachment.