

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----x  
MARIA LEONOR QUEZADA,

Plaintiff,

-against-

Index No.  
707315/2018

CJ TAN SPRING LLC, KENDRA SCOTT DESIGN, INC.,  
KENDRA SCOTT, LLC, and JA CARPENTRY INC d/b/a JAC,

Defendants.

-----x  
JAMES AGRESTA CARPENTRY INC., D/B/A JA  
CARPENTRY INC. i/s/h/a JA CARPENTRY INC. D/B/A  
JAC,

Third-Party Plaintiffs,

-against-

PRECISE SERVICES CORP.,

Third-Party Defendant.

-----x  
KENDRA SCOTT DESIGN, INC., KENDRA SCOTT, LLC,

Second Third-Party Plaintiff,

-against-

PRECISE SERVICES CORP.,

Second Third-Party Defendant.

-----x  
November 4, 2025  
2:13 p.m.

(Caption continued on the next page.)

- (1)
- (2)
- (3)
- (4)
- (5)
- (6)
- (7)
- (8)
- (9)
- (10)
- (11)
- (12)
- (13)
- (14)
- (15)
- (16)
- (17)
- (18)
- (19)
- (20)
- (21)
- (22)
- (23)
- (24)
- (25)

DEPOSITION VIA VIDEOCONFERENCE of  
Nonparty Witness, ANDREW MEROLA, M.D., pursuant to  
Subpoena, before Randi Vecchione, a Notary Public  
within and for the State of New York.

- (1)
- (2)
- (3)
- (4)
- (5)
- (6)
- (7)
- (8)
- (9)
- (10)
- (11)
- (12)
- (13)
- (14)
- (15)
- (16)
- (17)
- (18)
- (19)
- (20)
- (21)
- (22)
- (23)
- (24)
- (25)

**A P P E A R A N C E S :**

BADER & YAKAITIS LLP  
Attorneys for Plaintiff  
1430 Broadway, Suite 1802  
New York, New York 10018

BY: ALEXANDER YAKAITIS, ESQ.

AHMUTY, DEMERS & McMANUS, ESQS.  
Attorneys for Defendant  
CJ TAN SPRING LLC  
200 I.U. Willets Road  
Albertson, New York 11507

BY: SEAN O'SULLIVAN, ESQ.

CARIELLO MATOS & PLUDWIN  
Attorneys for Defendants/Second Third-Party  
Plaintiffs  
KENDRA SCOTT DESIGN, INC. and KENDRA SCOTT,  
LLC  
333 Earle Ovington Boulevard  
P.O. Box 9372  
Uniondale, New York 11553-3644

BY: ALEX TEMPLE, ESQ.

LAW OFFICE OF NICOLE E. LESPERANCE  
Attorneys for Defendant/Third-Party  
Plaintiff  
JAMES AGRESTA CARPENTRY INC., D/B/A JA  
CARPENTRY INC. i/s/h/a JA CARPENTRY INC.  
D/B/A JAC  
P.O. Box 2903  
Hartford, Connecticut 06104-2903

BY: SCOTT L. GUMPert, ESQ.

- (1)
- (2)
- (3)
- (4)
- (5)
- (6)
- (7)
- (8)
- (9)
- (10)
- (11)
- (12)
- (13)
- (14)
- (15)
- (16)
- (17)
- (18)
- (19)
- (20)
- (21)
- (22)
- (23)
- (24)
- (25)

A P P E A R A N C E S:

LEWIS BRISBOIS BISGAARD & SMITH, LLP  
Attorneys for Third-Party Defendant and  
Second Third-Party Defendant  
PRECISE SERVICES CORP.  
77 Water Street, 21st Floor  
New York, New York 10005

BY: AARON SMALLETS, ESQ.

ALSO PRESENT:

DANIEL ROSENBLUM, ESQ.

(1)

(2)

STIPULATIONS

(3)

IT IS STIPULATED AND AGREED by and

(4)

between the attorneys for the respective parties

(5)

herein, and in compliance with Rule 221 of the

(6)

Uniform Rules for the Trial Courts:

(7)

(8)

THAT the parties recognize the

(9)

provision of Rule 3115 subdivisions (b), (c)

(10)

and/or (d). All objections made at a deposition

(11)

shall be noted by the officer before whom the

(12)

deposition is taken, and the answer shall be given

(13)

and the deposition shall proceed subject to the

(14)

objections and to the right of a person to apply

(15)

for appropriate relief pursuant to Article 31 of

(16)

the C.P.L.R.;

(17)

(18)

THAT every objection raised during

(19)

a deposition shall be stated succinctly and framed

(20)

so as not to suggest an answer to the deponent

(21)

and, at the request of the questioning attorney,

(22)

shall include a clear statement as to any defect

(23)

in form or other basis of error or irregularity.

(24)

Except to the extent permitted by CPLR Rule 3115

(25)

or by this rule, during the course of the

(1)

(2)

STIPULATIONS

(3)

examination persons in attendance shall not make

(4)

statements or comments that interfere with the

(5)

questioning.

(6)

(7)

THAT a deponent shall answer all

(8)

questions at a deposition, except (i) to preserve

(9)

a privilege or right of confidentiality, (ii) to

(10)

enforce a limitation set forth in an order of a

(11)

court, or (iii) when the question is plainly

(12)

improper and would, if answered, cause significant

(13)

prejudice to any person. An attorney shall not

(14)

direct a deponent not to answer except as provided

(15)

in CPLR Rule 3115 or this subdivision. Any

(16)

refusal to answer or direction not to answer shall

(17)

be accompanied by a succinct and clear statement

(18)

on the basis therefore. If the deponent does not

(19)

answer a question, the examining party shall have

(20)

the right to complete the remainder of the

(21)

deposition.

(22)

(23)

THAT an attorney shall not

(24)

interrupt the deposition for the purpose of

(25)

communicating with the deponent unless all parties

(1)

(2)

STIPULATIONS

(3)

consent or the determining whether the question

(4)

should not be answered on the grounds set forth in

(5)

Section 221.2 of these rules, and, in such event,

(6)

the reason for the communication shall be stated

(7)

for the record succinctly and clearly.

(8)

(9)

THAT the failure to object to any

(10)

question or to move to strike any testimony at

(11)

this examination shall not be a bar or waiver to

(12)

make such objection or motion at the time of the

(13)

trial of this action, and is hereby reserved; and

(14)

THAT this examination may be signed and sworn to

(15)

by the witness examined herein before any Notary

(16)

Public, but the failure to do so or to return the

(17)

original of the examination to the attorney on

(18)

whose behalf the examination is taken, shall not

(19)

be deemed a waiver of the rights provided by Rule

(20)

3116 and 3117 of the C.P.L.R., and shall be

(21)

controlled thereby; and

(22)

(23)

THAT the certification and filing

(24)

of the original of this examination are hereby

(25)

waived; and THAT the questioning attorney shall

(1)

(2)

STIPULATIONS

(3)

provide counsel for the witness examined herein

(4)

with a copy of this examination at no charge.

(5)

(6)

IT IS HEREBY STIPULATED AND AGREED

(7)

by and between counsel for all parties present

(8)

that Pursuant to CPLR section 3113 (d) this

(9)

deposition is being conducted by Videoconference,

(10)

that the Court Reporter, all counsel, and the

(11)

witness are all in separate remote locations and

(12)

participating via Videoconference

(13)

(LegalView/Zoom/WebEx) meeting under the control

(14)

of Lexitas Court Reporting Service, that the

(15)

officer administering the oath to the witness need

(16)

witness shall be sworn in remotely by the Court

(17)

Reporter after confirming the witness's identity,

(18)

that this Videoconference will not be recorded in

(19)

any manner, and that any recording without the

(20)

express written consent of all parties shall be

(21)

considered unauthorized, in violation of law, and

(22)

shall not be used for any purpose in this

(23)

litigation or otherwise.

(24)

(25)

IT IS FURTHER STIPULATED that

- (1)
- (2)
- (3)
- (4)
- (5)
- (6)
- (7)
- (8)
- (9)
- (10)
- (11)
- (12)
- (13)
- (14)
- (15)
- (16)
- (17)
- (18)
- (19)
- (20)
- (21)
- (22)
- (23)
- (24)
- (25)

STIPULATIONS

exhibits may be marked by the attorney presenting the exhibit to the witness, and that a copy of any exhibit presented to a witness shall be emailed to or otherwise in possession of all counsel prior to any questioning of a witness regarding the exhibit in question. All parties shall bear their own costs in the conduct of this deposition by Videoconference.

\* \* \*

(1) **A. MEROLA, M.D.**

(2) **A N D R E W M E R O L A, M.D., called as a**  
(3) **witness, having been first duly sworn by a Notary**  
(4) **Public within and for the State of New York, was**  
(5) **examined and testified as follows:**

(6)

(7)

(8) EXAMINATION BY

(9) **MR. GUMPERT:**

(10) Q. What is your name, please?

(11) **A. Andrew Merola, M.D.**

(12) Q. Dr. Merola, my name is Scott Gumpert. I  
(13) represent one of the Defendants in this matter and  
(14) I issued a subpoena to your office for you to come  
(15) testify and we are able to agree to have you  
(16) testify today. And I want to thank you, sir, for  
(17) appearing and testifying.

(18) I'm going to just be asking you questions  
(19) about medical records with regard to this case.  
(20) I'm not going to be asking you questions about your  
(21) expert medical opinion. You're not here as an  
(22) expert. You're simply here as a fact witness.

(23) I'm sure you've been deposed and I know  
(24) you've testified, actually once with me.

(25) **A. Oh, really?**

(1) **A. MEROLA, M.D.**

(2) Q. Yes, a long time ago. It was actually a  
(3) trial as COVID was kicking up that you testified in  
(4) Queens County.

(5) **A. Oh, wow. Okay.**

(6) Q. I was smart enough to be the only  
(7) attorney who said, no questions to you, which was  
(8) extremely helpful.

(9) **A. And greatly appreciated.**

(10) Q. By me as well, sir.

(11) Let me go through a few things really  
(12) quickly. I'm going to ask you some questions. If  
(13) at any time you don't understand the questions, let  
(14) me know and I'll be happy to rephrase it.

(15) If at any time you can't hear me, which  
(16) my fellow counsel will tell you that for me that's  
(17) usually never a problem, but let me know and I'll  
(18) speak louder.

(19) If at any time you need to take a break,  
(20) let us know. We will accommodate you. The only  
(21) proviso to that is if there's an open question  
(22) before you, please, we need an answer to that  
(23) question before we take that break.

(24) Just so the record is clear, you are here  
(25) today in response to that subpoena and you do not

(1) **A. MEROLA, M.D.**

(2) **have any legal representation here with you today;**  
(3) **is that correct?**

(4) **A. Correct.**

(5) Q. I don't expect this to be long, sir, so  
(6) we'll get started.

(7) You are a physician who has treated Maria  
(8) Quezada?

(9) **A. Yes.**

(10) Q. And this is with respect to injuries she  
(11) claims to have sustained in an accident in March of  
(12) 2018, I believe?

(13) **A. Let's see. I don't have any independent**  
(14) **recollection of the person so I just have to refer**  
(15) **to my notes.**

(16) Q. You have your file in front of you, sir?

(17) **A. Yes.**

(18) Q. Go right ahead.

(19) **A. Sure. So my first visit was February 11,**  
(20) **2019. She relayed a history of an accident as a**  
(21) **consequence of a fall occurring on March 6th of**  
(22) **2018.**

(23) Q. Sir, do you have in your records with you  
(24) any sort of intake sheet or anything that would  
(25) tell you how Miss Quezada was referred to you?

(1) **A. MEROLA, M.D.**

(2) **A. I know she came in as a Compensation**  
(3) **case. She had been previously treated by Dr. de**  
(4) **Moura, but I don't have an indication of who**  
(5) **referred her.**

(6) Q. You said as part of the initial visit  
(7) which was on February 11th of 2019 did you or  
(8) someone in your office take a history?

(9) **A. I did, yes. It's only me, so when I'm**  
(10) **seeing the patients it's particularly me, and then**  
(11) **I'm dictating right after I see the patient.**

(12) Q. I know you don't have any memory of this,  
(13) but just generally speaking, we spent several days  
(14) deposing Miss Quezada. Do you know if your  
(15) history, interview, or this preliminary meeting  
(16) when you met with her on February 11th of 2019, do  
(17) you know if that took place in English, Spanish, or  
(18) something else?

(19) **A. You know, I honestly don't recall, but I**  
(20) **do speak Spanish.**

(21) Q. So you would have been comfortable doing  
(22) this conversation in Spanish if necessary?

(23) **A. Yes.**

(24) Q. And did you go into any sort of specifics  
(25) as to how the accident occurred that is which she

(1) **A. MEROLA, M.D.**

(2) **is complaining of, March 6th of 2018?**

(3) **A. No, I did not.**

(4) Q. As part of this discussion you had with  
(5) her and taking a history which included the  
(6) accident, did you ask her about her past medical  
(7) history?

(8) **A. I did.**

(9) Q. And can you tell us what she told you  
(10) with respect to that?

(11) **A. So with respect to medical history she**  
(12) **had told me that she had a history of asthma and**  
(13) **hypercholesteremia.**

(14) Q. She didn't tell you the specific  
(15) mechanics of this fall, Doctor; correct?

(16) **A. That's correct. Other than the fact that**  
(17) **she relayed a fall occurring on March 6th of 2018 I**  
(18) **don't have any specifics.**

(19) Q. Did she ever tell you that she had any  
(20) type of prior falls?

(21) **A. I did not record or have any indication**  
(22) **of any prior falls, no.**

(23) Q. And, obviously, if she had said it you  
(24) would have recorded it in some way; correct?

(25) **A. Yes.**

(1) **A. MEROLA, M.D.**

(2) Q. Doctor, I'm going to ask for your  
(3) patience because I'm an absolute imbecile when it  
(4) comes to computers. I'm going to try to share the  
(5) screen here. If I'm successful I want to know if  
(6) you can see it, but bear with me, if you could?

(7) **A. Sure.**

(8) Q. Thank you, sir.

(9) These are medical records from Elmhurst  
(10) Hospital. And this is where she went after the  
(11) accident the day of the accident.

(12) Sir, you were given certain medical  
(13) records to review along with your treatment of Miss  
(14) Quezada?

(15) **A. So on the first visit I did see --**  
(16) **there's a section in my note that says, medical**  
(17) **records on that first intake sheet of February 11,**  
(18) **2019. And what I dictated there were that I**  
(19) **reviewed medical records from New York Spine**  
(20) **Institute, which demonstrated an anterior -- ACDF,**  
(21) **anterior cervical discectomy and spinal fusion of**  
(22) **the C5-6 vertebral segment with neurological**  
(23) **deficits, so the initial consultation was really**  
(24) **kind of a second opinion regarding her neck and**  
(25) **back condition.**

(1) **A. MEROLA, M.D.**

(2) Q. At any time during the course of your  
(3) treatment with Miss Quezada were you ever given the  
(4) Elmhurst Hospital records?

(5) **A. I don't know. I don't know that I've**  
(6) **seen them specifically. I don't have a**  
(7) **recollection of the patient's file. I would have**  
(8) **to go through all my notes.**

(9) Q. Because I don't want to keep you any  
(10) longer. On the screen there are 1449 pages to thi  
(11) hospital record. I am on page 1396. In the middle  
(12) is there a black band and in the upper part it  
(13) says, history of present illness?

(14) **A. Yes, sir.**

(15) Q. And can you read that, sir?

(16) **A. Sure. You want me to read that whole**  
(17) **section for you? It's only a couple of lines.**

(18) Q. Thank you, sir.

(19) **A. So it says, history of present illness.**  
(20) **Maria Quezada is a 37-year old female with a**  
(21) **history of depression, fibroid, hi presents with**  
(22) **LBP, low back pain times one month. Patient**  
(23) **attributes pain to accident at work where she fell.**  
(24) **Pain started then and two weeks later had another**  
(25) **mechanical fall onto LLB, left low back. And then**

(1) **A. MEROLA, M.D.**

(2) **says, left low back pain radiates down left leg.**

(3) **Denies weakness or numbness in extremities.**

(4) Q. Thank you, Doctor.

(5) Now, based on your history and your notes  
(6) and your treatment and whatever records you  
(7) reviewed, were you ever told by the Plaintiff that  
(8) when she reported to the emergency room she  
(9) complained of low back pain for approximately one  
(10) month, that the pain started, and then two weeks  
(11) later she had another mechanical fall onto her left  
(12) lower back? Did she ever tell you, Doctor, that  
(13) she's had more than one fall that she's complaining  
(14) caused her injuries?

(15) **A. Not that I'm aware of based on that**  
(16) **initial evaluation and intake with the patient, no.**

(17) Q. Subsequently, were you ever given any  
(18) additional medical records including those by  
(19) Elmhurst Hospital?

(20) **A. Not that I recall or am aware of.**

(21) **MR. O'SULLIVAN: Can we clarify the date**  
(22) **that this visit was done on for the record?**

(23) **MR. GUMPERT: It was the date or next**  
(24) **morning. March 7th, admit. Discharge, March**  
(25) **8th.**

(1) **A. MEROLA, M.D.**

(2) Q. Do you see the admit date and discharge  
(3) date?

(4) **A. I see it says, ED attending note at the**  
(5) **top of the page.**

(6) Q. Can you see New York Health and  
(7) Hospitals, Elmhurst.

(8) **MR. SMALLETS: Scroll down a little bit.**

(9) Q. So you see the admit and the discharge  
(10) date?

(11) **A. Yes.**

(12) Q. And then if I go down on this page that  
(13) is the history of present illness, so it's the same  
(14) page; right?

(15) **A. Yes. It's the same chart, yes.**

(16) Q. Doctor, I got confused here with the  
(17) question.

(18) You don't recall ever having received at  
(19) any point the Elmhurst Hospital records; correct?

(20) **A. That's correct.**

(21) Q. Doctor, this is now page 1359 of 1449 of  
(22) the Elmhurst Hospital record. If we go to the top  
(23) of the page do you see there is an admission date  
(24) of 3/15/18 and a discharge of 3/16/18.

(25) So approximately a week after the

(1) **A. MEROLA, M.D.**

(2) **accident it looks like she went back to Elmhurst;**  
(3) **right?**

(4) **A. Yes.**

(5) Q. Now, if we go down to the lower portion  
(6) of this page, you don't have to read the whole  
(7) thing, but do you see where it says, assessment and  
(8) plan?

(9) **A. Yes.**

(10) Q. And I'll just read it real quickly.

(11) 37-year old female. Past medical  
(12) history, asthma; correct?

(13) **A. Yes.**

(14) Q. Depression. Presents to emergency  
(15) department complaining of worsening back pain and  
(16) left leg pain. Status post two mechanical falls  
(17) over a four-month period. And I assume that's a  
(18) four-month period from March 15th of 2018.

(19) Doctor, did Miss Quezada in any of your  
(20) conversations with her in whatever language they  
(21) were in, did she ever tell you about two mechanical  
(22) falls that were spread out over a four-month  
(23) period?

(24) **A. Not that I recall, no.**

(25) Q. I'm going to stop sharing this. I'm

(1) A. MEROLA, M.D.

(2) going to try this. I would represent to you these  
(3) are records from Universal Pain Management PC.

(4) Do you know, Doctor, just generally  
(5) speaking were you given any records from Universal  
(6) Pain Management with respect to Miss Quezada?

(7) A. So I can't tell you with specific  
(8) recollection whether or not I recall reviewing any  
(9) of those records, but I do know that as part of the  
(10) whole treatment protocol we do get some IMEs and we  
(11) do get some records. My Windows is being updated  
(12) to Windows 11, so I do have some difficulty  
(13) accessing some of the Adobe Acrobat files, but I  
(14) have access to all of my notes. As far as I know  
(15) in my notes I haven't recorded any of those  
(16) records.

(17) Q. This has 201 pages total. This is page  
(18) six, and it's an office note of a visit which is  
(19) November 30th of 2018. And it says, followup  
(20) visit. Could you see that?

(21) A. Yes, I do.

(22) Q. It's a couple-page report. 11/30/18.  
(23) About eight months post accident.

(24) On the third page of this note -- at the  
(25) end there's an assessment and it has various

(1) **A. MEROLA, M.D.**

(2) **diagnoses. On page eight can you see the top line**  
(3) **that says, radiculopathy, cervical region?**

(4) **A. Yes.**

(5) Q. Do you see the fifth one down, M79.7?

(6) **A. No.**

(7) Q. Fibromyalgia; right?

(8) **A. Yes.**

(9) Q. Doctor, can you tell me what fibromyalgia  
(10) is?

(11) **A. Fibromyalgia mainly is a condition where**  
(12) **patients have musculoskeletal pain and symptoms**  
(13) **with multiple palpable trigger points in multiple**  
(14) **areas of their body.**

(15) Q. Is this something that would be  
(16) traumatically induced or is it something that just  
(17) comes about?

(18) **A. I mean, it's a really strange diagnosis**  
(19) **and is often times used with patients that have**  
(20) **conditions that have multiple musculoskeletal areas**  
(21) **where there's pain and tenderness. It's typically**  
(22) **a rheumatological assessment. It's a condition**  
(23) **that happens to be more common in women. You know,**  
(24) **it's a little bit outside of my purview as an**  
(25) **orthopedic surgeon just as it's typically dealt**

(1) **A. MEROLA, M.D.**

(2) **with rheumatologists. The consideration for**  
(3) **orthopedics is, you know, does it contribute to any**  
(4) **of our orthopedic conditions. Aside from that,**  
(5) **it's not something we specifically deal with, so**  
(6) **I'm not completely an expert in fibromyalgia. It's**  
(7) **one of those kind of generalized diagnoses.**

(8) Q. If you were to put it in a big basket it  
(9) would be a chronic condition; right?

(10) **A. Yeah, kind of a good way to look at it.**  
(11) **It can be chronic, sure. In a lot of ways it's**  
(12) **kind of a chronic condition because it lasts for a**  
(13) **while, sure.**

(14) Q. And this record doesn't indicate when she  
(15) was first diagnosed with fibromyalgia; right?

(16) **A. Correct, it does not.**

(17) Q. In any of your conversations with Miss  
(18) Quezada, did she ever tell you she was diagnosed  
(19) with fibromyalgia?

(20) **A. Not that I recall, no.**

(21) Q. I'm going to try again with another  
(22) record here. Bear with me.

(23) Do you see a record from Mount Sinai  
(24) Queens?

(25) **A. Yes.**

(1) **A. MEROLA, M.D.**

(2) Q. As you can see, this is an admission  
(3) dated September 10th of 2021. It looks like  
(4) discharge is September 10th of 2021 as well?

(5) **A. Yes.**

(6) Q. Do you see in the middle of that page  
(7) there's a past medical history?

(8) **A. Yes.**

(9) Q. Do you see the last one under that  
(10) category?

(11) **A. Yes.**

(12) Q. Can you just tell me what that says, sir?

(13) **A. It says, wedge compression fracture of**  
(14) **T7-T8 vertebra.**

(15) Q. And in September of 2021 Miss Quezada was  
(16) still under your care; is that correct?

(17) **A. Yes.**

(18) Q. And at any point did she ever tell you  
(19) that she suffered a wedge compression fracture at  
(20) the T7-T8 vertebral level?

(21) **A. I'm just looking at my notes from around**  
(22) **that period of time. I see a note from October 25,**  
(23) **2021. No mention of it on that note. There's a**  
(24) **note 7/19/21 as well. And, no, I do not see a**  
(25) **mention on the 7/19/21 or 10/25/21 note.**

(1) **A. MEROLA, M.D.**

(2) Q. Let me just jump to one thing here.

(3) The first time you saw Miss Quezada was  
(4) on February 11th of 2019; correct?

(5) **A. Yes.**

(6) Q. I'm going to share screen.

(7) Can you see that report, sir, on your  
(8) screen?

(9) **A. Yes.**

(10) Q. And it says, initial evaluation, February  
(11) 11, 2019. So this is the first time you saw Miss  
(12) Quezada; correct?

(13) **A. Yes.**

(14) Q. And it lists the anterior cervical  
(15) discectomy, which you said was previously done at  
(16) C5-6 on September 11th of 2018; correct?

(17) **A. Yes.**

(18) Q. And you also, as part of this report, you  
(19) note that you reviewed certain MRI films?

(20) **A. Yes.**

(21) Q. That's in the last full paragraph of your  
(22) report on page two?

(23) **A. Yes.**

(24) Q. And the last sentence before it says,  
(25) plan is to update MRI, can you just read that

(1) **A. MEROLA, M.D.**

(2) **sentence? It's really the second sentence of it**  
(3) **where it says, the diagnostic testing?**

(4) **A. The diagnostic imaging studies themselves**  
(5) **demonstrate some evidence of a normal age-related**  
(6) **changes which include spondylogenic changes**  
(7) **additionally -- poor grammar, sorry. Compression**  
(8) **is noted at the C3-4, 4-5, and 5-6 segments.**

(9) Q. Now, just related to what you were  
(10) writing there, is that compression that's noted at  
(11) those three levels part and parcel of the  
(12) age-related changes that you note in that?

(13) **A. Sure. They go hand in hand, yes.**

(14) Q. Now, when you first saw her on February  
(15) 11th of 2019 she had had cervical fusion at C5-6,  
(16) which was done in 2018 by Dr. de Moura?

(17) **A. That's correct.**

(18) Q. And then you began to see her on a  
(19) regular basis?

(20) **A. Yes.**

(21) Q. And you performed surgery on March 24th  
(22) of 2021; would that be correct, sir?

(23) **A. Yes.**

(24) Q. Can you see that operative report on your  
(25) screen, sir?

(1) **A. MEROLA, M.D.**

(2) **A. Yes.**

(3) Q. I'm going to scroll down. This is the  
(4) report that you generated after the surgery that  
(5) you did; is that correct?

(6) **A. Yes.**

(7) Q. And that was done at the C5-6 level?

(8) **A. 4-5.**

(9) Q. I'm sorry, 4-5.

(10) **A. Yes.**

(11) Q. Dr. de Moura's surgery was done on C5-6;  
(12) is that correct?

(13) **A. Yes.**

(14) Q. As part of your surgery you removed the  
(15) hardware he put in and replaced it?

(16) **A. Yes, that's correct. I'm sorry I**  
(17) **interrupted you.**

(18) Q. Explain what you did, sir.

(19) **A. Okay, great. Yes. So he had done a**  
(20) **C5-C6 segment. And I was doing what's -- I was**  
(21) **addressing what's called an adjacent segment**  
(22) **breakdown. And the adjacent segment is the C4-5**  
(23) **level. So I did remove the plate across C5-6 to**  
(24) **make sure that it was stable and solid. And then I**  
(25) **basically fixed the C4-5 segment and then just put**

(1) **A. MEROLA, M.D.**

(2) **a spanning plate across the whole thing.**

(3) Q. And the procedure performed you called it  
(4) a revision surgery?

(5) **A. That's right because it's a redo surgery**  
(6) **because of the history of previous surgery.**

(7) Q. I don't mean this to be an uncomfortable  
(8) question, Doctor?

(9) **A. Sure.**

(10) Q. Was any reason, any possible reason for  
(11) the surgery that you had to do a result of a  
(12) failing of the surgery that was done by Dr. de  
(13) Moura?

(14) **A. Not an uncomfortable question at all.**  
(15) **And, you know, it's not a failure of the previous**  
(16) **arthrodesis or quote-unquote fusion. That level**  
(17) **was solidly fused. It is -- the surgery is a**  
(18) **consequence of what we call an adjacent segment**  
(19) **breakdown. In other words, stress, transfer to an**  
(20) **adjacent segment that then, you know, for lack of a**  
(21) **better term misbehaves.**

(22) Q. So this obviously was level one above the  
(23) level that Dr. de Moura did that you did the  
(24) surgery on?

(25) **A. Yes.**

(1) **A. MEROLA, M.D.**

(2) Q. Sir, I'm going to share again.

(3) Can you see your May 6th of 2019 report?

(4) **A. Yes.**

(5) Q. After the February 11th initial visit you  
(6) started to see her on a regular basis; correct,  
(7) Doctor?

(8) **A. Yes.**

(9) Q. And you saw her on May 6th of 2019 and  
(10) you made this office note; correct?

(11) **A. Yes.**

(12) Q. And if you went to page two you see  
(13) there's a section there that says, MRIs?

(14) **A. Yes.**

(15) Q. And that's the findings based on your  
(16) review of the films or the reports or something  
(17) else, Doctor?

(18) **A. Both.**

(19) Q. Can you just read the first sentence of  
(20) that?

(21) **A. Magnetic resonance imaging scan of the**  
(22) **cervical spine demonstrates herniation at C3-4.**  
(23) **Status post ACDF at C5-6 vertebral segment.**

(24) Q. Just so the record is clear, ACDF is  
(25) Anterior Cervical Discectomy and Fusion or

(1) **A. MEROLA, M.D.**

(2) **something along those lines?**

(3) **A. You are correct.**

(4) Q. And what you're talking about there was  
(5) Dr. de Moura's surgery?

(6) **A. Yes.**

(7) Q. You said that the MRI found a herniation  
(8) at the C3-4 level?

(9) **A. Yes.**

(10) Q. Is there any reference here to any sort  
(11) of disc pathology at the C4-5 level where you did  
(12) your surgery?

(13) **A. Not on May 6th of 2019, no.**

(14) Q. So between May 6th of 2019 and when the  
(15) surgery was done in 2021?

(16) **A. Yes, '21.**

(17) Q. That's when this developed?

(18) **A. Yes, that's correct. C4-C5 began to, as  
(19) I say for lack of a better term, misbehave.**

(20) **Secondary to increased stress at the C4-5 segment  
(21) between '19 and '21, that's correct.**

(22) Q. Sir, do you see a report of yours,  
(23) followup visit for May 1, 2023 on the screen?

(24) **A. Yes.**

(25) Q. And do you see the second sentence of

(1) **A. MEROLA, M.D.**

(2) **that report?**

(3) **A. Page one, yes.**

(4) Q. Can you read that, please?

(5) **A. Right under, patient remains 100 percent**  
(6) **totally disabled?**

(7) Q. Yes, Doctor.

(8) **A. To within a reasonable degree of medical**  
(9) **certainty this patient's spinal injuries are**  
(10) **causally related to the accident.**

(11) Q. Doctor, these are office visit notes?

(12) **A. Yes.**

(13) Q. So someone comes to visit you, you write  
(14) down what you do, what you discussed, you have a  
(15) plan, a diagnosis, and a prognosis?

(16) **A. Yes.**

(17) Q. Is it usual on your office notes to put  
(18) down an opinion within a reasonable degree of  
(19) medical certainty as the causal relationship as  
(20) opposed to constructing a narrative report that you  
(21) might send to let's say an attorney?

(22) **A. Great question. So the New York State**  
(23) **Workers' Compensation guidelines changed. I can't**  
(24) **tell you the exact date, but if I go back into my**  
(25) **notes, for example, I believe it was around 2020**

(1) **A. MEROLA, M.D.**

(2) **when the Comp reporting requirement -- I'm sorry,**  
(3) **I'm mentioning Comp. Is that okay in the EBT?**  
(4) **Typically --**

(5) Q. Today it's fine. You can talk about  
(6) anything you want, Doctor.

(7) A. I just don't want to speak out of turn.

(8) Q. No problem.

(9) A. So if you notice in 2021 there are no  
(10) **causations statements. And in 2022 the causation**  
(11) **statements become apparent in the notes as a**  
(12) **requirement from the Compensation guidelines. So**  
(13) **that's simply in response to the Compensation**  
(14) **guidelines. That's the only reason that that's put**  
(15) **in there in order to basically say that we are**  
(16) **treating that patient based on the Workers'**  
(17) **Compensation guidelines and the accepted sites of**  
(18) **injury.**

(19) Q. So, Doctor, whether it's mandated or it's  
(20) in a narrative report or wherever, you are  
(21) sometimes called upon to determine the causal  
(22) connection of injuries to a specific event,  
(23) especially if there's personal injury litigation  
(24) involved; correct?

(25) A. Yes.

(1) **A. MEROLA, M.D.**

(2) Q. And you do that based on your  
(3) examination, your interview of the client, taking a  
(4) -- that's why a past medical history is taken; is  
(5) that correct, sir?

(6) **A. Yes.**

(7) Q. And then based on all that accumulative  
(8) you based that opinion onto whether it's causally  
(9) connected within a reasonable degree of medical  
(10) certain; correct?

(11) **A. Yes.**

(12) Q. As a general principal?

(13) **A. As a general principal and based on the**  
(14) **information, as you indicated, provided to me by**  
(15) **the patient's history and, you know, their prior**  
(16) **treatment and all of those things, yes.**

(17) Q. And you can only make your determination  
(18) as to causal connection based on your review of  
(19) MRIs, review of medical records that you've been  
(20) given, review of the history that you've been told  
(21) by the historian, in this case the patient;  
(22) correct?

(23) **A. That's right, yes.**

(24) Q. Given the fact that you weren't given  
(25) Elmhurst Hospital records that show at least one or

(1) A. MEROLA, M.D.  
(2) two prior accidents, you weren't given the  
(3) Universal Pain Managements records that show a  
(4) history of fibromyalgia, you weren't given the  
(5) Mount Sinai records that showed a wedge fracture at  
(6) T7-T8, and she never told you about any of these  
(7) things in giving you the history, don't you think  
(8) that these factors would have been important in  
(9) making your decision with respect to causal  
(10) connection of these injuries to this accident?

(11) A. Yes. Those are interesting factors and  
(12) certainly worth looking into in terms of being able  
(13) to relate 100 percent causation for the accident.  
(14) Yes, you are correct.

(15) Q. Sir, I want to thank you for this as  
(16) well. Yesterday as we were trying to set this up  
(17) your office, I assume at your direction, sent me a  
(18) bunch of records, some of which we looked at today.  
(19) There was also a record that stated that your  
(20) billing is done and kept in a separate department  
(21) and you gave us a fax number to access.

(22) Do you have any notes that would at least  
(23) indicate whether for Miss Quezada the compensation  
(24) that you received for her treatment, do you know if  
(25) it was Workers' Comp, was it through direct

(1) **A. MEROLA, M.D.**

(2) **payment, was there a litigation funding company; is**  
(3) **there any way that you can determine how you were**  
(4) **compensated for the medical treatment that you gave**  
(5) **to Miss Quezada during the course of her treatment?**

(6) **A. So it's Workers' Comp and would be**  
(7) **completely done through the Workers' Compensation**  
(8) **carrier.**

(9) Q. And from the records that were sent  
(10) yesterday, and we also got records pursuant to the  
(11) authorization, but the records that were sent  
(12) yesterday just by eyeballing it quickly, it looks  
(13) like the last office visit note you included or  
(14) your office included to us yesterday was November  
(15) 20th of 2023.

(16) Does that comport with what the records  
(17) you have there, Doctor?

(18) **A. Yes, you are correct, that was my last**  
(19) **visit with the patient.**

(20) Q. And would it be fair to say that from  
(21) November 20th of 2023 until today, November 4th of  
(22) 2025, just about two years, you have not had any  
(23) visits with Miss Quezada?

(24) **A. That's correct.**

(25) Q. She hasn't called, no appointments

(1) **A. MEROLA, M.D.**

(2) **scheduled, no telemedical visits, whatever they're**  
(3) **called, anything like that?**

(4) **A. You are correct.**

(5) Q. Sir, obviously, the other attorneys may  
(6) have followup questions. I don't know if they  
(7) will, but I only have one more area I'm going to  
(8) question you about. And I want to apologize in  
(9) advance if it's uncomfortable, but I just have a  
(10) couple of questions with regard to, have you been  
(11) involved in any litigation with respect to claims  
(12) about billing or surgeries rendered, civil  
(13) litigation, lawsuits?

(14) **A. So any questions regarding civil**  
(15) **litigations or lawsuits I would have to refer you**  
(16) **to my counsel. I can tell you that as far as I**  
(17) **know there are no pending issues.**

(18) Q. And I understand that just from what you  
(19) said that there are no pending issues, was that as  
(20) a result of settlements or something else?

(21) **A. You know, once again, I don't have any**  
(22) **details with respect to that, but I can certainly**  
(23) **refer you to my house counsel.**

(24) Q. At this point you don't know or you're  
(25) unable to say at this point, let's put it this way,

(1) **A. MEROLA, M.D.**  
(2) **if there was any sort of disposition of these cases**  
(3) **of which you're no longer part of, whether there**  
(4) **was any sort of settlement agreement or**  
(5) **accommodation or any sort of agreement that was**  
(6) **entered into either on your behalf or the**  
(7) **plaintiff's behalf; would that be fair to say?**

(8) **A. Yes.**

(9) Q. I have no further questions at this time.  
(10) What I would like to do is take a few minutes to  
(11) look at my notes and see if I have anything else,  
(12) but would you guys like to question while I'm doing  
(13) that or if you have no questions, if you can give  
(14) me five minutes. Whatever you guys want.

(15)  
(16) EXAMINATION BY

(17) **MR. TEMPLE:**

(18) Q. I have a few questions.

(19) Dr. Merola, I might move around a little  
(20) bit just to not cover anything we previously  
(21) covered. Okay?

(22) **A. Yes.**

(23) Q. Between your initial visit with Miss  
(24) Quezada on February 11, 2019 and the surgery you  
(25) performed on March 24, 2021, did you review any

(1) **A. MEROLA, M.D.**

(2) **followup or any additional EMG or NCV studies?**

(3) **A. I'm going to reference my diagnostics for**  
(4) **you, if I can.**

(5) **Q. Thank you.**

(6) **A. So there was an EMG/NCV of the upper**  
(7) **extremities that was done at Universal Pain**  
(8) **Management on January 23rd of 2019.**

(9) **Do you want me to read the impression for**  
(10) **you?**

(11) **Q. No, that's fine.**

(12) **Was that the one that said mild**  
(13) **radiculopathy at C4-C5?**

(14) **A. That's correct.**

(15) **Q. But after that report was there any**  
(16) **further EMG or NCV diagnostic study that you**  
(17) **reviewed before you performed your operation on**  
(18) **March 24th of 2021?**

(19) **A. No. The only one other done was the**  
(20) **postop from November 15th of '23.**

(21) **Q. In looking at your operative report that**  
(22) **Mr. Gumpert had on the screen earlier today, your**  
(23) **preoperative and postoperative diagnosis in that**  
(24) **report they both included myelopathy. When did you**  
(25) **diagnose Miss Quezada with myelopathy before the**

(1) A. MEROLA, M.D.

(2) surgery of 3/24/21?

(3) A. Hang on one sec. I'll take a look for  
(4) you.

(5) Q. Thank you.

(6) A. My note -- I'm looking for the notes that  
(7) are most proximate to the preoperative assessment.  
(8) In December of 2020 when I saw her on December 18th  
(9) of 2020 one of the things that was concerning was  
(10) she had looked like what I appreciated as what's  
(11) known as an inverted flexor response, which is an  
(12) abnormal contraction of the hand and wrist flexors  
(13) when you're tapping on the brachioradialis reflex.

(14) Q. Is that one of the clinical indicators of  
(15) myelopathy?

(16) A. Yes. She also had some Hoffman's signs,  
(17) but an inverted flexor response is kind of an  
(18) indication of a hyperreflexia, which is always a  
(19) bit concerning.

(20) Q. Is that something that a patient could  
(21) exhibit with symptom magnification?

(22) A. No, because it's a reflex. So you tap on  
(23) the brachioradialis reflex area tendon and then  
(24) you're looking for the hand and finger flexors and  
(25) wrist flexors to contract.

(1) **A. MEROLA, M.D.**

(2) Q. Are those the Hoffman's signs and the  
(3) inverted flexor responses, are those the two  
(4) symptoms or clinical indicators that you were able  
(5) to ascertain that led to the diagnosis of  
(6) myelopathy?

(7) **A. Yeah, those are the ones she manifested**  
(8) **that were certainly concerning.**

(9) Q. Are you aware of any other conditions or  
(10) illnesses or injuries that could lead to those  
(11) symptoms or indicators?

(12) **A. Based on her examination she didn't have**  
(13) **any other central nervous system or brain findings.**  
(14) **In the lower extremities she did not exhibit any**  
(15) **hyperreflexia. She didn't exhibit any ataxia. She**  
(16) **didn't demonstrate any significant paraparesis or**  
(17) **any other compounding neurological issues that**  
(18) **would lead me to believe that there was something**  
(19) **else going on.**

(20) Q. Now, you referenced a couple of times  
(21) today that you're looking at your notes. And I  
(22) know that Counsel for that JA Carpentry has shown  
(23) you some records that you provided in response to  
(24) the subpoena. And I know he showed you some  
(25) additional visit notes that were not included in

(1) **A. MEROLA, M.D.**

(2) **those records that were provided in response to the**  
(3) **subpoena. You said you also had a problem with**  
(4) **accessing certain Adobe PDFs because of the Windows**  
(5) **11 update?**

(6) **A. Yes.**

(7) Q. In general, other than the visit notes  
(8) that you have seen today and those that you  
(9) provided in response to the subpoena, are you in  
(10) possession of any other records related to your  
(11) treatment of Miss Quezada?

(12) **A. No.**

(13) Q. Were you ever advised by the Plaintiff  
(14) herself, Miss Quezada or any of her treating  
(15) providers that she previously suffered from -- and  
(16) I'm going to butcher this pronunciation,  
(17) neurocysticercosis?

(18) **A. No, not that I heard of. Neuro?**

(19) Q. Neurocysticercosis?

(20) **A. No, not that I'm aware of.**

(21) Q. I'll spell that for the record.

(22) N-E-U-R-O-C-Y-S-T-I-C-E-R-C-O-S-I-S.

(23) Did she ever indicate to you that she had  
(24) a parasitic brain infection at any point in time?

(25) **A. No.**

(1) **A. MEROLA, M.D.**

(2) Q. Were you ever advised by Miss Quezada or  
(3) any of her treating providers that she had treated  
(4) at Elmhurst Hospital before the date of this  
(5) accident for symptoms related to a parasitic brain  
(6) infection resulting in neurocysticercosis?

(7) **A. No.**

(8) Q. What other clinical signs or symptoms  
(9) would be included in a diagnosis myelopathy? Would  
(10) there be any other more common symptoms like  
(11) weakness in the arms, numbness, tingling, loss of  
(12) coordination?

(13) **A. Yes, so those are some things that could**  
(14) **be related to myelopathy. As you know, myelopathy**  
(15) **can be a spectrum of issues going from very minimal**  
(16) **findings to more overt significant findings leading**  
(17) **to difficulty with gait and using your arms and**  
(18) **hands or legs and feet. So it's a spectrum and**  
(19) **some of those that you listed are certainly part of**  
(20) **that spectrum.**

(21) Q. When you saw Miss Quezada, were you  
(22) seeing her at an office in Brooklyn or in the city?

(23) **A. So I have an office at 141 West 28th**  
(24) **Street in Manhattan. And then also an office at 55**  
(25) **8th Avenue in Park Slope, Brooklyn. I stopped**

(1) **A. MEROLA, M.D.**

(2) **seeing patients at the Park Slope location when**  
(3) **COVID hit and would only see them in the Manhattan**  
(4) **office thereafter.**

(5) Q. So from February 11th of 2019 until your  
(6) last visit with Miss Quezada, did you have any  
(7) contact with any of her attorneys who represented  
(8) her in this case?

(9) **A. No.**

(10) Q. I don't think I have anything further.  
(11) I'll turn it over Sean.

(12)

(13) EXAMINATION BY

(14) MR. O'SULLIVAN:

(15) Q. Dr. Merola, good afternoon.

(16) **A. Hi.**

(17) Q. My name is Sean O'Sullivan. The firm I  
(18) work for is representing a Defendant called CJ Tan  
(19) in the case. I just have a few questions for you.

(20) Now, your first visit for examination of  
(21) Miss Quezada was on February 11, 2019; correct?

(22) **A. Yes.**

(23) Q. Was your next visit on May 6, 2019?

(24) **A. Yes.**

(25) Q. When was your next visit with Miss

(1) **A. MEROLA, M.D.**

(2) **Quezada?**

(3) **A. Let's see. July 27th of 2020.**

(4) Q. And was your next visit with her on  
(5) September 28, 2020?

(6) **A. Yes.**

(7) Q. When was your next visit with her after  
(8) that?

(9) **A. November 9, 2020.**

(10) Q. And your next visit after that?

(11) **A. December 18, 2020.**

(12) Q. When was your next visit with the  
(13) Plaintiff after December 18, 2020?

(14) **A. April 5, 2021.**

(15) Q. In the interim had you performed the  
(16) surgery on her?

(17) **A. Correct.**

(18) Q. And the followup visit was April what?

(19) **A. Five, '21.**

(20) Q. And what generally, by looking at your  
(21) records, what were your discussions with the  
(22) Plaintiff at that postop visit?

(23) **A. First postop visit April 5, 2021?**

(24) Q. Yes.

(25) **A. So that first visit is to just make sure**

(1) **A. MEROLA, M.D.**

(2) **that there are no issues or concerns regarding the**  
(3) **actual surgery itself. She appeared to be**  
(4) **postsurgically stable and I indicated that the**  
(5) **patient -- that she could start physical therapy**  
(6) **and she should avoid bending, lifting, twisting,**  
(7) **and repetitive motion to the neck and back.**

(8) Q. Did you prescribe any physical therapy at  
(9) that time?

(10) **A. Yes. I would have given a script to**  
(11) **start postoperative physical therapy.**

(12) Q. Do your records indicate whether or not  
(13) Miss Quezada underwent any physical therapy  
(14) following the surgery?

(15) **A. Let's see. I'm looking for the**  
(16) **subsequent visits and I didn't record any physical**  
(17) **therapy visits.**

(18) Q. After April 5th of 2021, did you see her  
(19) again?

(20) **A. Yes.**

(21) Q. When was the next visit?

(22) **A. April 19, '21.**

(23) Q. What was the purpose of that?

(24) **A. Evidently she had had some acute pain and**  
(25) **symptoms for which she presented to the emergency**

(1) **A. MEROLA, M.D.**  
(2) **department at Lower Manhattan Hospital. They did**  
(3) **x-rays and I was able to reexamine the patient and**  
(4) **look at the x-rays. And she remained otherwise**  
(5) **stable. So she had come in for that visit**  
(6) **secondary to the fact that she had had some pain**  
(7) **and symptoms, was concerned, and presented to the**  
(8) **emergency department at Lower Manhattan.**

(9) Q. That was Lower Manhattan Hospital?

(10) A. Yes.

(11) Q. And where in Lower Manhattan is that  
(12) located?

(13) A. Over by -- you know where City Hall is?

(14) Q. Yes.

(15) A. There's Gold and William. So it's kind  
(16) of on the corner between Gold and William.

(17) Q. And was Miss Quezada still reporting  
(18) acute pain to you on April 19th?

(19) A. No, she had -- she was better. There  
(20) were no significant new onset symptoms that I  
(21) appreciated.

(22) Q. So would it be fair to say her symptoms  
(23) improved?

(24) A. Yes, correct.

(25) Q. When was your next visit with Miss

(1) **A. MEROLA, M.D.**

(2) **Quezada?**

(3) **A. June 21, 2021.**

(4) Q. Again, are these visits in your Manhattan  
(5) office?

(6) **A. Yes.**

(7) Q. And what were her complaints at that  
(8) time?

(9) **A. Let's see. At this time I think -- so**  
(10) **she had indicated her neck was getting better.**  
(11) **Looks like she was having trouble with her low**  
(12) **back, bending, lifting, twisting activities.**

(13) Q. Did she make any specific complaints  
(14) about her lower back?

(15) **A. The only thing that I recorded was**  
(16) **difficulty with ability to bend, lift, twist, push,**  
(17) **pull, stoop, crawl, sit, or stand for long periods**  
(18) **of time. Difficulty putting on shoes and socks.**  
(19) **And she reported some difficulty with personal care**  
(20) **and hygiene, which I attributed these things to the**  
(21) **lower back.**

(22) Q. Can you tell when your next visit was  
(23) with her?

(24) **A. July 19, '21.**

(25) Q. What was the sum and substance of any

(1) **A. MEROLA, M.D.**

(2) **conversations with Miss Quezada at that time?**

(3) **A. Neck had been getting better. She**  
(4) **indicated surgery was helpful. Low back pain with**  
(5) **some symptoms traveling into the lower extremities.**

(6) **Q. What type of symptoms going into the**  
(7) **lower extremities?**

(8) **A. Let's see. What I transcribed was pain**  
(9) **in the back traveling into the lower extremities,**  
(10) **leg and feet. Pins, needles, numbness, and**  
(11) **tingling, weakness. Back brace and a cane were**  
(12) **utilized. And she was pending a left hip surgery**  
(13) **with Dr. Touliopoulos.**

(14) **Q. Now, you said was there numbness and**  
(15) **tingling reported?**

(16) **A. Yes.**

(17) **Q. Did you see Miss Quezada again after that**  
(18) **date?**

(19) **A. Yes. October 25th of '21.**

(20) **Q. What was the sum and substance of your**  
(21) **discussions with her then?**

(22) **A. At that time it appears as though she had**  
(23) **had hip surgery with Dr. Touliopoulos and was**  
(24) **recovering from the hip surgery. Low back was her**  
(25) **primary symptom at that time.**

(1) **A. MEROLA, M.D.**

(2) Q. What was the problem with her lower back?

(3) **A. Low back pain with some radiating**  
(4) **symptoms into the legs just as it had been on her**  
(5) **previous visit.**

(6) Q. Did you have another visit with her?

(7) **A. Yes, December 13, 2021.**

(8) Q. What was the sum and substance of your  
(9) discussions with the patient?

(10) **A. Pretty much identical. She was**  
(11) **recovering from her hip surgery. Continued to**  
(12) **remain symptomatic with her lower back.**

(13) Q. What was that about her lower back?

(14) **A. I'm sorry. Same thing. Low back pain**  
(15) **with some radiating pain into the legs.**

(16) Q. And did you have any further visits with  
(17) her?

(18) **A. In '22 I saw her once in September.**

(19) Q. September what?

(20) **A. 20 -- it looks like September 12th of**  
(21) **'22.**

(22) Q. What were your discussions at that time?

(23) **A. Let me pull it up right now. Low back**  
(24) **pain was her primary issue. Neck had clearly**  
(25) **gotten better. And she was still recovering from**

(1) **A. MEROLA, M.D.**

(2) **her hip surgery.**

(3) Q. Did you have any further visits with her?

(4) **A. Yes, I saw her from January through**  
(5) **November of '23.**

(6) Q. What was the date in January?

(7) **A. January 30th.**

(8) Q. Of 2023. And then you mentioned what,  
(9) November?

(10) **A. Yes. So I seen her -- I can list the**  
(11) **dates in 2023 if you'd like.**

(12) Q. How many times did you see her in 2023?

(13) **A. Six times.**

(14) Q. And the last visit in 2023 was when,  
(15) November what?

(16) **A. November 20th.**

(17) Q. At the last visit on November 20, 2023,  
(18) what was the sum and substance of your  
(19) conversations then?

(20) **A. So November 10, 2023 --**

(21) Q. Was it November 20th?

(22) **A. Yes, November 20, 2023, correct. She did**  
(23) **have some neck pain, but not radiating pain. She**  
(24) **had some upper thoracic pain. She had some low**  
(25) **back pain. She had some shoulder pain and**

(1) **A. MEROLA, M.D.**

(2) **headaches with body aches and symptoms. We**  
(3) **reviewed a number of postoperative diagnostics.**  
(4) **Her examination showed that she was essentially**  
(5) **otherwise neurologically stable.**

(6) Q. And did you see Miss Quezada at all in  
(7) 2024?

(8) **A. No, I have not.**

(9) Q. So was the last visit on November 20,  
(10) 2023?

(11) **A. That's correct.**

(12) Q. Just to back up for a moment.

(13) Was it Dr. de Moura that did the initial  
(14) surgery to her cervical spine?

(15) **A. Yes.**

(16) Q. Are you and Dr. de Moura part of the same  
(17) group?

(18) **A. No.**

(19) Q. Did Miss Quezada ever indicate why she  
(20) did not go back to Dr. De Moura?

(21) **A. No.**

(22) Q. I don't think I have anything else.

(23) Thank you.

(24)

(25)

(1) **A. MEROLA, M.D.**

(2) **EXAMINATION BY**

(3) **MR. SMALLETS:**

(4) Q. Hi, Dr. Merola. I represent Precise  
(5) Services in this matter. Just a quick followup.  
(6) Just a quick clarification.

(7) You noted in some of your reports that  
(8) Plaintiff remains 100 percent totally disabled.  
(9) I'll refer you specifically to as recently as  
(10) October 16, 2023.

(11) Does that mean she's totally disabled  
(12) from all work or from her most recent job?

(13) **A. Just her own job while she recovered from**  
(14) **her surgeries and resolved her issues.**

(15) Q. And does that mean she can maybe perhaps  
(16) perform other work?

(17) **A. Sure.**

(18) Q. I have no further questions.

(19)

(20) FURTHER EXAMINATION BY

(21) **MR. GUMPERT:**

(22) Q. I just have two or three questions and  
(23) then I'll be done.

(24) Doctor, I asked you, and I'm going off my  
(25) notes, so if this is wrong, I apologize, but just

(1) **A. MEROLA, M.D.**  
(2) **briefly I asked you about the records that showed a**  
(3) **T7-T8 wedge fracture in September of 2021, I**  
(4) **believe. And you said that you referred -- I think**  
(5) **your answer was you looked at your office visit**  
(6) **reports that sort of wrapped around that time and**  
(7) **you didn't see any reference to it?**

(8) **A. Yes.**

(9) Q. My question is, would it be anywhere else  
(10) specifically with respect to that possible wedge  
(11) fracture that was in the records that if she told  
(12) you they would be somewhere else that you maybe  
(13) didn't look at, but is it pretty much your  
(14) testimony that she never told you that either?

(15) **A. I mean, I was not treating the thoracic**  
(16) **spine. As I said, I don't have any independent**  
(17) **recollection of any of this. As far as I know,**  
(18) **it's not contained within my notes.**

(19) Q. So just like with if there was a prior  
(20) accident or a couple of prior accidents you would  
(21) have put that somewhere in your record or chart;  
(22) right?

(23) **A. If I was aware of that, yes, I would.**

(24) Q. And if you were aware of the fibromyalgia  
(25) you would have put that somewhere in the chart?

(1) **A. MEROLA, M.D.**

(2) **A. Yes.**

(3) Q. And the same way with the wedge fracture,  
(4) if you had been told that you would have put it  
(5) somewhere, not necessarily in those two visits, but  
(6) somewhere in your chart; correct?

(7) **A. Yes.**

(8) Q. Now, you testified with questioning by  
(9) Mr. O'Sullivan and you were talking about she was  
(10) making complaints of lower back surgery --  
(11) complaints to her lower back with some radiation;  
(12) correct?

(13) **A. Yes.**

(14) Q. At any point during your course of  
(15) treatment with Miss Quezada, did you ever perform  
(16) any sort of surgery to her lower spine?

(17) **A. No.**

(18) Q. And, sir, I just have one more question  
(19) again. Do with it what you will, but you said that  
(20) there was certain -- you were no longer a party to  
(21) these litigations and you referred me with respect  
(22) to your house counsel or personal counsel. This is  
(23) just a yes or no question.

(24) As part of being taken out of those  
(25) litigations, did you ever enter into any agreements

(1) **A. MEROLA, M.D.**

(2) **in which at least a part of it was that you would**  
(3) **not render any expert on certain cases?**

(4) **A. Once again, you know, all these details**  
(5) **have to go towards the house counsel because my**  
(6) **lawyer handled everything so I'm in his hands.**

(7) **Q. I appreciate that, Doctor. Who is your**  
(8) **house counsel?**

(9) **A. His name is Moe Fodeman at Wilson**  
(10) **Sonsini.**

(11)

(12) **FURTHER EXAMINATION BY**

(13) **MR. SMALLETS:**

(14) **Q. Dr. Merola, when a Workers' Compensation**  
(15) **case like this comes to you, do you have an intake**  
(16) **form that the patient enters information in that**  
(17) **you then take and review as you're doing your**  
(18) **initial consultation?**

(19) **A. Yes.**

(20) **Q. Do you scan and digitize those intake**  
(21) **forms?**

(22) **A. I typically dictate it. Like I said, I**  
(23) **have -- if it's in my chart it's in an Adobe file**  
(24) **right now, so I can't open that, I'm sorry, if it's**  
(25) **there, but typically there's a form. And then I**

(1) A. MEROLA, M.D.

(2) kind of dictate when I see the patient and then go  
(3) through any questions I may have in order to  
(4) quote-unquote fill in the blanks for the history  
(5) section and past medical history, surgical history,  
(6) all that stuff.

(7) Q. But is the form universally scanned in as  
(8) its completed?

(9) A. You know, it depends. That's a great  
(10) question. It depends on who I happen to have in my  
(11) office at any particular time. It's hard to have,  
(12) you know -- you know what they say about good help  
(13) is hard to find.

(14) Q. Do you see any indication in your files  
(15) that there's a PDF associated with an intake form  
(16) on February 11, 2019 or at any point prior to that  
(17) for this patient?

(18) A. Like I said, I can't -- the IT folks are  
(19) doing this update to Windows 11 right now so I  
(20) can't get into any of the Acrobats.

(21) Q. So you don't even see a file that  
(22) predates the 2/11/19 visit that's in Word format?

(23) A. No, I don't have anything in Word format.  
(24) Just -- the Word formats that I have are my office  
(25) notes.

(1) **A. MEROLA, M.D.**

(2) Q. And the way we got those office notes  
(3) from your office they had file names that were  
(4) associated with looks like the dates of treatment,  
(5) and then it would say the patient's last name,  
(6) first name, O-V. Does that stand for office visit?

(7) **A. Yes.**

(8) Q. Did you rename those file names in  
(9) response to the subpoena or is that how they're  
(10) stored in your system?

(11) **A. You know, I don't know. That would be my**  
(12) **medical records person.**

(13) Q. Is that at one of your two offices?

(14) **A. Yes.**

(15) Q. That's it. I meant to ask that earlier,  
(16) but I forgot.

(17)

(18) FURTHER EXAMINATION BY

(19) **MR. GUMPert:**

(20) Q. Just a followup to that.

(21) Is there a way, because you're not a part  
(22) of this case, but if at some point you're able to  
(23) access those Adobes, would we be able to somehow  
(24) request to get those intake forms or whatever?

(25) **A. Not a problem. Sure. If you guys want**

(1) **A. MEROLA, M.D.**

(2) **to -- like I said, I'm happy to help. I'm here for**  
(3) **your subpoena today. Whatever -- I'm here and**  
(4) **available.**

(5) **MR. SMALLETS: So if we send a separate**  
(6) **subpoena duces tecum, a subpoena for records**  
(7) **to get all of your files, meaning the PDFs**  
(8) **and the Words, regardless of whether you can**  
(9) **open the PDFs, can you send the PDFs to us**  
(10) **electronically with these Word files as well?**

(11) **THE WITNESS: That's a great question.**  
(12) **That would be a question for my IT guy, but I**  
(13) **will certainly look into it for you, of**  
(14) **course, yes.**

(15)  
(16) **FURTHER EXAMINATION BY**

(17) **MR. O'SULLIVAN:**

(18) **Q. Two quick followups.**

(19) **What is your office address again, Dr.**  
(20) **Merola?**

(21) **A. So the main address for all**  
(22) **correspondence, the best address to use is 567 1st**  
(23) **Street, Brooklyn, New York 11215.**

(24) **Q. And where is your office in the city**  
(25) **located where you see patients?**

(1) **A. MEROLA, M.D.**

(2) **A. 141 West 28th Street, that's on the fifth**  
(3) **floor. It's between 6th and 7th Avenue.**

(4) **Q. What is the zip?**

(5) **A. You know, that's not a question -- I**  
(6) **never send any mail to myself in Manhattan. Good**  
(7) **question. Give me one second. I'll see if I have**  
(8) **anything with an address on it for you. I think**  
(9) **it's 10001.**

(10) **Q. And where are you now?**

(11) **A. I am there. I'm at 141 West 28th Street.**

(12) **Q. Now, in addition to your reports that**  
(13) **you've looked at today and referred to during your**  
(14) **testimony, does your office maintain a separate,**  
(15) **quote, chart, unquote for Miss Quezada?**

(16) **A. No.**

(17) **Q. I don't have anything further. Thank**  
(18) **you.**

(19) **A. Thanks, guys.**

(20) **MR. GUMPert: Thank you, Doctor, for**  
(21) **everything. I do appreciate it. We may be**  
(22) **sending you further correspondence, but I do**  
(23) **thank you for taking the time.**

(24) **MR. O'SULLIVAN: Hard copy, please.**

(25) **MR. SMALLETS: E-mail copy.**

- (1)
- (2)
- (3)
- (4)
- (5)
- (6)
- (7)
- (8)
- (9)
- (10)
- (11)
- (12)
- (13)
- (14)
- (15)
- (16)
- (17)
- (18)
- (19)
- (20)
- (21)
- (22)
- (23)
- (24)
- (25)

**A. MEROLA, M.D.**

**MR. TEMPLE: E-mail copy only, please.**

**(Time noted: 3:38 p.m.)**

-----

ANDREW MEROLA, M.D.

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

-----

NOTARY PUBLIC

(1)  
(2)  
(3)  
(4)  
(5)  
(6)  
(7)  
(8)  
(9)  
(10)  
(11)  
(12)  
(13)  
(14)  
(15)  
(16)  
(17)  
(18)  
(19)  
(20)  
(21)  
(22)  
(23)  
(24)  
(25)

A. MEROLA, M.D.

----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
ANDREW MEROLA, M.D.	MR. GUMPERT	10, 51,
		56
	MR. TEMPLE	36
	MR. O'SULLIVAN	42, 57
	MR. SMALLETS	51, 54

----- DOCUMENT REQUEST -----

(None)

----- INFORMATION TO BE FURNISHED -----

(None)

----- EXHIBITS -----

(None)

RULINGS

PAGE            LINE

(None)

oOo

(1)  
(2)  
(3)  
(4)  
(5)  
(6)  
(7)  
(8)  
(9)  
(10)  
(11)  
(12)  
(13)  
(14)  
(15)  
(16)  
(17)  
(18)  
(19)  
(20)  
(21)  
(22)  
(23)  
(24)  
(25)

**A. MEROLA, M.D.**

**CERTIFICATE**

I, Randi Vecchione, a Shorthand Reporter  
and Notary Public of the State of New York,  
do hereby certify:

That, ANDREW MEROLA, M.D., the  
witness whose examination is hereinbefore set  
forth, was duly sworn, and that such  
examination is a true record of the testimony  
given by such witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage; and that I am  
in no way interested in the outcome of  
this matter.

  
-----  
Court Reporter

(1) **ERRATA SHEET FOR: ANDREW MEROLA, M.D.**

(2) **ANDREW MEROLA, M.D., being duly sworn, deposes and**  
(3) **says: I have reviewed the transcript of my**  
(4) **proceeding taken on 11/04/2025. The following**  
(5) **changes are necessary to correct my testimony.**

	<b>PAGE</b>	<b>LINE</b>	<b>CHANGE</b>	<b>REASON</b>
(6)	----	----	-----	-----
(7)	----	----	-----	-----
(8)	----	----	-----	-----
(9)	----	----	-----	-----
(10)	----	----	-----	-----
(11)	----	----	-----	-----
(12)	----	----	-----	-----
(13)	----	----	-----	-----
(14)	----	----	-----	-----
(15)	----	----	-----	-----
(16)	----	----	-----	-----
(17)	----	----	-----	-----
(18)	----	----	-----	-----
(19)	----	----	-----	-----
(20)	----	----	-----	-----
(21)	----	----	-----	-----
(22)	----	----	-----	-----

(23) **Witness Signature: \_\_\_\_\_**

**Subscribed and sworn to, before me**  
(24) **this \_\_\_ day of \_\_\_\_\_, 20 \_\_\_.**

\_\_\_\_\_  
(25) **(NOTARY PUBLIC) MY COMMISSION EXPIRES**

<b>A</b>				
<b>AARON (1)</b> 4:7	<b>accompanied...</b> 6:17	17:24 18:2,9	3:8	7:9,10,15
<b>ability (1)</b> 46:16	<b>accumulativ...</b> 32:7	<b>Adobe (3)</b> 20:13 40:4 54:23	<b>Albertson (1)</b> 3:10	8:19,19,22 9:4,7 11:13
<b>able (6)</b> 10:15 33:12 39:4 45:3 56:22,23	<b>ACDF (3)</b> 15:20 28:23,24	<b>Adobes (1)</b> 56:23	<b>ALEX (1)</b> 3:18	11:15,19 12:2 12:13,24
<b>abnormal (1)</b> 38:12	<b>aches (1)</b> 50:2	<b>advance (1)</b> 35:9	<b>ALEXANDE...</b> 3:6	13:12,24 14:18,19,21
<b>about (17)</b> 10:19,20 14:6 19:21 20:23 21:17 29:4 31:5 33:6 34:22 35:8,12 46:14 48:13 52:2 53:9 55:12	<b>Acrobat (1)</b> 20:13	<b>advised (2)</b> 40:13 41:2	<b>all (20)</b> 5:10 6:7,25 8:7 8:10,11,20 9:6,8 16:8 20:14 27:14 32:7,16 50:6 51:12 54:4 55:6 57:7,21	14:22 16:2,9 17:17 18:19 19:19 20:5,8 20:15 22:3,17 23:18 27:10 27:10 29:10 29:10 33:6,22 34:3,22 35:11 35:14,21 36:2 36:4,5,25 37:2,15 39:9 39:13,14,15 39:16,17 40:10,14,24 41:3,10 42:6
<b>above (1)</b> 27:22	<b>Acrobats (1)</b> 55:20	<b>after (12)</b> 8:17 13:11 15:10 18:25 26:4 28:5 37:15 43:7,10 43:13 44:18 47:17	<b>along (2)</b> 15:13 29:2	42:7 44:8,13 44:16 46:13 46:25 48:16 49:3 52:7,16 52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>absolute (1)</b> 15:3	<b>across (2)</b> 26:23 27:2	<b>afternoon (1)</b> 42:15	<b>also (7)</b> 4:10 24:18 33:19 34:10 38:16 40:3 41:24	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accepted (1)</b> 31:17	<b>action (2)</b> 7:13 61:16	<b>again (9)</b> 22:21 28:2 35:21 44:19 46:4 47:17 53:19 54:4 57:19	<b>always (1)</b> 38:18	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>access (3)</b> 20:14 33:21 56:23	<b>activities (1)</b> 46:12	<b>against- (3)</b> 1:5,12,17	<b>and/or (1)</b> 5:10	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accessing (2)</b> 20:13 40:4	<b>actual (1)</b> 44:3	<b>age-related (2)</b> 25:5,12	<b>Andrew (7)</b> 2:3 10:11 59:7 60:4 61:8 62:1,1	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accident (14)</b> 12:11,20 13:25 14:6 15:11,11 16:23 19:2 20:23 30:10 33:10,13 41:5 52:20	<b>actually (2)</b> 10:24 11:2	<b>ago (1)</b> 11:2	<b>another (4)</b> 16:24 17:11 22:21 48:6	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accidents (2)</b> 33:2 52:20	<b>acute (2)</b> 44:24 45:18	<b>agree (1)</b> 10:15	<b>answer (9)</b> 5:12,20 6:7,14 6:16,16,19 11:22 52:5	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accommodat...</b> 11:20	<b>addition (1)</b> 58:12	<b>AGREED (2)</b> 5:3 8:6	<b>answered (2)</b> 6:12 7:4	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
<b>accommodat...</b> 36:5	<b>additional (3)</b> 17:18 37:2 39:25	<b>agreement (2)</b> 36:4,5	<b>anterior (4)</b> 15:20,21 24:14 28:25	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>address (4)</b> 57:19,21,22 58:8	<b>agreements (1)</b> 53:25	<b>any (85)</b> 5:22 6:13,15	52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>addressing (1)</b> 26:21	<b>AGRESTA (2)</b> 1:9 3:21		52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>adjacent (4)</b> 26:21,22 27:18 27:20	<b>ahead (1)</b> 12:18		52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>administerin...</b> 8:15	<b>AHMUTY (1)</b>		52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>admission (2)</b> 18:23 23:2			52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15
	<b>admit (3)</b>			52:17 53:14 53:16,25 54:3 55:3,11,14,16 55:20 58:6 61:15

<b>appearing (1)</b> 10:17	30:19,19 31:11 32:12	33:5,17,18,22 35:24,25 36:9	52:24	2:4 5:11 7:15 11:22,23
<b>appears (1)</b> 47:22	32:13,14,18 33:15,16	36:11 37:7,13 37:21 39:21	<b>B</b>	24:24 37:17 37:25 41:4
<b>apply (1)</b> 5:14	35:16,16,19 38:10,11	40:24 41:4,22 41:23,24 42:2	<b>b (1)</b> 5:9	59:11 62:23
<b>appointment...</b> 34:25	41:14 47:22 48:4 51:9,9	43:20,22 44:8 45:2,4,8 46:7	<b>back (28)</b> 15:25 16:22,25 17:2,9,12	<b>began (2)</b> 25:18 29:18
<b>appreciate (2)</b> 54:7 58:21	52:16,17,17 53:24 54:17	46:9 47:2,22 47:25 48:22	19:2,15 30:24 44:7 46:12,14	<b>behalf (3)</b> 7:18 36:6,7
<b>appreciated ...</b> 11:9 38:10 45:21	55:7 57:10 <b>ascertain (1)</b> 39:5	49:17 50:6 52:5,13 53:14 54:2,9 55:11	46:21 47:4,9 47:11,24 48:2 48:3,12,13,14	<b>believe (4)</b> 12:12 30:25 39:18 52:4
<b>appropriate ...</b> 5:15	<b>Aside (1)</b> 22:4	55:16 56:13 56:22 58:11	48:23 49:25 50:12,20 53:10,11	<b>bend (1)</b> 46:16
<b>approximate...</b> 17:9 18:25	<b>ask (4)</b> 11:12 14:6 15:2 56:15	58:13 <b>ataxia (1)</b> 39:15	<b>BADER (1)</b> 3:4	<b>bending (2)</b> 44:6 46:12
<b>April (6)</b> 43:14,18,23 44:18,22 45:18	<b>asked (2)</b> 51:24 52:2	<b>attending (1)</b> 18:4	<b>band (1)</b> 16:12	<b>best (1)</b> 57:22
<b>area (2)</b> 35:7 38:23	<b>asking (2)</b> 10:18,20	<b>attorney (8)</b> 5:21 6:13,23 7:17,25 9:3 11:7 30:21	<b>bar (1)</b> 7:11	<b>better (6)</b> 27:21 29:19 45:19 46:10 47:3 48:25
<b>areas (2)</b> 21:14,20	<b>assessment (4)</b> 19:7 20:25 21:22 38:7	<b>attorneys (8)</b> 3:4,9,14,20 4:4 5:4 35:5 42:7	<b>based (10)</b> 17:5,15 28:15 31:16 32:2,7 32:8,13,18 39:12	<b>between (7)</b> 5:4 8:7 29:14 29:21 36:23 45:16 58:3
<b>arms (2)</b> 41:11,17	<b>associated (2)</b> 55:15 56:4	<b>attributed (1)</b> 46:20	<b>basically (2)</b> 26:25 31:15	<b>big (1)</b> 22:8
<b>around (4)</b> 23:21 30:25 36:19 52:6	<b>assume (2)</b> 19:17 33:17	<b>attributes (1)</b> 16:23	<b>basis (4)</b> 5:23 6:18 25:19 28:6	<b>billing (2)</b> 33:20 35:12
<b>arthrodesis (1)</b> 27:16	<b>asthma (2)</b> 14:12 19:12	<b>authorizatio...</b> 34:11	<b>basket (1)</b> 22:8	<b>BISGAARD ...</b> 4:4
<b>Article (1)</b> 5:15	<b>at (73)</b> 5:10,21 6:8 7:10,12 8:4 11:13,15,19 16:2,23 18:4 18:18 20:24 22:10 23:18 23:19,21 24:15 25:8,10 25:15 26:7 27:14 28:22 28:23 29:8,11 29:20 32:25	<b>available (1)</b> 57:4	<b>bear (3)</b> 9:8 15:6 22:22	<b>bit (4)</b> 18:8 21:24 36:20 38:19
<b>as (51)</b> 5:20,22 6:14 10:2,5,21,22 11:3,10 12:20 13:2,6,25 14:4 20:9,14 20:14 21:24 21:25 23:2,4 23:24 24:18 26:14 29:18		<b>Avenue (2)</b> 41:25 58:3	<b>because (9)</b> 15:3 16:9 22:12 27:5,6 38:22 40:4 54:5 56:21	<b>black (1)</b> 16:12
		<b>avoid (1)</b> 44:6	<b>become (1)</b> 31:11	<b>blanks (1)</b> 55:4
		<b>aware (6)</b> 17:15,20 39:9 40:20 52:23	<b>before (11)</b>	<b>blood (1)</b> 61:16
				<b>body (2)</b> 21:14 50:2
				<b>both (2)</b>

28:18 37:24 <b>Boulevard (1)</b> 3:16 <b>Box (2)</b> 3:16,23 <b>brace (1)</b> 47:11 <b>brachioradia...</b> 38:13,23 <b>brain (3)</b> 39:13 40:24 41:5 <b>break (2)</b> 11:19,23 <b>breakdown (2)</b> 26:22 27:19 <b>briefly (1)</b> 52:2 <b>BRISBOIS (1)</b> 4:4 <b>Broadway (1)</b> 3:5 <b>Brooklyn (3)</b> 41:22,25 57:23 <b>bunch (1)</b> 33:18 <b>but (28)</b> 7:16 11:17 13:4,13,19 15:6 19:7 20:9,13 30:24 34:11 35:7,9 35:22 36:12 37:15 38:17 49:23 51:25 52:13 53:5,19 54:25 55:7 56:16,22 57:12 58:22 <b>butcher (1)</b> 40:16 <b>by (43)</b> 3:6,11,18,24 4:7 5:3,11,24	5:25 6:17 7:15,19 8:7,9 8:16 9:3,9 10:3,8 11:10 13:3 17:7,18 25:16 27:12 32:14,21 34:12 36:16 40:13 41:2 42:13 43:20 45:13 51:2,20 53:8 54:12 56:18 57:16 60:3 61:12,16 <hr/> <b>C</b> <hr/> <b>c (3)</b> 3:2 4:2 5:9 <b>C.P.L.R (2)</b> 5:16 7:20 <b>C3-4 (3)</b> 25:8 28:22 29:8 <b>C4-5 (4)</b> 26:22,25 29:11 29:20 <b>C4-C5 (2)</b> 29:18 37:13 <b>C5-6 (7)</b> 15:22 24:16 25:15 26:7,11 26:23 28:23 <b>C5-C6 (1)</b> 26:20 <b>call (1)</b> 27:18 <b>called (7)</b> 10:2 26:21 27:3 31:21 34:25 35:3 42:18 <b>came (1)</b> 13:2 <b>cane (1)</b>	47:11 <b>Caption (1)</b> 1:23 <b>care (2)</b> 23:16 46:19 <b>CARIELLO ...</b> 3:13 <b>Carpentry (8)</b> 1:7,9,10,10 3:21,22,22 39:22 <b>carrier (1)</b> 34:8 <b>case (7)</b> 10:19 13:3 32:21 42:8,19 54:15 56:22 <b>cases (2)</b> 36:2 54:3 <b>category (1)</b> 23:10 <b>causal (4)</b> 30:19 31:21 32:18 33:9 <b>causally (2)</b> 30:10 32:8 <b>causation (2)</b> 31:10 33:13 <b>causations (1)</b> 31:10 <b>cause (1)</b> 6:12 <b>caused (1)</b> 17:14 <b>central (1)</b> 39:13 <b>certain (6)</b> 15:12 24:19 32:10 40:4 53:20 54:3 <b>certainly (5)</b> 33:12 35:22 39:8 41:19 57:13	<b>certainty (2)</b> 30:9,19 <b>CERTIFICA...</b> 61:2 <b>certification ...</b> 7:23 <b>certify (2)</b> 61:6,14 <b>cervical (7)</b> 15:21 21:3 24:14 25:15 28:22,25 50:14 <b>CHANGE (1)</b> 62:5 <b>changed (1)</b> 30:23 <b>changes (4)</b> 25:6,6,12 62:3 <b>charge (1)</b> 8:4 <b>chart (6)</b> 18:15 52:21,25 53:6 54:23 58:15 <b>chronic (3)</b> 22:9,11,12 <b>city (3)</b> 41:22 45:13 57:24 <b>civil (2)</b> 35:12,14 <b>CJ (3)</b> 1:7 3:9 42:18 <b>claims (2)</b> 12:11 35:11 <b>clarification ...</b> 51:6 <b>clarify (1)</b> 17:21 <b>clear (4)</b> 5:22 6:17 11:24 28:24 <b>clearly (2)</b>	7:7 48:24 <b>client (1)</b> 32:3 <b>clinical (3)</b> 38:14 39:4 41:8 <b>come (2)</b> 10:14 45:5 <b>comes (4)</b> 15:4 21:17 30:13 54:15 <b>comfortable ...</b> 13:21 <b>comments (1)</b> 6:4 <b>COMMISSI...</b> 62:25 <b>common (2)</b> 21:23 41:10 <b>communicati...</b> 6:25 <b>communicati...</b> 7:6 <b>Comp (4)</b> 31:2,3 33:25 34:6 <b>company (1)</b> 34:2 <b>compensated...</b> 34:4 <b>compensatio...</b> 13:2 30:23 31:12,13,17 33:23 34:7 54:14 <b>complained (1)</b> 17:9 <b>complaining ...</b> 14:2 17:13 19:15 <b>complaints (4)</b> 46:7,13 53:10 53:11 <b>complete (1)</b>
---	--	--	---	---

6:20 <b>completed (1)</b> 55:8 <b>completely (2)</b> 22:6 34:7 <b>compliance (1)</b> 5:5 <b>comport (1)</b> 34:16 <b>compoundin...</b> 39:17 <b>compression ...</b> 23:13,19 25:7 25:10 <b>computers (1)</b> 15:4 <b>concerned (1)</b> 45:7 <b>concerning (3)</b> 38:9,19 39:8 <b>concerns (1)</b> 44:2 <b>condition (5)</b> 15:25 21:11,22 22:9,12 <b>conditions (3)</b> 21:20 22:4 39:9 <b>conduct (1)</b> 9:9 <b>conducted (1)</b> 8:9 <b>confidentiali...</b> 6:9 <b>confirming (1)</b> 8:17 <b>confused (1)</b> 18:16 <b>connected (1)</b> 32:9 <b>Connecticut ...</b> 3:23 <b>connection (3)</b> 31:22 32:18	33:10 <b>consent (2)</b> 7:3 8:20 <b>consequence ...</b> 12:21 27:18 <b>consideratio...</b> 22:2 <b>considered (1)</b> 8:21 <b>constructing ...</b> 30:20 <b>consultation ...</b> 15:23 54:18 <b>contact (1)</b> 42:7 <b>contained (1)</b> 52:18 <b>continued (2)</b> 1:23 48:11 <b>contract (1)</b> 38:25 <b>contraction (1)</b> 38:12 <b>contribute (1)</b> 22:3 <b>control (1)</b> 8:13 <b>controlled (1)</b> 7:21 <b>conversation...</b> 13:22 <b>conversation...</b> 19:20 22:17 47:2 49:19 <b>coordination...</b> 41:12 <b>copy (5)</b> 8:4 9:4 58:24 58:25 59:2 <b>corner (1)</b> 45:16 <b>CORP (3)</b> 1:13,18 4:5 <b>correct (40)</b>	12:3,4 14:15 14:16,24 18:19,20 19:12 22:16 23:16 24:4,12 24:16 25:17 25:22 26:5,12 26:16 28:6,10 29:3,18,21 31:24 32:5,10 32:22 33:14 34:18,24 35:4 37:14 42:21 43:17 45:24 49:22 50:11 53:6,12 62:3 <b>corresponde...</b> 57:22 58:22 <b>costs (1)</b> 9:9 <b>could (6)</b> 15:6 20:20 38:20 39:10 41:13 44:5 <b>counsel (12)</b> 8:3,7,10 9:6 11:16 35:16 35:23 39:22 53:22,22 54:5 54:8 <b>County (2)</b> 1:2 11:4 <b>couple (4)</b> 16:17 35:10 39:20 52:20 <b>couple-page ...</b> 20:22 <b>course (5)</b> 5:25 16:2 34:5 53:14 57:14 <b>court (6)</b> 1:2 6:11 8:10 8:14,16 61:21 <b>Courts (1)</b>	5:6 <b>cover (1)</b> 36:20 <b>covered (1)</b> 36:21 <b>COVID (2)</b> 11:3 42:3 <b>CPLR (3)</b> 5:24 6:15 8:8 <b>crawl (1)</b> 46:17 <hr/> <b>D</b> <hr/> <b>d (4)</b> 5:10 8:8 10:2 60:2 <b>d/b/a (5)</b> 1:7,9,10 3:21 3:22 <b>DANIEL (1)</b> 4:11 <b>date (10)</b> 17:21,23 18:2 18:3,10,23 30:24 41:4 47:18 49:6 <b>dated (1)</b> 23:3 <b>dates (2)</b> 49:11 56:4 <b>day (3)</b> 15:11 59:12 62:24 <b>days (1)</b> 13:13 <b>de (9)</b> 13:3 25:16 26:11 27:12 27:23 29:5 50:13,16,20 <b>deal (1)</b> 22:5 <b>dealt (1)</b> 21:25	<b>December (5)</b> 38:8,8 43:11 43:13 48:7 <b>decision (1)</b> 33:9 <b>deemed (1)</b> 7:19 <b>defect (1)</b> 5:22 <b>Defendant (6)</b> 1:14,19 3:9 4:4 4:5 42:18 <b>Defendant/T...</b> 3:20 <b>Defendants (2)</b> 1:8 10:13 <b>Defendants/...</b> 3:14 <b>deficits (1)</b> 15:23 <b>degree (3)</b> 30:8,18 32:9 <b>DEMERS (1)</b> 3:8 <b>demonstrate ...</b> 25:5 39:16 <b>demonstrate...</b> 15:20 <b>demonstrate...</b> 28:22 <b>Denies (1)</b> 17:3 <b>department (...)</b> 19:15 33:20 45:2,8 <b>depends (2)</b> 55:9,10 <b>deponent (5)</b> 5:20 6:7,14,18 6:25 <b>deposed (1)</b> 10:23 <b>deposes (1)</b> 62:1
---	---	---	---	---

<b>deposing (1)</b> 13:14	54:20	29:15 33:20	<b>electronically (1)</b> 57:10	<b>ESQS (1)</b> 3:8
<b>deposition (10)</b> 2:2 5:10,12,13 5:19 6:8,21 6:24 8:9 9:9	<b>direct (2)</b> 6:14 33:25	34:7 37:7,19 51:23	<b>Elmhurst (9)</b> 15:9 16:4 17:19 18:7,19 18:22 19:2 32:25 41:4	<b>essentially (1)</b> 50:4
<b>depression (2)</b> 16:21 19:14	<b>direction (2)</b> 6:16 33:17	<b>down (8)</b> 17:2 18:8,12 19:5 21:5 26:3 30:14,18	<b>else (8)</b> 13:18 28:17 35:20 36:11 39:19 50:22 52:9,12	<b>evaluation (2)</b> 17:16 24:10
<b>DESIGN (3)</b> 1:7,15 3:15	<b>disc (1)</b> 29:11	<b>Dr (17)</b> 10:12 13:3 25:16 26:11 27:12,23 29:5 36:19 42:15 47:13,23 50:13,16,20 51:4 54:14 57:19	<b>emailed (1)</b> 9:5	<b>even (1)</b> 55:21
<b>details (2)</b> 35:22 54:4	<b>discectomy (3)</b> 15:21 24:15 28:25	<b>duces (1)</b> 57:6	<b>emergency (4)</b> 17:8 19:14 44:25 45:8	<b>event (2)</b> 7:5 31:22
<b>determinatio...</b> 32:17	<b>discharge (5)</b> 17:24 18:2,9 18:24 23:4	<b>duly (3)</b> 10:3 61:10 62:1	<b>EMG (2)</b> 37:2,16	<b>ever (15)</b> 14:19 16:3 17:7,12,17 18:18 19:21 22:18 23:18 40:13,23 41:2 50:19 53:15 53:25
<b>determine (2)</b> 31:21 34:3	<b>discussed (1)</b> 30:14	<b>during (6)</b> 5:18,25 16:2 34:5 53:14 58:13	<b>EMG/NCV (1)</b> 37:6	<b>every (1)</b> 5:18
<b>determining ...</b> 7:3	<b>discussion (1)</b> 14:4	<b>duces (1)</b> 57:6	<b>end (1)</b> 20:25	<b>everything (2)</b> 54:6 58:21
<b>developed (1)</b> 29:17	<b>discussions (4)</b> 43:21 47:21 48:9,22	<b>E</b>	<b>enforce (1)</b> 6:10	<b>evidence (1)</b> 25:5
<b>diagnose (1)</b> 37:25	<b>disposition (1)</b> 36:2	<b>E (8)</b> 3:2,2,20 4:2,2 10:2,2 60:2	<b>English (1)</b> 13:17	<b>Evidently (1)</b> 44:24
<b>diagnosed (2)</b> 22:15,18	<b>Doctor (20)</b> 14:15 15:2 17:4,12 18:16 18:21 19:19 20:4 21:9 27:8 28:7,17 30:7,11 31:6 31:19 34:17 51:24 54:7 58:20	<b>E-mail (2)</b> 58:25 59:2	<b>enough (1)</b> 11:6	<b>exactly (1)</b> 30:24
<b>diagnoses (2)</b> 21:2 22:7	<b>DOCUMEN...</b> 60:10	<b>Earle (1)</b> 3:16	<b>enter (1)</b> 53:25	<b>examination ...</b> 6:3 7:11,14,17 7:18,24 8:4 10:8 32:3 36:16 39:12 42:13,20 50:4 51:2,20 54:12 56:18 57:16 60:3 61:9,11
<b>diagnosis (5)</b> 21:18 30:15 37:23 39:5 41:9	<b>doing (5)</b> 13:21 26:20 36:12 54:17 55:19	<b>earlier (2)</b> 37:22 56:15	<b>entered (1)</b> 36:6	<b>examined (3)</b> 7:15 8:3 10:5
<b>diagnostic (3)</b> 25:3,4 37:16	<b>done (13)</b> 17:22 24:15 25:16 26:7,11 26:19 27:12	<b>EBT (1)</b> 31:3	<b>enters (1)</b> 54:16	<b>examining (1)</b> 6:19
<b>diagnostics (2)</b> 37:3 50:3		<b>ED (1)</b> 18:4	<b>ERRATA (1)</b> 62:1	<b>example (1)</b> 30:25
<b>dictate (2)</b> 54:22 55:2		<b>eight (2)</b> 20:23 21:2	<b>error (1)</b> 5:23	<b>except (3)</b>
<b>dictated (1)</b> 15:18		<b>either (2)</b> 36:6 52:14	<b>especially (1)</b> 31:23	
<b>dictating (1)</b> 13:11			<b>ESQ (6)</b> 3:6,11,18,24 4:7,11	
<b>difficulty (5)</b> 20:12 41:17 46:16,18,19				
<b>digitize (1)</b>				

5:24 6:8,14	17:13	55:4	<b>followups (1)</b>	52:3,11 53:3
<b>exhibit (6)</b>	<b>falls (4)</b>	<b>films (2)</b>	57:18	<b>framed (1)</b>
9:4,5,7 38:21	14:20,22 19:16	24:19 28:16	<b>for (64)</b>	5:19
39:14,15	19:22	<b>find (1)</b>	2:5 3:4,9,14,20	<b>from (25)</b>
<b>exhibits (2)</b>	<b>far (3)</b>	55:13	4:4 5:4,6,15	15:9,19 19:18
9:3 60:16	20:14 35:16	<b>findings (4)</b>	6:24 7:6,7 8:3	20:3,5 22:4
<b>expect (1)</b>	52:17	28:15 39:13	8:7,22 10:4	22:23 23:21
12:5	<b>fax (1)</b>	41:16,16	10:14,16	23:22 31:12
<b>expert (4)</b>	33:21	<b>fine (2)</b>	11:16 15:2	34:9,20 35:18
10:21,22 22:6	<b>February (12)</b>	31:5 37:11	16:17 17:9,22	37:20 40:15
54:3	12:19 13:7,16	<b>finger (1)</b>	22:2,12 27:10	41:15 42:5
<b>EXPIRES (1)</b>	15:17 24:4,10	38:24	27:20 29:19	47:24 48:11
62:25	25:14 28:5	<b>firm (1)</b>	29:23 30:25	48:25 49:4
<b>Explain (1)</b>	36:24 42:5,21	42:17	33:13,15,23	51:12,12,13
26:18	55:16	<b>first (13)</b>	33:24 34:4	56:3
<b>express (1)</b>	<b>feet (2)</b>	10:3 12:19	37:3,9 38:3,6	<b>front (1)</b>
8:20	41:18 47:10	15:15,17	38:24 39:22	12:16
<b>extent (1)</b>	<b>fell (1)</b>	22:15 24:3,11	40:21 41:5	<b>full (1)</b>
5:24	16:23	25:14 28:19	42:18,19,20	24:21
<b>extremely (1)</b>	<b>fellow (1)</b>	42:20 43:23	44:15,25 45:5	<b>funding (1)</b>
11:8	11:16	43:25 56:6	46:17 50:12	34:2
<b>extremities (6)</b>	<b>female (2)</b>	<b>five (2)</b>	55:4,17 56:6	<b>FURNISHE...</b>
17:3 37:7	16:20 19:11	36:14 43:19	57:2,6,12,13	60:13
39:14 47:5,7	<b>few (4)</b>	<b>fixed (1)</b>	57:21 58:8,15	<b>further (14)</b>
47:9	11:11 36:10,18	26:25	58:20,23 62:1	8:25 36:9
<b>eyeballing (1)</b>	42:19	<b>flexor (3)</b>	<b>forgot (1)</b>	37:16 42:10
34:12	<b>fibroid (1)</b>	38:11,17 39:3	56:16	48:16 49:3
	16:21	<b>flexors (3)</b>	<b>form (5)</b>	51:18,20
<b>F</b>	<b>fibromyalgia...</b>	38:12,24,25	5:23 54:16,25	54:12 56:18
<b>fact (4)</b>	21:7,9,11 22:6	<b>floor (2)</b>	55:7,15	57:16 58:17
10:22 14:16	22:15,19 33:4	4:6 58:3	<b>format (2)</b>	58:22 61:14
32:24 45:6	52:24	<b>Fodeman (1)</b>	55:22,23	<b>fused (1)</b>
<b>factors (2)</b>	<b>fifth (2)</b>	54:9	<b>formats (1)</b>	27:17
33:8,11	21:5 58:2	<b>folks (1)</b>	55:24	<b>fusion (4)</b>
<b>failing (1)</b>	<b>file (6)</b>	55:18	<b>forms (2)</b>	15:21 25:15
27:12	12:16 16:7	<b>following (2)</b>	54:21 56:24	27:16 28:25
<b>failure (3)</b>	54:23 55:21	44:14 62:2	<b>forth (3)</b>	
7:9,16 27:15	56:3,8	<b>follows (1)</b>	6:10 7:4 61:10	<b>G</b>
<b>fair (3)</b>	<b>files (4)</b>	10:5	<b>found (1)</b>	<b>gait (1)</b>
34:20 36:7	20:13 55:14	<b>followup (7)</b>	29:7	41:17
45:22	57:7,10	20:19 29:23	<b>four-month (3)</b>	<b>gave (2)</b>
<b>fall (6)</b>	<b>filing (1)</b>	35:6 37:2	19:17,18,22	33:21 34:4
12:21 14:15,17	7:23	43:18 51:5	<b>fracture (6)</b>	<b>general (3)</b>
16:25 17:11	<b>fill (1)</b>	56:20	23:13,19 33:5	32:12,13 40:7

<b>generalized (1)</b> 22:7	<b>got (3)</b> 18:16 34:10	<b>happens (1)</b> 21:23	51:4	3:10
<b>generally (3)</b> 13:13 20:4 43:20	56:2	<b>happy (2)</b> 11:14 57:2	<b>hip (5)</b> 47:12,23,24 48:11 49:2	<b>i/s/h/a (2)</b> 1:10 3:22
<b>generated (1)</b> 26:4	<b>gotten (1)</b> 48:25	<b>hard (3)</b> 55:11,13 58:24	<b>historian (1)</b> 32:21	<b>identical (1)</b> 48:10
<b>get (6)</b> 12:6 20:10,11 55:20 56:24 57:7	<b>grammar (1)</b> 25:7	<b>hardware (1)</b> 26:15	<b>history (23)</b> 12:20 13:8,15 14:5,7,11,12 16:13,19,21 17:5 18:13 19:12 23:7 27:6 32:4,15 32:20 33:4,7 55:4,5,5	<b>identity (1)</b> 8:17
<b>getting (2)</b> 46:10 47:3	<b>great (4)</b> 26:19 30:22 55:9 57:11	<b>Hartford (1)</b> 3:23	14:5,7,11,12 16:13,19,21 17:5 18:13 19:12 23:7 27:6 32:4,15 32:20 33:4,7 55:4,5,5	<b>if (42)</b> 6:12,18 11:12 11:15,19,21 13:14,17,22 14:23 15:5,5 15:6 18:12,22 19:5 22:8 28:12 30:24 31:9,23 33:24 35:6,9 36:2 36:11,13,13 37:4 49:11 51:25 52:11 52:19,23,24 53:4 54:23,24 56:22,25 57:5 58:7
<b>give (2)</b> 36:13 58:7	<b>greatly (1)</b> 11:9	<b>having (3)</b> 10:3 18:18 46:11	<b>hit (1)</b> 42:3	31:9,23 33:24 35:6,9 36:2 36:11,13,13 37:4 49:11 51:25 52:11 52:19,23,24 53:4 54:23,24 56:22,25 57:5 58:7
<b>given (12)</b> 5:12 15:12 16:3 17:17 20:5 32:20,24 32:24 33:2,4 44:10 61:12	<b>grounds (1)</b> 7:4	<b>headaches (1)</b> 50:2	<b>Hoffman's (2)</b> 38:16 39:2	28:12 30:24 31:9,23 33:24 35:6,9 36:2 36:11,13,13 37:4 49:11 51:25 52:11 52:19,23,24 53:4 54:23,24 56:22,25 57:5 58:7
<b>giving (1)</b> 33:7	<b>group (1)</b> 50:17	<b>Health (1)</b> 18:6	<b>honestly (1)</b> 13:19	<b>ii (1)</b> 6:9
<b>go (12)</b> 11:11 12:18 13:24 16:8 18:12,22 19:5 25:13 30:24 50:20 54:5 55:2	<b>guidelines (4)</b> 30:23 31:12,14 31:17	<b>hear (1)</b> 11:15	<b>hospital (10)</b> 15:10 16:4,11 17:19 18:19 18:22 32:25 41:4 45:2,9	<b>iii (1)</b> 6:11
<b>going (18)</b> 10:18,20 11:12 15:2,4 19:25 20:2 22:21 24:6 26:3 28:2 35:7 37:3 39:19 40:16 41:15 47:6 51:24	<b>Gumpert (9)</b> 3:24 10:9,12 17:23 37:22 51:21 56:19 58:20 60:4	<b>heard (1)</b> 40:18	<b>Hospitals (1)</b> 18:7	<b>illness (3)</b> 16:13,19 18:13
	<b>guy (1)</b> 57:12	<b>help (2)</b> 55:12 57:2	<b>house (4)</b> 35:23 53:22 54:5,8	<b>illnesses (1)</b> 39:10
	<b>guys (4)</b> 36:12,14 56:25 58:19	<b>helpful (2)</b> 11:8 47:4	<b>how (5)</b> 12:25 13:25 34:3 49:12 56:9	<b>imaging (2)</b> 25:4 28:21
	<hr/> <b>H</b> <hr/>	<b>here (11)</b> 10:21,22 11:24 12:2 15:5 18:16 22:22 24:2 29:10 57:2,3	<b>Hospitals (1)</b> 18:7	<b>imbecile (1)</b> 15:3
	<b>Hall (1)</b> 45:13	<b>hereby (4)</b> 7:13,24 8:6 61:6	<b>hygiene (1)</b> 46:20	<b>IMEs (1)</b> 20:10
	<b>hand (4)</b> 25:13,13 38:12 38:24	<b>herein (3)</b> 5:5 7:15 8:3	<b>hypercholest...</b> 14:13	<b>important (1)</b> 33:8
	<b>handled (1)</b> 54:6	<b>hereinbefore...</b> 61:9	<b>hyperreflexi...</b> 38:18 39:15	<b>impression (1)</b> 37:9
	<b>hands (2)</b> 41:18 54:6	<b>herniation (2)</b> 28:22 29:7	<hr/> <b>I</b> <hr/>	<b>improper (1)</b> 6:12
	<b>Hang (1)</b> 38:3	<b>herself (1)</b> 40:14	<b>I.U (1)</b>	
	<b>happen (1)</b> 55:10	<b>hi (3)</b> 16:21 42:16		

<b>improved (1)</b> 45:23	61:17	12:10 17:14	41:15 44:2	<b>its (1)</b> 55:8
<b>in (125)</b> 5:5,23 6:3,10 6:15 7:4,5 8:11,16,18,21 8:22 9:6,8,9 10:13 11:3,25 12:11,11,16 12:23 13:2,8 13:17,22 14:24 15:16 16:11,12 17:3 19:19,20,21 20:15 21:13 21:23 22:6,8 22:11,17 23:6 23:15 24:21 25:12,13,16 26:15 27:19 29:15 31:3,9 31:10,11,13 31:15,15,20 32:21 33:7,8 33:12,20 35:8 35:11 37:21 37:23 38:8 39:14,23,25 40:2,7,9,9,24 41:6,9,11,22 41:22,24,25 42:3,8,19 43:15 45:5,11 46:4 47:9 48:18,18 49:6 49:11,12,14 50:6 51:5,7 52:3,11,21,25 53:5,6 54:2,6 54:16,23,23 55:3,4,7,10 55:14,22,23 56:8,10 57:24 58:6,12 61:17	<b>INC (10)</b> 1:7,7,9,10,10 1:15 3:15,21 3:22,22 <b>include (2)</b> 5:22 25:6 <b>included (6)</b> 14:5 34:13,14 37:24 39:25 41:9 <b>including (1)</b> 17:18 <b>increased (1)</b> 29:20 <b>independent ...</b> 12:13 52:16 <b>Index (1)</b> 1:5 <b>indicate (5)</b> 22:14 33:23 40:23 44:12 50:19 <b>indicated (4)</b> 32:14 44:4 46:10 47:4 <b>indication (4)</b> 13:4 14:21 38:18 55:14 <b>indicators (3)</b> 38:14 39:4,11 <b>induced (1)</b> 21:16 <b>infection (2)</b> 40:24 41:6 <b>information ...</b> 32:14 54:16 60:13 <b>initial (8)</b> 13:6 15:23 17:16 24:10 28:5 36:23 50:13 54:18 <b>injuries (6)</b>	30:9 31:22 33:10 39:10 <b>injury (2)</b> 31:18,23 <b>Institute (1)</b> 15:20 <b>intake (7)</b> 12:24 15:17 17:16 54:15 54:20 55:15 56:24 <b>interested (1)</b> 61:17 <b>interesting (1)</b> 33:11 <b>interfere (1)</b> 6:4 <b>interim (1)</b> 43:15 <b>interrupt (1)</b> 6:24 <b>interrupted (1)</b> 26:17 <b>interview (2)</b> 13:15 32:3 <b>into (12)</b> 13:24 30:24 33:12 36:6 47:5,6,9 48:4 48:15 53:25 55:20 57:13 <b>inverted (3)</b> 38:11,17 39:3 <b>involved (2)</b> 31:24 35:11 <b>irregularity (...)</b> 5:23 <b>issue (1)</b> 48:24 <b>issued (1)</b> 10:14 <b>issues (6)</b> 35:17,19 39:17	<b>it (70)</b> 5:3 8:6,25 11:2 11:14 14:23 14:24 15:3,6 16:12,19 17:23 18:4 19:2,7,10 20:19,25 21:16 22:3,8 22:8,10,11,12 22:16 23:3,13 23:23 24:10 24:14,24 25:2 25:3 26:15,24 27:3,17 30:17 30:25 33:25 33:25 34:12 34:12,20 35:25 42:11 45:22 47:22 48:4,20,23 49:21 50:13 52:7,9,13 53:4,19 54:2 54:22 55:9,10 55:18 56:5,15 57:12,13 58:8 58:21 <b>it's (34)</b> 13:9,10 16:17 18:13,15 20:18,22 21:18,21,22 21:24,25 22:5 22:6,11 25:2 27:5,15 31:5 31:19,19 32:8 34:6 35:9 38:22 41:18 45:15 52:18 54:23,23,24 55:11 58:3,9	<b>itself (1)</b> 44:3 <hr/> <b>J</b> <hr/> <b>JA (6)</b> 1:7,9,10 3:21 3:22 39:22 <b>JAC (3)</b> 1:7,10 3:22 <b>JAMES (2)</b> 1:9 3:21 <b>January (4)</b> 37:8 49:4,6,7 <b>job (2)</b> 51:12,13 <b>July (2)</b> 43:3 46:24 <b>jump (1)</b> 24:2 <b>June (1)</b> 46:3 <b>just (36)</b> 10:18 11:24 12:14 13:13 19:10 20:4 21:16,25 23:12,21 24:2 24:25 25:9 26:25 28:19 28:24 31:7 34:12,22 35:9 35:18 36:20 42:19 43:25 48:4 50:12 51:5,6,13,22 51:25 52:19 53:18,23 55:24 56:20 <hr/> <b>K</b> <hr/> <b>keep (1)</b> 16:9 <b>KENDRA (6)</b>

1:7,7,15,15 3:15,15 <b>kept (1)</b> 33:20 <b>kicking (1)</b> 11:3 <b>kind (7)</b> 15:24 22:7,10 22:12 38:17 45:15 55:2 <b>know (37)</b> 10:23 11:14,17 11:20 13:2,12 13:14,17,19 15:5 16:5,5 20:4,9,14 21:23 22:3 27:15,20 32:15 33:24 35:6,17,21,24 39:22,24 41:14 45:13 52:17 54:4 55:9,12,12 56:11,11 58:5 <b>known (1)</b> 38:11	<b>law (2)</b> 3:20 8:21 <b>lawsuits (2)</b> 35:13,15 <b>lawyer (1)</b> 54:6 <b>LBP (1)</b> 16:22 <b>lead (2)</b> 39:10,18 <b>leading (1)</b> 41:16 <b>least (3)</b> 32:25 33:22 54:2 <b>led (1)</b> 39:5 <b>left (6)</b> 16:25 17:2,2 17:11 19:16 47:12 <b>leg (3)</b> 17:2 19:16 47:10 <b>legal (1)</b> 12:2 <b>LegalView/Z...</b> 8:13 <b>legs (3)</b> 41:18 48:4,15 <b>LEONOR (1)</b> 1:3 <b>LESPERAN...</b> 3:20 <b>let (6)</b> 11:11,13,17,20 24:2 48:23 <b>let's (7)</b> 12:13 30:21 35:25 43:3 44:15 46:9 47:8 <b>level (8)</b> 23:20 26:7,23	27:16,22,23 29:8,11 <b>levels (1)</b> 25:11 <b>LEWIS (1)</b> 4:4 <b>Lexitas (1)</b> 8:14 <b>lift (1)</b> 46:16 <b>lifting (2)</b> 44:6 46:12 <b>like (17)</b> 19:2 23:3 34:13 35:3 36:10,12 38:10 41:10 46:11 48:20 49:11 52:19 54:15,22 55:18 56:4 57:2 <b>limitation (1)</b> 6:10 <b>line (3)</b> 21:2 60:21 62:5 <b>lines (2)</b> 16:17 29:2 <b>list (1)</b> 49:10 <b>listed (1)</b> 41:19 <b>lists (1)</b> 24:14 <b>litigation (5)</b> 8:23 31:23 34:2 35:11,13 <b>litigations (3)</b> 35:15 53:21,25 <b>little (3)</b> 18:8 21:24 36:19 <b>LLB (1)</b>	16:25 <b>LLC (5)</b> 1:7,7,15 3:9,15 <b>LLP (2)</b> 3:4 4:4 <b>located (2)</b> 45:12 57:25 <b>location (1)</b> 42:2 <b>locations (1)</b> 8:11 <b>long (3)</b> 11:2 12:5 46:17 <b>longer (3)</b> 16:10 36:3 53:20 <b>look (6)</b> 22:10 36:11 38:3 45:4 52:13 57:13 <b>looked (4)</b> 33:18 38:10 52:5 58:13 <b>looking (8)</b> 23:21 33:12 37:21 38:6,24 39:21 43:20 44:15 <b>looks (6)</b> 19:2 23:3 34:12 46:11 48:20 56:4 <b>loss (1)</b> 41:11 <b>lot (1)</b> 22:11 <b>louder (1)</b> 11:18 <b>low (11)</b> 16:22,25 17:2 17:9 46:11 47:4,24 48:3 48:14,23	49:24 <b>lower (18)</b> 17:12 19:5 39:14 45:2,8 45:9,11 46:14 46:21 47:5,7 47:9 48:2,12 48:13 53:10 53:11,16
				<b>M</b>
				<b>M (1)</b> 10:2 <b>M.D (60)</b> 2:3 10:1,2,11 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1,7 60:1,4 61:1,8 62:1,1
				<b>M79.7 (1)</b> 21:5 <b>made (2)</b>

5:10 28:10 <b>Magnetic (1)</b> 28:21 <b>magnificatio...</b> 38:21 <b>mail (1)</b> 58:6 <b>main (1)</b> 57:21 <b>mainly (1)</b> 21:11 <b>maintain (1)</b> 58:14 <b>make (6)</b> 6:3 7:12 26:24 32:17 43:25 46:13 <b>making (2)</b> 33:9 53:10 <b>Management...</b> 20:3,6 37:8 <b>Management...</b> 33:3 <b>mandated (1)</b> 31:19 <b>Manhattan (8)</b> 41:24 42:3 45:2,8,9,11 46:4 58:6 <b>manifested (1)</b> 39:7 <b>manner (1)</b> 8:19 <b>many (1)</b> 49:12 <b>March (10)</b> 12:11,21 14:2 14:17 17:24 17:24 19:18 25:21 36:25 37:18 <b>Maria (3)</b> 1:3 12:7 16:20 <b>marked (1)</b>	9:3 <b>marriage (1)</b> 61:16 <b>MATOS (1)</b> 3:13 <b>matter (3)</b> 10:13 51:5 61:18 <b>maybe (2)</b> 51:15 52:12 <b>McMANUS ...</b> 3:8 <b>me (26)</b> 10:24 11:10,11 11:14,15,16 11:17 13:9,10 14:12 15:6 16:16 21:9 22:22 23:12 24:2 32:14 33:17 36:14 37:9 39:18 48:23 53:21 58:7 59:11 62:23 <b>mean (5)</b> 21:18 27:7 51:11,15 52:15 <b>meaning (1)</b> 57:7 <b>meant (1)</b> 56:15 <b>mechanical (4)</b> 16:25 17:11 19:16,21 <b>mechanics (1)</b> 14:15 <b>medical (19)</b> 10:19,21 14:6 14:11 15:9,12 15:16,19 17:18 19:11 23:7 30:8,19	32:4,9,19 34:4 55:5 56:12 <b>meeting (2)</b> 8:13 13:15 <b>memory (1)</b> 13:12 <b>mention (2)</b> 23:23,25 <b>mentioned (1)</b> 49:8 <b>mentioning (1)</b> 31:3 <b>Merola (65)</b> 2:3 10:1,11,12 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1,19 37:1 38:1 39:1 40:1 41:1 42:1,15 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1,4 52:1 53:1 54:1,14 55:1 56:1 57:1,20 58:1 59:1,7 60:1,4 61:1,8 62:1,1 <b>met (1)</b> 13:16 <b>middle (2)</b>	16:11 23:6 <b>mild (1)</b> 37:12 <b>minimal (1)</b> 41:15 <b>minutes (2)</b> 36:10,14 <b>misbehave (1)</b> 29:19 <b>misbehaves (1)</b> 27:21 <b>Miss (31)</b> 12:25 13:14 15:13 16:3 19:19 20:6 22:17 23:15 24:3,11 33:23 34:5,23 36:23 37:25 40:11 40:14 41:2,21 42:6,21,25 44:13 45:17 45:25 47:2,17 50:6,19 53:15 58:15 <b>Moe (1)</b> 54:9 <b>moment (1)</b> 50:12 <b>month (2)</b> 16:22 17:10 <b>months (1)</b> 20:23 <b>more (6)</b> 17:13 21:23 35:7 41:10,16 53:18 <b>morning (1)</b> 17:24 <b>most (2)</b> 38:7 51:12 <b>motion (2)</b> 7:12 44:7 <b>Mount (2)</b>	22:23 33:5 <b>Moura (7)</b> 13:4 25:16 27:13,23 50:13,16,20 <b>Moura's (2)</b> 26:11 29:5 <b>move (2)</b> 7:10 36:19 <b>Mr (22)</b> 10:9 17:21,23 18:8 36:17 37:22 42:14 51:3,21 53:9 54:13 56:19 57:5,17 58:20 58:24,25 59:2 60:4,6,7,8 <b>MRI (3)</b> 24:19,25 29:7 <b>MRIs (2)</b> 28:13 32:19 <b>much (2)</b> 48:10 52:13 <b>multiple (3)</b> 21:13,13,20 <b>musculoskel...</b> 21:12,20 <b>my (31)</b> 10:12 11:16 12:15,19 15:16 16:8 20:11,14,15 21:24 23:21 30:24 34:18 35:16,23 36:11 37:3 38:6 42:17 51:24 52:9,18 54:5,23 55:10 55:24 56:11 57:12 62:2,3 62:25 <b>myelopathy (...)</b>
--	---	--	---	--

37:24,25 38:15 39:6 41:9,14,14 <b>myself (1)</b> 58:6	11:17 33:6 52:14 58:6 <b>new (15)</b> 1:2 2:5 3:5,5 3:10,17 4:6,6 10:4 15:19 18:6 30:22 45:20 57:23 61:5 <b>next (11)</b> 1:23 17:23 42:23,25 43:4 43:7,10,12 44:21 45:25 46:22 <b>NICOLE (1)</b> 3:20 <b>no (43)</b> 1:5 8:4 11:7 14:3,22 17:16 19:24 21:6 22:20 23:23 23:24 29:13 31:8,9 34:25 35:2,17,19 36:3,9,13 37:11,19 38:22 40:12 40:18,20,25 41:7 42:9 44:2 45:19,20 50:8,18,21 51:18 53:17 53:20,23 55:23 58:16 61:17 <b>None (4)</b> 60:11,14,17,22 <b>Nonparty (1)</b> 2:3 <b>normal (1)</b> 25:5 <b>not (47)</b> 5:20 6:3,13,14	6:16,18,23 7:4,11,18 8:18,22 10:20 10:21 11:25 14:3,21 17:15 17:20 19:24 20:8 22:5,6 22:16,20 23:24 27:14 27:15 29:13 34:22 36:20 39:14,25 40:18,20 44:12 49:23 50:8,20 52:15 52:18 53:5 54:3 56:21,25 58:5 61:14 <b>Notary (6)</b> 2:4 7:15 10:3 59:14 61:5 62:25 <b>note (13)</b> 15:16 18:4 20:18,24 23:22,23,24 23:25 24:19 25:12 28:10 34:13 38:6 <b>noted (5)</b> 5:11 25:8,10 51:7 59:3 <b>notes (20)</b> 12:15 16:8 17:5 20:14,15 23:21 30:11 30:17,25 31:11 33:22 36:11 38:6 39:21,25 40:7 51:25 52:18 55:25 56:2 <b>notice (1)</b> 31:9	<b>November (16)</b> 1:20 20:19 34:14,21,21 37:20 43:9 49:5,9,15,16 49:17,20,21 49:22 50:9 <b>now (14)</b> 17:5 18:21 19:5 25:9,14 39:20 42:20 47:14 48:23 53:8 54:24 55:19 58:10 58:12 <b>number (2)</b> 33:21 50:3 <b>numbness (4)</b> 17:3 41:11 47:10,14	<b>occurring (2)</b> 12:21 14:17 <b>October (3)</b> 23:22 47:19 51:10 <b>of (239)</b> 1:2,2,2 2:2,5 3:20 5:5,9,14 5:15,21,23,25 6:9,10,20,24 7:5,12,13,17 7:19,20,24,24 8:4,14,20,21 9:4,6,7,9 10:4 10:13 12:11 12:14,16,20 12:21,21,24 13:4,6,7,12 13:16,24 14:2 14:2,4,12,15 14:17,20,22 15:11,13,17 15:21,24 16:2 16:7,13,17,19 16:21 17:9,15 17:20 18:5,13 18:21,21,23 18:24,24 19:6 19:15,18,19 20:9,9,13,14 20:15,18,19 20:24 21:14 21:24 22:4,7 22:7,10,11,12 22:17 23:3,4 23:6,13,15,22 23:23 24:4,16 24:18,21 25:2 25:5,11,15,22 26:14 27:6,6 27:11,12,15 27:18,20 28:3 28:9,16,19,21 29:11,13,14	
<hr/> <b>N</b> <hr/>					
<b>N (4)</b> 3:2 4:2 10:2 60:2 <b>N-E-U-R-O-...</b> 40:22 <b>name (6)</b> 10:10,12 42:17 54:9 56:5,6 <b>names (2)</b> 56:3,8 <b>narrative (2)</b> 30:20 31:20 <b>NCV (2)</b> 37:2,16 <b>necessarily (1)</b> 53:5 <b>necessary (2)</b> 13:22 62:3 <b>neck (6)</b> 15:24 44:7 46:10 47:3 48:24 49:23 <b>need (3)</b> 8:15 11:19,22 <b>needles (1)</b> 47:10 <b>nervous (1)</b> 39:13 <b>Neuro (1)</b> 40:18 <b>neurocystice...</b> 40:17,19 41:6 <b>neurological ...</b> 15:22 39:17 <b>neurological...</b> 50:5 <b>never (4)</b>					
			<hr/> <b>O</b> <hr/>		
			<b>O (1)</b> 10:2 <b>O'Sullivan (8)</b> 3:11 17:21 42:14,17 53:9 57:17 58:24 60:7 <b>O-V (1)</b> 56:6 <b>oath (1)</b> 8:15 <b>object (1)</b> 7:9 <b>objection (2)</b> 5:18 7:12 <b>objections (2)</b> 5:10,14 <b>obviously (3)</b> 14:23 27:22 35:5 <b>occurred (1)</b> 13:25		

29:19,22,25	42:4 46:5	<b>one (20)</b>	<b>orthopedics (...)</b>	60:3,21 62:5
30:8,18 31:7	52:5 55:11,24	10:13 16:22	22:3	<b>pages (2)</b>
31:17,22 32:3	56:2,3,6	17:9,13 21:5	<b>other (13)</b>	16:10 20:17
32:9,16,18,19	57:19,24	22:7 23:9	5:23 14:16	<b>pain (28)</b>
32:20 33:4,6	58:14	24:2 27:22	27:19 35:5	16:22,23,24
33:10,12,18	<b>officer (2)</b>	30:3 32:25	37:19 39:9,13	17:2,9,10
33:18 34:5,15	5:11 8:15	35:7 37:12,19	39:17 40:7,10	19:15,16 20:3
34:21,21	<b>offices (1)</b>	38:3,9,14	41:8,10 51:16	20:6 21:12,21
35:10,20 36:2	56:13	53:18 56:13	<b>otherwise (4)</b>	33:3 37:7
36:2,3,3,4,5	<b>often (1)</b>	58:7	8:23 9:6 45:4	44:24 45:6,18
37:6,8,18,20	21:19	<b>ones (1)</b>	50:5	47:4,8 48:3
38:2,8,9,9,12	<b>old (2)</b>	39:7	<b>our (1)</b>	48:14,15,24
38:14,14,17	16:20 19:11	<b>only (11)</b>	22:4	49:23,23,24
38:18 39:5,9	<b>on (69)</b>	11:6,20 13:9	<b>out (3)</b>	49:25,25
39:20 40:4,10	1:23 6:18 7:4	16:17 31:14	19:22 31:7	<b>palpable (1)</b>
40:11,14,18	7:17 12:21	32:17 35:7	53:24	21:13
40:20 41:3,4	13:7,16 14:17	37:19 42:3	<b>outcome (1)</b>	<b>paragraph (1)</b>
41:11,15,19	15:15,17	46:15 59:2	61:17	24:21
41:19 42:5,7	16:10,11 17:5	<b>onset (1)</b>	<b>outside (1)</b>	<b>paraparesis (...)</b>
42:20 43:3	17:15,22	45:20	21:24	39:16
44:18,23	18:12 20:24	<b>onto (3)</b>	<b>over (4)</b>	<b>parasitic (2)</b>
45:16 46:18	21:2 23:23,25	16:25 17:11	19:17,22 42:11	40:24 41:5
46:25 47:6,19	24:4,7,16,22	32:8	45:13	<b>parcel (1)</b>
47:20 48:8,20	25:14,18,21	<b>oOo (1)</b>	<b>overt (1)</b>	25:11
49:5,8,18	25:24 26:11	60:25	41:16	<b>Park (2)</b>
50:3,16 51:7	27:24 28:6,9	<b>open (3)</b>	<b>Ovington (1)</b>	41:25 42:2
52:3,6,17,17	28:15 29:13	11:21 54:24	3:16	<b>part (13)</b>
52:20,23,24	29:23 30:17	57:9	<b>own (2)</b>	13:6 14:4
53:10,14,16	31:16 32:2,7	<b>operation (1)</b>	9:8 51:13	16:12 20:9
53:24,24 54:2	32:13,18 36:6	37:17	_____	24:18 25:11
55:2,20 56:4	36:24,25 37:8	<b>operative (2)</b>	<b>P</b>	26:14 36:3
56:13,22 57:7	37:17,22 38:3	25:24 37:21	<b>P (4)</b>	41:19 50:16
57:8,13 59:12	38:8,13,22	<b>opinion (4)</b>	3:2,2 4:2,2	53:24 54:2
61:5,5,11,15	39:12,19	10:21 15:24	<b>p.m (2)</b>	56:21
61:17 62:2,24	42:21,23 43:4	30:18 32:8	1:21 59:3	<b>participating...</b>
<b>off (1)</b>	43:16 45:16	<b>opposed (1)</b>	<b>P.O (2)</b>	8:12
51:24	45:18 46:18	30:20	3:16,23	<b>particular (1)</b>
<b>office (24)</b>	48:4 49:17	<b>order (3)</b>	<b>page (18)</b>	55:11
3:20 10:14	50:9 54:3	6:10 31:15	1:23 16:11	<b>particularly ...</b>
13:8 20:18	55:10,16 58:2	55:3	18:5,12,14,21	13:10
28:10 30:11	58:8 62:2	<b>original (2)</b>	18:23 19:6	<b>parties (7)</b>
30:17 33:17	<b>once (4)</b>	7:17,24	20:17,24 21:2	5:4,8 6:25 8:7
34:13,14	10:24 35:21	<b>orthopedic (2)</b>	23:6 24:22	8:20 9:8
41:22,23,24	48:18 54:4	21:25 22:4	28:12 30:3	61:15

<b>party (2)</b> 6:19 53:20	51:15	<b>PLUDWIN (1)</b> 3:13	9:5 44:25 45:7	6:14 7:19
<b>past (5)</b> 14:6 19:11 23:7 32:4 55:5	<b>period (4)</b> 19:17,18,23 23:22	<b>point (8)</b> 18:19 23:18 35:24,25 40:24 53:14 55:16 56:22	<b>presenting (1)</b> 9:3	32:14 39:23 40:2,9
<b>pathology (1)</b> 29:11	<b>periods (1)</b> 46:17	<b>points (1)</b> 21:13	<b>presents (2)</b> 16:21 19:14	<b>providers (2)</b> 40:15 41:3
<b>patience (1)</b> 15:3	<b>permitted (1)</b> 5:24	<b>poor (1)</b> 25:7	<b>preserve (1)</b> 6:8	<b>provision (1)</b> 5:9
<b>patient (14)</b> 13:11 16:22 17:16 30:5 31:16 32:21 34:19 38:20 44:5 45:3 48:9 54:16 55:2,17	<b>person (4)</b> 5:14 6:13 12:14 56:12	<b>portion (1)</b> 19:5	<b>pretty (2)</b> 48:10 52:13	<b>proviso (1)</b> 11:21
<b>patient's (4)</b> 16:7 30:9 32:15 56:5	<b>personal (3)</b> 31:23 46:19 53:22	<b>possession (2)</b> 9:6 40:10	<b>previous (3)</b> 27:6,15 48:5	<b>proximate (1)</b> 38:7
<b>patients (5)</b> 13:10 21:12,19 42:2 57:25	<b>persons (1)</b> 6:3	<b>possible (2)</b> 27:10 52:10	<b>previously (4)</b> 13:3 24:15 36:20 40:15	<b>Public (6)</b> 2:4 7:16 10:4 59:14 61:5 62:25
<b>payment (1)</b> 34:2	<b>physical (5)</b> 44:5,8,11,13 44:16	<b>post (3)</b> 19:16 20:23 28:23	<b>primary (2)</b> 47:25 48:24	<b>pull (2)</b> 46:17 48:23
<b>PC (1)</b> 20:3	<b>physician (1)</b> 12:7	<b>postoperativ...</b> 37:20 43:22,23	<b>principal (2)</b> 32:12,13	<b>purpose (3)</b> 6:24 8:22 44:23
<b>PDF (1)</b> 55:15	<b>Pins (1)</b> 47:10	<b>postop (3)</b> 37:20 43:22,23	<b>prior (8)</b> 9:6 14:20,22 32:15 33:2 52:19,20 55:16	<b>pursuant (4)</b> 2:3 5:15 8:8 34:10
<b>PDFs (4)</b> 40:4 57:7,9,9	<b>place (1)</b> 13:17	<b>postoperativ...</b> 37:23 44:11 50:3	<b>privilege (1)</b> 6:9	<b>purview (1)</b> 21:24
<b>pending (3)</b> 35:17,19 47:12	<b>plainly (1)</b> 6:11	<b>postsurgicall...</b> 44:4	<b>problem (5)</b> 11:17 31:8 40:3 48:2 56:25	<b>push (1)</b> 46:16
<b>percent (3)</b> 30:5 33:13 51:8	<b>Plaintiff (9)</b> 1:4,16 3:4,21 17:7 40:13 43:13,22 51:8	<b>Precise (4)</b> 1:13,18 4:5 51:4	<b>procedure (1)</b> 27:3	<b>put (9)</b> 22:8 26:15,25 30:17 31:14 35:25 52:21 52:25 53:4
<b>perform (2)</b> 51:16 53:15	<b>plaintiff's (1)</b> 36:7	<b>predates (1)</b> 55:22	<b>proceed (1)</b> 5:13	<b>putting (1)</b> 46:18
<b>performed (5)</b> 25:21 27:3 36:25 37:17 43:15	<b>Plaintiffs (2)</b> 1:11 3:14	<b>prejudice (1)</b> 6:13	<b>proceeding (1)</b> 62:2	
<b>perhaps (1)</b>	<b>plan (3)</b> 19:8 24:25 30:15	<b>preliminary ...</b> 13:15	<b>prognosis (1)</b> 30:15	<b>Q</b>
	<b>plate (2)</b> 26:23 27:2	<b>preoperative...</b> 37:23 38:7	<b>pronunciatio...</b> 40:16	<b>Q (211)</b> 10:10,12 11:2 11:6,10 12:5 12:10,16,18 12:23 13:6,12 13:21,24 14:4 14:9,14,19,23 15:2,8 16:2,9
	<b>please (5)</b> 10:10 11:22 30:4 58:24 59:2	<b>prescribe (1)</b> 44:8	<b>protocol (1)</b> 20:10	
		<b>present (5)</b> 4:10 8:7 16:13 16:19 18:13	<b>provide (1)</b> 8:3	
		<b>presented (3)</b>	<b>provided (6)</b>	

16:15,18 17:4	49:3,6,8,12	43:2 44:13	<b>reasonable (3)</b>	51:13
17:17 18:2,6	49:14,17,21	45:17 46:2	30:8,18 32:9	<b>recovering (3)</b>
18:9,12,16,21	50:6,9,12,16	47:2,17 50:6	<b>recall (6)</b>	47:24 48:11,25
19:5,10,14,25	50:19,22 51:4	50:19 53:15	13:19 17:20	<b>redo (1)</b>
20:17,22 21:5	51:15,18,22	58:15	18:18 19:24	27:5
21:7,9,15	52:9,19,24	<b>quick (3)</b>	20:8 22:20	<b>reexamine (1)</b>
22:8,14,17,21	53:3,8,14,18	51:5,6 57:18	<b>received (2)</b>	45:3
23:2,6,9,12	54:7,14,20	<b>quickly (3)</b>	18:18 33:24	<b>refer (4)</b>
23:15,18 24:2	55:7,14,21	11:12 19:10	<b>recent (1)</b>	12:14 35:15,23
24:6,10,14,18	56:2,8,13,15	34:12	51:12	51:9
24:21,24 25:9	56:20 57:18	<b>quote (1)</b>	<b>recently (1)</b>	<b>reference (3)</b>
25:14,18,21	57:24 58:4,10	58:15	51:9	29:10 37:3
25:24 26:3,7	58:12,17	<b>quote-unquo...</b>	<b>recognize (1)</b>	52:7
26:9,11,14,18	<b>Queens (3)</b>	27:16 55:4	5:8	<b>referenced (1)</b>
27:3,7,10,22	1:2 11:4 22:24		<b>recollection (...)</b>	39:20
28:2,5,9,12	<b>question (21)</b>	<b>R</b>	12:14 16:7	<b>referred (5)</b>
28:15,19,24	6:11,19 7:3,10	<b>R (4)</b>	20:8 52:17	12:25 13:5
29:4,7,10,14	9:8 11:21,23	3:2 4:2 10:2,2	<b>record (15)</b>	52:4 53:21
29:17,22,25	18:17 27:8,14	<b>radiates (1)</b>	7:7 11:24	58:13
30:4,7,11,13	30:22 35:8	17:2	14:21 16:11	<b>reflex (3)</b>
30:17 31:5,8	36:12 52:9	<b>radiating (3)</b>	17:22 18:22	38:13,22,23
31:19 32:2,7	53:18,23	48:3,15 49:23	22:14,22,23	<b>refusal (1)</b>
32:12,17,24	55:10 57:11	<b>radiation (1)</b>	28:24 33:19	6:16
33:15 34:9,20	57:12 58:5,7	53:11	40:21 44:16	<b>regard (2)</b>
34:25 35:5,18	<b>questioning (5)</b>	<b>radiculopath...</b>	52:21 61:11	10:19 35:10
35:24 36:9,18	5:21 6:5 7:25	21:3 37:13	<b>recorded (4)</b>	<b>regarding (4)</b>
36:23 37:5,11	9:7 53:8	<b>raised (1)</b>	8:18 14:24	9:7 15:24
37:15,21 38:5	<b>questions (16)</b>	5:18	20:15 46:15	35:14 44:2
38:14,20 39:2	6:8 10:18,20	<b>Randi (2)</b>	<b>recording (1)</b>	<b>regardless (1)</b>
39:9,20 40:7	11:7,12,13	2:4 61:4	8:19	57:8
40:13,19,21	35:6,10,14	<b>read (8)</b>	<b>records (33)</b>	<b>region (1)</b>
41:2,8,21	36:9,13,18	16:15,16 19:6	10:19 12:23	21:3
42:5,10,15,17	42:19 51:18	19:10 24:25	15:9,13,17,19	<b>regular (2)</b>
42:23,25 43:4	51:22 55:3	28:19 30:4	16:4 17:6,18	25:19 28:6
43:7,10,12,15	<b>Quezada (34)</b>	37:9	18:19 20:3,5	<b>relate (1)</b>
43:18,20,24	1:3 12:8,25	<b>real (1)</b>	20:9,11,16	33:13
44:8,12,18,21	13:14 15:14	19:10	32:19,25 33:3	<b>related (6)</b>
44:23 45:9,11	16:3,20 19:19	<b>really (5)</b>	33:5,18 34:9	25:9 30:10
45:14,17,22	20:6 22:18	10:25 11:11	34:10,11,16	40:10 41:5,14
45:25 46:4,7	23:15 24:3,12	15:23 21:18	39:23 40:2,10	61:15
46:13,22,25	33:23 34:5,23	25:2	43:21 44:12	<b>relationship ...</b>
47:6,14,17,20	36:24 37:25	<b>reason (5)</b>	52:2,11 56:12	30:19
48:2,6,8,13	40:11,14 41:2	7:6 27:10,10	57:6	<b>relayed (2)</b>
48:16,19,22	41:21 42:6,21	31:14 62:5	<b>recovered (1)</b>	12:20 14:17

<b>relief (1)</b> 5:15	8:14 31:2 45:17	7:16	3:2 4:2	<b>script (1)</b> 44:10
<b>remain (1)</b> 48:12	<b>reports (4)</b> 28:16 51:7	<b>review (7)</b> 15:13 28:16 32:18,19,20 36:25 54:17	<b>said (15)</b> 11:7 13:6 14:23 24:15 29:7 35:19 37:12 40:3 47:14 52:4,16 53:19 54:22 55:18 57:2	<b>scroll (2)</b> 18:8 26:3
<b>remainder (1)</b> 6:20	52:6 58:12	<b>reviewed (6)</b> 15:19 17:7 24:19 37:17 50:3 62:2	29:7 35:19 37:12 40:3 47:14 52:4,16 53:19 54:22 55:18 57:2	<b>Sean (3)</b> 3:11 42:11,17
<b>remained (1)</b> 45:4	<b>represent (3)</b> 10:13 20:2 51:4	<b>representing (1)</b> 20:8	37:12 40:3 47:14 52:4,16 53:19 54:22 55:18 57:2	<b>sec (1)</b> 38:3
<b>remains (2)</b> 30:5 51:8	<b>representati...</b> 12:2	<b>revision (1)</b> 27:4	<b>same (5)</b> 18:13,15 48:14 50:16 53:3	<b>second (7)</b> 1:16,19 4:5 15:24 25:2 29:25 58:7
<b>remote (1)</b> 8:11	<b>represented ...</b> 42:7	<b>rheumatolog...</b> 21:22	<b>saw (8)</b> 24:3,11 25:14 28:9 38:8 41:21 48:18 49:4	<b>secondary (2)</b> 29:20 45:6
<b>remotely (1)</b> 8:16	<b>representing...</b> 42:18	<b>rheumatolog...</b> 22:2	<b>say (9)</b> 29:19 30:21 31:15 34:20 35:25 36:7 45:22 55:12 56:5	<b>section (6)</b> 7:5 8:8 15:16 16:17 28:13 55:5
<b>remove (1)</b> 26:23	<b>request (3)</b> 5:21 56:24 60:10	<b>right (17)</b> 5:14 6:9,20 12:18 13:11 18:14 19:3 21:7 22:9,15 27:5 30:5 32:23 48:23 52:22 54:24 55:19	<b>say (9)</b> 29:19 30:21 31:15 34:20 35:25 36:7 45:22 55:12 56:5	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>removed (1)</b> 26:14	<b>requirement ...</b> 31:2,12	<b>reserved (1)</b> 7:13	<b>say (9)</b> 29:19 30:21 31:15 34:20 35:25 36:7 45:22 55:12 56:5	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>rename (1)</b> 56:8	<b>resolved (1)</b> 51:14	<b>resonance (1)</b> 28:21	<b>say (9)</b> 29:19 30:21 31:15 34:20 35:25 36:7 45:22 55:12 56:5	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>render (1)</b> 54:3	<b>respect (9)</b> 12:10 14:10,11 20:6 33:9 35:11,22 52:10 53:21	<b>rights (1)</b> 7:19	<b>say (9)</b> 29:19 30:21 31:15 34:20 35:25 36:7 45:22 55:12 56:5	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>rendered (1)</b> 35:12	<b>respect (9)</b> 12:10 14:10,11 20:6 33:9 35:11,22 52:10 53:21	<b>Road (1)</b> 3:10	<b>says (15)</b> 15:16 16:13,19 17:2 18:4 19:7 20:19 21:3 23:12,13 24:10,24 25:3 28:13 62:2	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>repetitive (1)</b> 44:7	<b>respective (1)</b> 5:4	<b>room (1)</b> 17:8	<b>says (15)</b> 15:16 16:13,19 17:2 18:4 19:7 20:19 21:3 23:12,13 24:10,24 25:3 28:13 62:2	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>rephrase (1)</b> 11:14	<b>response (8)</b> 11:25 31:13 38:11,17 39:23 40:2,9 56:9	<b>ROSENBLU...</b> 4:11	<b>scan (2)</b> 28:21 54:20	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>replaced (1)</b> 26:15	<b>responses (1)</b> 39:3	<b>rule (6)</b> 5:5,9,24,25 6:15 7:19	<b>scanned (1)</b> 55:7	<b>see (43)</b> 12:13 13:11 15:6,15 18:2 18:4,6,9,23 19:7 20:20 21:2,5 22:23 23:2,6,9,22 23:24 24:7 25:18,24 28:3 28:6,12 29:22 29:25 36:11 42:3 43:3 44:15,18 46:9 47:8,17 49:12 50:6 52:7 55:2,14,21 57:25 58:7
<b>report (14)</b> 20:22 24:7,18 24:22 25:24 26:4 28:3 29:22 30:2,20 31:20 37:15 37:21,24	<b>result (2)</b> 27:11 35:20	<b>rules (2)</b> 5:6 7:5	<b>scheduled (1)</b> 35:2	<b>seeing (3)</b> 13:10 41:22 42:2
<b>reported (3)</b> 17:8 46:19 47:15	<b>resulting (1)</b> 41:6	<b>RULINGS (1)</b> 60:20	<b>Scott (8)</b> 1:7,7,15,15 3:15,15,24 10:12	<b>seen (3)</b> 16:6 40:8 49:10
<b>Reporter (4)</b> 8:10,17 61:4 61:21	<b>return (1)</b>	<b>S</b>	<b>screen (7)</b> 15:5 16:10 24:6,8 25:25 29:23 37:22	<b>segment (9)</b> 15:22 26:20,21 26:22,25
<b>reporting (3)</b>		<b>S (2)</b>		

27:18,20 28:23 29:20 <b>segments (1)</b> 25:8 <b>send (4)</b> 30:21 57:5,9 58:6 <b>sending (1)</b> 58:22 <b>sent (3)</b> 33:17 34:9,11 <b>sentence (5)</b> 24:24 25:2,2 28:19 29:25 <b>separate (4)</b> 8:11 33:20 57:5 58:14 <b>September (9)</b> 23:3,4,15 24:16 43:5 48:18,19,20 52:3 <b>Service (1)</b> 8:14 <b>Services (4)</b> 1:13,18 4:5 51:5 <b>set (4)</b> 6:10 7:4 33:16 61:9 <b>settlement (1)</b> 36:4 <b>settlements (1)</b> 35:20 <b>several (1)</b> 13:13 <b>share (3)</b> 15:4 24:6 28:2 <b>sharing (1)</b> 19:25 <b>sheet (3)</b> 12:24 15:17 62:1 <b>shoes (1)</b>	46:18 <b>Shorthand (1)</b> 61:4 <b>should (2)</b> 7:4 44:6 <b>shoulder (1)</b> 49:25 <b>show (2)</b> 32:25 33:3 <b>showed (4)</b> 33:5 39:24 50:4 52:2 <b>shown (1)</b> 39:22 <b>Signature (1)</b> 62:23 <b>signed (1)</b> 7:14 <b>significant (4)</b> 6:12 39:16 41:16 45:20 <b>signs (3)</b> 38:16 39:2 41:8 <b>simply (2)</b> 10:22 31:13 <b>Sinai (2)</b> 22:23 33:5 <b>sir (21)</b> 10:16 11:10 12:5,16,23 15:8,12 16:14 16:15,18 23:12 24:7 25:22,25 26:18 28:2 29:22 32:5 33:15 35:5 53:18 <b>sit (1)</b> 46:17 <b>sites (1)</b> 31:17 <b>six (2)</b>	20:18 49:13 <b>Slope (2)</b> 41:25 42:2 <b>SMALLETS...</b> 4:7 18:8 51:3 54:13 57:5 58:25 60:8 <b>smart (1)</b> 11:6 <b>SMITH (1)</b> 4:4 <b>socks (1)</b> 46:18 <b>solid (1)</b> 26:24 <b>solidly (1)</b> 27:17 <b>some (26)</b> 11:12 14:24 20:10,11,12 20:13 25:5 33:18 38:16 39:23,24 41:13,19 44:24 45:6 46:19 47:5 48:3,15 49:23 49:24,24,25 51:7 53:11 56:22 <b>somehow (1)</b> 56:23 <b>someone (2)</b> 13:8 30:13 <b>something (9)</b> 13:18 21:15,16 22:5 28:16 29:2 35:20 38:20 39:18 <b>sometimes (1)</b> 31:21 <b>somewhere (5)</b> 52:12,21,25 53:5,6	<b>Sonsini (1)</b> 54:10 <b>sorry (6)</b> 25:7 26:9,16 31:2 48:14 54:24 <b>sort (8)</b> 12:24 13:24 29:10 36:2,4 36:5 52:6 53:16 <b>Spanish (3)</b> 13:17,20,22 <b>spanning (1)</b> 27:2 <b>speak (3)</b> 11:18 13:20 31:7 <b>speaking (2)</b> 13:13 20:5 <b>specific (4)</b> 14:14 20:7 31:22 46:13 <b>specifically (4)</b> 16:6 22:5 51:9 52:10 <b>specifics (2)</b> 13:24 14:18 <b>spectrum (3)</b> 41:15,18,20 <b>spell (1)</b> 40:21 <b>spent (1)</b> 13:13 <b>spinal (2)</b> 15:21 30:9 <b>spine (5)</b> 15:19 28:22 50:14 52:16 53:16 <b>spondylogeni...</b> 25:6 <b>spread (1)</b> 19:22	<b>SPRING (2)</b> 1:7 3:9 <b>stable (4)</b> 26:24 44:4 45:5 50:5 <b>stand (2)</b> 46:17 56:6 <b>start (2)</b> 44:5,11 <b>started (4)</b> 12:6 16:24 17:10 28:6 <b>State (5)</b> 1:2 2:5 10:4 30:22 61:5 <b>stated (3)</b> 5:19 7:6 33:19 <b>statement (2)</b> 5:22 6:17 <b>statements (3)</b> 6:4 31:10,11 <b>Status (2)</b> 19:16 28:23 <b>still (3)</b> 23:16 45:17 48:25 <b>STIPULAT...</b> 5:3 8:6,25 <b>STIPULATI...</b> 5:2 6:2 7:2 8:2 9:2 <b>stoop (1)</b> 46:17 <b>stop (1)</b> 19:25 <b>stopped (1)</b> 41:25 <b>stored (1)</b> 56:10 <b>strange (1)</b> 21:18 <b>Street (5)</b> 4:6 41:24 57:23 58:2,11
--	---	--	---	---

<b>stress (2)</b> 27:19 29:20	3:5	44:25 45:7,20	59:2 60:6	56:15 57:11
<b>strike (1)</b> 7:10	<b>sum (4)</b> 46:25 47:20 48:8 49:18	45:22 47:5,6 48:4 50:2	<b>tenderness (1)</b> 21:21	58:2,5
<b>studies (2)</b> 25:4 37:2	<b>SUPREME (1)</b> 1:2	<b>system (2)</b> 39:13 56:10	<b>tendon (1)</b> 38:23	<b>them (2)</b> 16:6 42:3
<b>study (1)</b> 37:16	<b>sure (12)</b> 10:23 12:19 15:7 16:16 22:11,13 25:13 26:24 27:9 43:25 51:17 56:25	<b>T</b>	<b>term (2)</b> 27:21 29:19	<b>themselves (1)</b> 25:4
<b>stuff (1)</b> 55:6		<b>T7-T8 (4)</b> 23:14,20 33:6 52:3	<b>terms (1)</b> 33:12	<b>then (20)</b> 13:10 16:24,25 17:10 18:12 25:18 26:24 26:25 27:20 32:7 38:23 41:24 47:21 49:8,19 51:23 54:17,25 55:2 56:5
<b>subdivision (1)</b> 6:15		<b>take (6)</b> 11:19,23 13:8 36:10 38:3 54:17	<b>testified (4)</b> 10:5,24 11:3 53:8	26:25 27:20 32:7 38:23 41:24 47:21 49:8,19 51:23 54:17,25 55:2 56:5
<b>subdivisions ...</b> 5:9	<b>surgeon (1)</b> 21:25	<b>taken (5)</b> 5:12 7:18 32:4 53:24 62:2	<b>testify (2)</b> 10:15,16	41:24 47:21 49:8,19 51:23 54:17,25 55:2 56:5
<b>subject (1)</b> 5:13	<b>surgeries (2)</b> 35:12 51:14	<b>taking (3)</b> 14:5 32:3 58:23	<b>testifying (1)</b> 10:17	<b>therapy (5)</b> 44:5,8,11,13 44:17
<b>subpoena (10)</b> 2:4 10:14 11:25 39:24 40:3,9 56:9 57:3,6,6	<b>surgery (28)</b> 25:21 26:4,11 26:14 27:4,5 27:6,11,12,17 27:24 29:5,12 29:15 36:24 38:2 43:16 44:3,14 47:4 47:12,23,24 48:11 49:2 50:14 53:10 53:16	<b>talk (1)</b> 31:5	<b>testimony (5)</b> 7:10 52:14 58:14 61:11 62:3	<b>there's (11)</b> 11:21 15:16 20:25 21:21 23:7,23 28:13 31:23 45:15 54:25 55:15
<b>Subscribed (2)</b> 59:11 62:23		<b>talking (2)</b> 29:4 53:9	<b>testing (1)</b> 25:3	44:5,8,11,13 44:17
<b>subsequent (1)</b> 44:16		<b>Tan (3)</b> 1:7 3:9 42:18	<b>than (3)</b> 14:16 17:13 40:7	44:17
<b>Subsequentl...</b> 17:17		<b>tap (1)</b> 38:22	<b>thank (11)</b> 10:16 15:8 16:18 17:4 33:15 37:5 38:5 50:23 58:17,20,23	<b>thereafter (1)</b> 42:4
<b>substance (4)</b> 46:25 47:20 48:8 49:18	<b>surgical (1)</b> 55:5	<b>tapping (1)</b> 38:13	<b>thanks (1)</b> 58:19	<b>thereby (1)</b> 7:21
<b>successful (1)</b> 15:5	<b>sustained (1)</b> 12:11	<b>tecum (1)</b> 57:6	<b>that's (28)</b> 11:16 14:16 18:20 19:17 24:21 25:10 25:17 26:16 27:5 28:15 29:17,18,21 31:13,14,14 32:4,23 34:24 37:11,14 50:11 55:9,22	<b>therefore (1)</b> 6:18
<b>succinct (1)</b> 6:17	<b>sworn (7)</b> 7:14 8:16 10:3 59:11 61:10 62:1,23	<b>telemedical (1)</b> 35:2		<b>these (13)</b> 7:5 15:9 20:2 30:11 33:6,8 33:10 36:2 46:4,20 53:21 54:4 57:10
<b>succinctly (2)</b> 5:19 7:7		<b>tell (15)</b> 11:16 12:25 14:9,14,19 17:12 19:21 20:7 21:9 22:18 23:12 23:18 30:24 35:16 46:22		46:4,20 53:21 54:4 57:10
<b>such (4)</b> 7:5,12 61:10 61:12	<b>symptom (2)</b> 38:21 47:25	<b>TEMPLE (4)</b> 3:18 36:17		<b>thi (1)</b> 16:10
<b>suffered (2)</b> 23:19 40:15	<b>symptomatic...</b> 48:12			<b>thing (5)</b> 19:7 24:2 27:2 46:15 48:14
<b>suggest (1)</b> 5:20	<b>symptoms (14)</b> 21:12 39:4,11 41:5,8,10			<b>things (6)</b> 11:11 32:16
<b>Suite (1)</b>				

33:7 38:9 41:13 46:20 <b>think (6)</b> 33:7 42:10 46:9 50:22 52:4 58:8 <b>third (1)</b> 20:24 <b>Third-Party ...</b> 1:11,14,16,19 3:14 4:4,5 <b>this (65)</b> 5:25 6:15 7:11 7:13,14,24 8:4,8,18,22 9:9 10:13,19 12:5,10 13:12 13:15,22 14:4 14:15 15:10 17:22 18:12 18:21 19:6,25 20:2,17,17,24 21:15 22:14 23:2 24:11,18 26:3 27:7,22 28:10 29:17 30:9 32:21 33:10,15,16 35:24,25,25 36:9 40:16 41:4 42:8 46:9 51:5,25 52:17 53:22 54:15 55:17 55:19 56:22 59:12 61:15 61:18 62:24 <b>thoracic (2)</b> 49:24 52:15 <b>those (23)</b> 17:18 20:9,15 22:7 25:11 29:2 32:16 33:11 39:2,3	39:7,10 40:2 40:8 41:13,19 53:5,24 54:20 56:2,8,23,24 <b>though (1)</b> 47:22 <b>three (2)</b> 25:11 51:22 <b>through (6)</b> 11:11 16:8 33:25 34:7 49:4 55:3 <b>time (23)</b> 7:12 11:2,13 11:15,19 16:2 23:22 24:3,11 36:9 40:24 44:9 46:8,9 46:18 47:2,22 47:25 48:22 52:6 55:11 58:23 59:3 <b>times (5)</b> 16:22 21:19 39:20 49:12 49:13 <b>tingling (3)</b> 41:11 47:11,15 <b>to (206)</b> 2:3 5:13,14,14 5:15,20,20,22 5:24 6:8,9,13 6:14,16,16,20 7:9,9,10,10 7:11,14,16,16 7:17 8:8,15 9:4,5,5,6 10:14,14,15 10:15,16,18 10:19,20 11:6 11:7,12,14,19 11:21,22,25 12:5,10,11,14 12:15,25	13:25 14:10 14:11 15:2,4 15:4,4,5,13 16:8,9,10,16 16:23 17:8 18:22 19:2,5 19:6,14,25 20:2,2,6,12 20:14 21:23 22:3,8,10,21 24:2,6,25 25:9,18 26:3 26:23 27:7,11 27:19 28:2,6 28:12 29:10 29:18,20 30:8 30:10,13,17 30:20,21 31:7 31:13,15,21 31:22 32:14 32:18 33:9,10 33:13,15,16 33:21 34:5,10 34:14,20 35:7 35:8,10,11,15 35:16,22,23 35:25 36:7,10 36:10,12,20 37:3,9 38:7 38:25 39:5,5 39:10,18,23 40:2,9,10,16 40:23 41:5,14 41:16,17 43:25 44:3,7 44:10,25 45:3 45:6,7,18,22 46:16,20 48:11 50:12 50:14,20 51:9 52:7,10 53:11 53:16,20,22 54:5,15 55:3 55:10,11,13	55:16,19 56:9 56:15,20,22 56:23,24 57:2 57:2,7,9,22 58:6,12,13 59:11 60:13 61:15,15 62:3 62:23 <b>today (11)</b> 10:16 11:25 12:2 31:5 33:18 34:21 37:22 39:21 40:8 57:3 58:13 <b>told (8)</b> 14:9,12 17:7 32:20 33:6 52:11,14 53:4 <b>took (1)</b> 13:17 <b>top (3)</b> 18:5,22 21:2 <b>total (1)</b> 20:17 <b>totally (3)</b> 30:6 51:8,11 <b>Touliopoulos...</b> 47:13,23 <b>towards (1)</b> 54:5 <b>transcribed (1)</b> 47:8 <b>transcript (1)</b> 62:2 <b>transfer (1)</b> 27:19 <b>traumaticall...</b> 21:16 <b>traveling (2)</b> 47:5,9 <b>treated (3)</b> 12:7 13:3 41:3 <b>treating (4)</b>	31:16 40:14 41:3 52:15 <b>treatment (11)</b> 15:13 16:3 17:6 20:10 32:16 33:24 34:4,5 40:11 53:15 56:4 <b>trial (3)</b> 5:6 7:13 11:3 <b>trigger (1)</b> 21:13 <b>trouble (1)</b> 46:11 <b>true (1)</b> 61:11 <b>try (3)</b> 15:4 20:2 22:21 <b>trying (1)</b> 33:16 <b>turn (2)</b> 31:7 42:11 <b>twist (1)</b> 46:16 <b>twisting (2)</b> 44:6 46:12 <b>two (13)</b> 16:24 17:10 19:16,21 24:22 28:12 33:2 34:22 39:3 51:22 53:5 56:13 57:18 <b>type (2)</b> 14:20 47:6 <b>typically (5)</b> 21:21,25 31:4 54:22,25 <hr/> <b>U</b> <hr/> <b>unable (1)</b> 35:25
---	---	---	--	--

<b>unauthorize...</b>	57:22	48:5,6 49:14	12:6	22:14 25:14
8:21	<b>used (2)</b>	49:17 50:9	<b>weakness (3)</b>	29:14,17 31:2
<b>uncomfortab...</b>	8:22 21:19	52:5 55:22	17:3 41:11	37:24 38:8,13
27:7,14 35:9	<b>using (1)</b>	56:6	47:11	41:21 42:2,25
<b>under (4)</b>	41:17	<b>visits (8)</b>	<b>wedge (6)</b>	43:7,12 44:21
8:13 23:9,16	<b>usual (1)</b>	34:23 35:2	23:13,19 33:5	45:25 46:22
30:5	30:17	44:16,17 46:4	52:3,10 53:3	49:14 54:14
<b>understand (2)</b>	<b>usually (1)</b>	48:16 49:3	<b>week (1)</b>	55:2
11:13 35:18	11:17	53:5	18:25	<b>where (12)</b>
<b>underwent (1)</b>	<b>utilized (1)</b>		<b>weeks (2)</b>	15:10 16:23
44:13	47:12		16:24 17:10	19:7 21:11,21
<b>Uniform (1)</b>		<b>W (1)</b>	<b>well (5)</b>	25:3 29:11
5:6	<b>V</b>	10:2	11:10 23:4,24	45:11,13
<b>Uniondale (1)</b>	<b>various (1)</b>	<b>waived (1)</b>	33:16 57:10	57:24,25
3:17	20:25	7:25	<b>went (3)</b>	58:10
<b>Universal (4)</b>	<b>Vecchione (2)</b>	<b>waiver (2)</b>	15:10 19:2	<b>wherever (1)</b>
20:3,5 33:3	2:4 61:4	7:11,19	28:12	31:20
37:7	<b>vertebra (1)</b>	<b>want (11)</b>	<b>West (3)</b>	<b>whether (8)</b>
<b>universally (1)</b>	23:14	10:16 15:5	41:23 58:2,11	7:3 20:8 31:19
55:7	<b>vertebral (3)</b>	16:9,16 31:6	<b>what (38)</b>	32:8 33:23
<b>unless (1)</b>	15:22 23:20	31:7 33:15	10:10 14:9	36:3 44:12
6:25	28:23	35:8 36:14	15:18 21:9	57:8
<b>unquote (1)</b>	<b>very (1)</b>	37:9 56:25	23:12 25:9	<b>which (17)</b>
58:15	41:15	<b>Water (1)</b>	26:18 27:18	11:7,15 13:7
<b>until (2)</b>	<b>via (2)</b>	4:6	29:4 30:14,14	13:25 14:5
34:21 42:5	2:2 8:12	<b>way (8)</b>	34:16 35:18	15:20 20:18
<b>up (4)</b>	<b>Videoconfer...</b>	14:24 22:10	36:10 38:10	24:15 25:6,16
11:3 33:16	2:2 8:9,12,18	34:3 35:25	41:8 43:18,20	33:18 36:3
48:23 50:12	9:10	53:3 56:2,21	43:21 44:23	38:11,18
<b>update (3)</b>	<b>violation (1)</b>	61:17	46:7,25 47:6	44:25 46:20
24:25 40:5	8:21	<b>ways (1)</b>	47:8,20 48:2	54:2
55:19	<b>visit (39)</b>	22:11	48:8,13,19,22	<b>while (3)</b>
<b>updated (1)</b>	12:19 13:6	<b>we (22)</b>	49:6,8,15,18	22:13 36:12
20:11	15:15 17:22	10:15 11:20,22	53:19 55:12	51:13
<b>upon (1)</b>	20:18,20 28:5	11:23 13:13	57:19 58:4	<b>who (6)</b>
31:21	29:23 30:11	17:21 18:22	<b>what's (3)</b>	11:7 12:7 13:4
<b>upper (3)</b>	30:13 34:13	19:5 20:10,10	26:20,21 38:10	42:7 54:7
16:12 37:6	34:19 36:23	22:5 27:18	<b>whatever (6)</b>	55:10
49:24	39:25 40:7	31:15 33:16	17:6 19:20	<b>whole (4)</b>
<b>us (5)</b>	42:6,20,23,25	33:18 34:10	35:2 36:14	16:16 19:6
11:20 14:9	43:4,7,10,12	36:20 50:2	56:24 57:3	20:10 27:2
33:21 34:14	43:18,22,23	56:2,23 57:5	<b>when (24)</b>	<b>whom (1)</b>
57:9	43:25 44:21	58:21	6:11 13:9,16	5:11
<b>use (1)</b>	45:5,25 46:22	<b>we'll (1)</b>	15:3 17:8	<b>whose (2)</b>

7:18 61:9	53:19,21	42:3 44:10	25:13,20,23	49:20 60:4
<b>why (2)</b>	55:15 56:4	45:22 52:9,12	26:2,6,10,13	<b>10/25/21 (1)</b>
32:4 50:19	57:10 58:8	52:20,23,25	26:16,19	23:25
<b>will (6)</b>	<b>within (6)</b>	53:4 54:2	27:25 28:4,8	<b>100 (3)</b>
8:18 11:16,20	2:5 10:4 30:8	56:5,11,23	28:11,14 29:6	30:5 33:13
35:7 53:19	30:18 32:9	57:12	29:9,16,18,24	51:8
57:13	52:18	<b>wow (1)</b>	30:3,7,12,16	<b>10001 (1)</b>
<b>Willets (1)</b>	<b>without (1)</b>	11:5	31:25 32:6,11	58:9
3:10	8:19	<b>wrapped (1)</b>	32:16,23	<b>10005 (1)</b>
<b>William (2)</b>	<b>witness (16)</b>	52:6	33:11,14	4:6
45:15,16	2:3 7:15 8:3,11	<b>wrist (2)</b>	34:18 36:8,22	<b>10018 (1)</b>
<b>Wilson (1)</b>	8:15,16 9:4,5	38:12,25	38:16 40:6	3:5
54:9	9:7 10:3,22	<b>write (1)</b>	41:13 42:22	<b>10th (2)</b>
<b>Windows (4)</b>	57:11 60:3	30:13	42:24 43:6,24	23:3,4
20:11,12 40:4	61:9,12 62:23	<b>writing (1)</b>	44:10,20	<b>11 (9)</b>
55:19	<b>witness's (1)</b>	25:10	45:10,14,24	12:19 15:17
<b>with (83)</b>	8:17	<b>written (1)</b>	46:6 47:16,19	20:12 24:11
5:5 6:4,25 8:4	<b>women (1)</b>	8:20	48:7 49:4,10	36:24 40:5
10:19,24 12:2	21:23	<b>wrong (1)</b>	49:22 50:15	42:21 55:16
12:10,23	<b>Word (4)</b>	51:25	52:8,23 53:2	55:19
13:16 14:4,10	55:22,23,24	<hr/> <b>X</b> <hr/>	53:7,13,23	<b>11/04/2025 (1)</b>
14:11 15:6,13	57:10	<b>x (5)</b>	54:19 56:7,14	62:2
15:22 16:3,20	<b>words (2)</b>	1:3,9,15,20	57:14	<b>11/30/18 (1)</b>
16:21 17:16	27:19 57:8	60:2	<b>yesterday (4)</b>	20:22
18:16 19:20	<b>work (4)</b>	<b>x-rays (2)</b>	33:16 34:10,12	<b>11215 (1)</b>
20:6,7 21:13	16:23 42:18	45:3,4	34:14	57:23
21:19 22:2,5	51:12,16	<hr/> <b>Y</b> <hr/>	<b>York (14)</b>	<b>11507 (1)</b>
22:15,17,19	<b>Workers' (6)</b>	<b>YAKAITIS (2)</b>	1:2 2:5 3:5,5	3:10
22:21,22 33:9	30:23 31:16	3:4,6	3:10,17 4:6,6	<b>11553-3644 (1)</b>
34:16,19,23	33:25 34:6,7	<b>Yeah (2)</b>	10:4 15:19	3:17
35:10,11,22	54:14	22:10 39:7	18:6 30:22	<b>11th (7)</b>
36:23 37:25	<b>worsening (1)</b>	<b>years (1)</b>	57:23 61:5	13:7,16 24:4
38:21 40:3	19:15	34:22	<hr/> <b>Z</b> <hr/>	24:16 25:15
41:17 42:6,7	<b>worth (1)</b>	<b>yes (90)</b>	<b>zip (1)</b>	28:5 42:5
42:25 43:4,7	33:12	11:2 12:9,17	58:4	<b>12th (1)</b>
43:12,21	<b>would (34)</b>	13:9,23 14:25	<hr/> <b>0</b> <hr/>	48:20
45:25 46:11	6:12 12:24	16:14 18:11	<b>06104-2903 (1)</b>	48:7
46:16,19,23	13:21 14:24	18:15,15 19:4	3:23	<b>1359 (1)</b>
47:2,4,13,21	16:7 20:2	19:9,13 20:21	<hr/> <b>1</b> <hr/>	18:21
47:23 48:2,3	21:15 22:9	21:4,8 22:25	<b>1 (1)</b>	<b>1396 (1)</b>
48:6,9,12,15	25:22 33:8,22	23:5,8,11,17	29:23	16:11
48:16 49:3	34:6,20 35:15	24:5,9,13,17	<b>10 (2)</b>	<b>141 (3)</b>
50:2 52:10,19	36:7,10,12	24:20,23		41:23 58:2,11
53:3,8,11,15	39:18 41:9,9			

<b>1430 (1)</b> 3:5	29:13,14 36:24 37:8	<b>23rd (1)</b> 37:8	<b>37-year (2)</b> 16:20 19:11	1:6 <b>77 (1)</b>
<b>1449 (2)</b> 16:10 18:21	42:5,21,23 55:16	<b>24 (1)</b> 36:25	<hr/> <b>4</b> <hr/>	4:6 <b>7th (2)</b>
<b>15th (2)</b> 19:18 37:20	<b>2020 (8)</b> 30:25 38:8,9	<b>24th (2)</b> 25:21 37:18	<b>4 (1)</b> 1:20	17:24 58:3 <hr/>
<b>16 (1)</b> 51:10	43:3,5,9,11 43:13	<b>25 (1)</b> 23:22	<b>4-5 (3)</b> 25:8 26:8,9	<hr/> <b>8</b> <hr/>
<b>18 (2)</b> 43:11,13	<b>2021 (15)</b> 23:3,4,15,23	<b>25th (1)</b> 47:19	<b>42 (1)</b> 60:7	<b>8th (2)</b> 17:25 41:25 <hr/>
<b>1802 (1)</b> 3:5	25:22 29:15 31:9 36:25	<b>27th (1)</b> 43:3	<b>4th (1)</b> 34:21	<hr/> <b>9</b> <hr/>
<b>18th (1)</b> 38:8	37:18 43:14 43:23 44:18	<b>28 (1)</b> 43:5	<hr/> <b>5</b> <hr/>	<b>9 (1)</b> 43:9
<b>19 (3)</b> 29:21 44:22 46:24	46:3 48:7 52:3	<b>28th (3)</b> 41:23 58:2,11	<b>5 (2)</b> 43:14,23	<b>9372 (1)</b> 3:16
<b>19th (1)</b> 45:18	<b>2022 (1)</b> 31:10	<b>2903 (1)</b> 3:23	<b>5-6 (1)</b> 25:8	
<b>1st (1)</b> 57:22	<b>2023 (12)</b> 29:23 34:15,21 49:8,11,12,14 49:17,20,22 50:10 51:10	<hr/> <b>3</b> <hr/>	<b>51 (2)</b> 60:4,8	
<hr/> <b>2</b> <hr/>		<b>3/15/18 (1)</b> 18:24	<b>54 (1)</b> 60:8	
<b>2/11/19 (1)</b> 55:22	<b>2024 (1)</b> 50:7	<b>3/16/18 (1)</b> 18:24	<b>55 (1)</b> 41:24	
<b>2:13 (1)</b> 1:21	<b>2025 (2)</b> 1:20 34:22	<b>3/24/21 (1)</b> 38:2	<b>56 (1)</b> 60:5	
<b>20 (6)</b> 48:20 49:17,22 50:9 59:12 62:24	<b>20th (4)</b> 34:15,21 49:16 49:21	<b>3:38 (1)</b> 59:3	<b>567 (1)</b> 57:22	
<b>200 (1)</b> 3:10	<b>21 (7)</b> 29:16,21 43:19 44:22 46:3,24	<b>30th (2)</b> 20:19 49:7	<b>57 (1)</b> 60:7	
<b>201 (1)</b> 20:17	<b>21st (1)</b> 4:6	<b>31 (1)</b> 5:15	<b>5th (1)</b> 44:18	
<b>2018 (8)</b> 12:12,22 14:2 14:17 19:18 20:19 24:16 25:16	<b>22 (2)</b> 48:18,21	<b>3113 (1)</b> 8:8	<hr/> <b>6</b> <hr/>	
<b>2019 (17)</b> 12:20 13:7,16 15:18 24:4,11 25:15 28:3,9	<b>221 (1)</b> 5:5	<b>3115 (3)</b> 5:9,24 6:15	<b>6 (1)</b> 42:23	
	<b>221.2 (1)</b> 7:5	<b>3116 (1)</b> 7:20	<b>6th (8)</b> 12:21 14:2,17 28:3,9 29:13 29:14 58:3	
	<b>23 (2)</b> 37:20 49:5	<b>333 (1)</b> 3:16	<hr/> <b>7</b> <hr/>	
		<b>36 (1)</b> 60:6	<b>7/19/21 (2)</b> 23:24,25	
			<b>707315/2018 ...</b>	