SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

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DAYSI COLORADO,

Index No.: 713555/16

Plaintiff,

-against-

Amended & Supplemental Verified Bill of Particulars

DEBORA MOTTAHEDEH, D.O., DAVID KHANAN, M.D., CHRISTINA BONO, R.P.A-C, ALEXANDRE B. DE MOURA, M.D., ALEXANDRE DE MOURA, M.D., P.C., LEEANN TRICARICO-FLOMAN, R.P.A.-C, and NEW YORK SPINE INSTITUTE,

Defendants.

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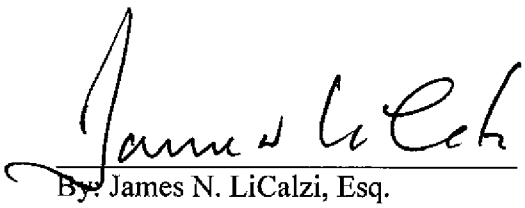
C O U N S E L O R S:

Plaintiff, **DAYSI COLORADO**, as and for her Verified Amended and Supplemental Verified Bill of Particulars as to the defendants **DEBORA MOTTAHEDEH, D.O.,** and **ALEXANDRE B. DE MOURA, M.D., P.C., d/b/a NEW YORK SPINE INSTITUTE** respectfully sets forth and alleges the following upon information and belief:

6. In addition to the negligent acts and/or omissions previously alleged against these defendants, including their agents, servants and/or employees, it is also alleged that they were careless and negligent in failing to timely and properly consider, recognize, investigate, identify, diagnose and treat and care for plaintiff **DAYSI COLORADO**'s (hereinafter referred to as the "patient") risk for the development of NSAID-induced renal failure and analgesic nephropathy and act upon same; in negligently and improperly providing and/or prescribing, and continuing to chronically provide and/or prescribe, a non-steroidal anti-inflammatory drug (Meloxicam or Mobic) to the patient; in failing to timely and inform, discuss and provide the patient with proper and necessary information regarding the risks associated with chronic use of NSAIDs and the use of NSAIDs conjunction with other medications, including other NSAIDs, ibuprofen or acetaminophen; in failing to have the proper concern for potential renal and gastric complications due to the patient's long-term/chronic use of

Meloxicam (Mobic); in failing to timely and properly obtain vital signs on the patient, including blood pressure, pulse, temperature and respiratory rate; in failing to timely and properly recommend and/or order and/or prescribe period laboratory testing, including urinalysis, complete blood count and chemistry panel in order to monitor the patient's kidney and liver function while on Meloxicam(Mobic); and, in failing to timely and properly discontinue the patient's use of Meloxicam (Mobic).

Dated: Uniondale, NY
September 3, 2019



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VERIFICATION

JAMES N. LiCALZI, an attorney admitted to practice in the courts of the State of New York, states:

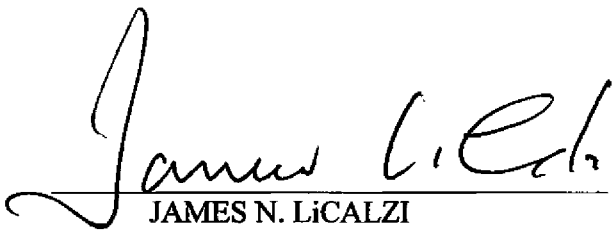
That I am a member of the law firm of DUFFY & DUFFY, PLLC, the attorneys for the plaintiffs in the within action. I have read the foregoing Verified Amended & Supplemental Bill of Particulars and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

The reason this verification is made by me and not by the plaintiffs is that the plaintiffs reside outside of the county where your deponent maintains his office for the practice of law.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows: correspondence and conversations with my clients; review of the file maintained by my office in this matter.

I affirm that the foregoing statements are true under the penalty of perjury.

Dated: Uniondale, New York
September 3, 2019



JAMES N. LiCALZI