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Case	:	ETHEL RISNER vs. Mercy Hospital
Testimony Date	:	March 26, 2003
Expert Witness	:	GAYLE GALAN M.D.
Expert Type	:	Emergency Medicine / Trauma
Court	:	State: Ohio County: CUYAHOGA
Pages	:	78

State of Ohio. County of Sumit.) SS: IN THE COURT OF COMMON PLEAS ETHEL RISNER, etc.) Plaintiff. Case No. CV-2001-04-1999 Wirey Momptal Wirey Momptal Defendents.) The DEPOSITION OF GAVLE A. CALAN, N.D. BY MR, MARX: Defendents.) The DEPOSITION OF GAVLE A. CALAN, N.D. Solution of CAVLE A. CALAN, N.D. BY MR, MARX: Defendents.) The DEPOSITION OF GAVLE A. CALAN, N.D. Solution of CAVLE A. C
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 Vs. J Case No. CV-2001-04-1689 Judge Cosprove Prepresent the state of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and needed malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The deposition of CAYLE A. GALAN, H.D., meane s. Jim Mark As I'm sure you've been told, I represent the estate of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. So at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this case. Correct? A Yes. Q And if I ask you any questions today that aren't clear, that you don't understand, please let me know that. A Yes. Q I the middle of a pending question - 3 A Yes. Q Coold you tall me your professional break in the middle of a pending question - 3 A Yes. Q Coold you tall me your professional diverting the street. Sect. Meet on, Hord, Failon, Poisley & Howley 250 Crieveland, Onto 44113 Con behalf of Defendant Jeffrey B. Roste, Meet on, Hord, Failon, Poisley & Howley 250 Crieveland, Onto 44113 Con behalf of Defendant Jeffrey B. Roste and Dr. Socor: Jeenne K. Multin, Esc. Romoring, Second Floor sameaky, Ohio 44870 On behalf of Defendant More Y Mespital of Hilling: On behalf of Defendant More Y Mespital of Hilling: On behalf of Defendant More Y Mespital of Hilling: On behalf of Defendant More Y Mespital of Defendant Merey Yespital of Defendant More Y Mespital On behalf of Defendant Merey Mespital of Willing: On behalf of Defendant Merey Mespital of Willing: On behalf of Defendant Merey Mespital of Willing: On behalf of Defendant Merey Mespital On
Mercy Hospital. 8 BY MR. MARX: Defendants. 9 G Good morning, Doctor. We were introduced. My name is Jim Marx. As I'm sure you've been told, I represent the estate of Vernon Risner in a medical majpractice action that has been filed against Willard Hospital and Drs. Secon and Ross. The deposition of GAVLE A. GALAM, H.D., Letherson of Builds, Darlee Vernon, Caster in a medical majpractice action that has been filed against Willard Hospital and Drs. Secon and Ross. The deposition of GAVLE A. GALAM, H.D., Letherson of Builds, Darlee Vernon, Exercise at the office as an expert by the defense in this depositional Reporter and Notary Public within and for the Builds of Chine, Laken before motion after of Photo, Laken as the offices of Weston, Nurd, Fallon, Pastaley is commencing at 9:22 a.n. the day and date above set forth. 20 Appearances: 2 On behalf of the Plaintiff: James A. Harx, Esq. Tract & Herr Second 1370 West of Street, Suite 350 2 Chevel Mid. Only ask that you don't take a break in the middle of a pending question - 3 A Yes. Q Could you tail me prove professional address, bease and you answer unless some privileged 5 On behalf of Defendant Jeffrey B. Rostg. M.D.: Baveriy A. Harris, Esg. Mactor, Hurdi G. Borendant Br. Rosso and Dr. Secor: James A. Harry, Esg. Mactor, Hurdi G. Borendant Br. Rosso and Dr. Secor: </th
 9 Q Good morning, Doctor. We were introduced. My name is Jim Max. As I'm sure you've been told, I represent the estate of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The deposition of GAYLE A. GALAN, H.D., webmesony, mARCH 26, 2003 The deposition of GAYLE A. GALAN, H.D., webmesony, march is Jim Max. As I'm sure you've been told, I represent the estate of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. So at this point in time, I'm here to ask you some questions because you've been it identified as an expert by the defense in this case. Correct? A So at this point in time, I'm here to ask you some questions because you've been it identified as an expert by the defense in this case. Correct? A Yes. Q And I'l ask you any questions today that aren't clear, that you don't understand, please let me know that. A Yes. Q Hiltry not to do that, but it may happen. If you need to take a break, that's fine, just let A Present in the middle of a pending question A Yes. Q Could you tell me your professional address, please? A lar memployed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Chartly Hospital which is on East 22 Street in Cleveland, Ohio. G I wahaff of Defendant Br. Rosse and Dr. Secor: Sandusky, Ohio 44870 G I wahaff of Defendant Br. Rosse and Dr. Secor: Sandusky, Ohio 44870 G I wahaff of Defendant Hercy Hospital of the babaff of Defendant Hercy Hospital of the mat appears to be a CV of yours. Is that correct, Doctor?
Defendants. 10 name is Jim Marx. As I'm sure you've been told, i represent the estate of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The Deposition of GAYLE A. GALAN, N.D., called by the Printer for examination pursuant to the undersigned. Darlene Vance, a Registered Professional Reporter and Motary Public within and for the State of Ohio, taken at the offices of Weston, Hurd, Fallon, Patistry & Howley, 2500 Terminal Tower, Cleveland, Ohio, commenting at 9:22 a.m. the day and date above set forth. 10 name is Jim Marx. As I'm sure you've been told, i represent the the state of Vernon Risner in a medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The deposition of GAYLE A. GALAN, N.D., called by the Printer for examination pursuent to the ohio Ruse of Civi Proceedure. Likeway State for the State of Ohio, taken at the offices of Weston, Hurd, Fallon, Patistry & Howley, 2500 Terminal Tower, Cleveland, Ohio, commenting at 9:22 a.m. the day and date above set forth. 50 A Yes. 20 Q I'll try not to do that, but it may happen. If you need to take a break, that's fine, just let A Yes. 2 4 A Yes. 2 4 A Yes. 2 2 On behalf of Defendant Jeffroy B. Romig, H.D.: Barner H. Hullin, Eac. Marker Withmerker 200 Tower Harting Tower 200 Tower Harting
THE DEPOSITION OF GAYLE A. GALAM, H.D I represent the estate of Vermon Risner in a medical mappractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The deposition of GAYLE A. GALAM, H.D So at this point in time, I'm here to ask you some questions because you've been it be obtained for the state of Ohio. tasking attered Tore state of Ohio. tasking the or the state of Ohio. Tasking attered So at this point in time, I'm here to ask you some questions because you've been it bis case. Correct? Tore the state of Ohio. tasking the or the state of Ohio. tasking the data at the offices of Weston, Hurd, Falton, Pataley & Howley, 2500 And if I ask you any questions today that aren't clear, that you don't understand, please let me know that. a.m. the day and date above set forth. 2 Mark task you any questions today that aren't clear, that you don't understand, please let me know. I would only ask that you don't take a break in the middle of a pending question - a break in the middle of a pending question - a break in the middle of a pending question - a A Yes. On behalf of the Plaintiff: James A. Marx, Esa. James A. Marx, Esa. 7 On behalf of Defendants Jeffrey B. Romig. H.D.: Beaving Y. A. Marris, Esa. 7 Arres Street: 8 On behalf of Defendants Dr. Rosso and Dr. Secor: 7 Jon behalf of Defendants Dr. Rosso and Dr. Secor: 7 Jon behalf of Defendants Dr. Rosso and Or Sendesky, Ohio 444
THE DEPOSITION OF GAVLE A. GALAN, H.D., MEDNESDAY, MARCH 26, 2003 12 medical malpractice action that has been filed against Willard Hospital and Drs. Secor and Ross. The deposition of GAVLE A. GALAN, H.D., called by the Plaintiff for examination pursuant to the thor Rules of Civil Procedure, taken bofore are, the undersigned, Darlene Vance, a Registered 50 at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this Trans Roporter and Notary Public within and for the State of Ohio, taken at the offices of Weston, Nurd, Pailon, Pationy State y & Monvey, 2000 19 A Yes. a.m. the day and date above set forth. 2 Q and if lask you any questions today that aren't clear, that you don't understand, please let me know that. On behalf of the Plaintiff: Jaganes M. Marx, 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113 2 On behalf of Defendant Jeffrey B. Roadg, H.D.: Beverly A. Harris, Esq. Addres Mindre Circuit State Mark 2500 Terminal Tower Cleveland, Ohio 44113 2 On behalf of Defendant Jeffrey B. Roadg, H.D.: Beverly A. Harris, Esq. Addres Mindre Circuit 2500 Terminal Tower Cleveland, Ohio 44113 2 On behalf of Defendant Jeffrey B. Roadg, M.D.: Beverly A. Mathing Rew, Second Floor Sandusky, Ohio 44870 8 On behalf of Defendant Bor. Rosso and Dr. Secor: Jaganes H. Multin, Esq. Carrie M. Mathing Rew, Second Floor Sandusky, Ohio 44870 1 On behalf of Defendant Bor. Rosso and Dr. Weshift of Defendant Mercy Hospital
THE DEPOSITION OF GAVLE A. GALAM, H.D., WEDNESDAY, MARCH 28, 2003 3 against Willard Hospital and Drs. Secor and Ross. The deposition of GAVLE A. GALAM, H.D., called by the Plaintiff for examination pursuant to the Ohio Rules of Civil Procedure, taken before me. the undersigned, Derlene Vince, a Registered Professional Reporter and Notary Public within and for the State of Ohio, Each at the office of Weston, Nurd, Pallon, Pataloy i Momy, 2800 Weston, Nurd, Pallon, Dito, commoning at 9:22 a.m. the day and date above set forth. So at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this case. Correct? On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx toro West of Defendant Spr. Resg Andrew Stiencicker, Esq. Madrew St
The demosition of GAVLE A. GALAN, H.D., called by the Plaintiff for a samination pursuant to the Ohis tubs of Civil Processional Reporter and Notary Public within and for the State of Ohio. Atkens at the offices of a semination pursuant to the day and date above set forth. 14 Ross. 13 So at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this case. Correct? 14 Ross. 15 So at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this case. Correct? 16 Yes. 17 Identified as an expert by the defense in this case. Correct? 19 A Yes. 20 And if I ask you any questions today that aren't clear, that you don't understand, please let me know that. 21 Clear, that you don't understand, please let me know that. 22 I'll try not to do that, but it may happen. If you need to take a break, that's fine, just let 24 Merk.s. 25 Troci & Marx. 26 I'll try not to do that, but it may happen. If you answer unless some privileged objection is being raised by counsel. 26 Cleveland, Ohio 44113 26 Could you tell me your professional address, please? 27 A Yes. 28 Could you tell me y
The deposition of GAYLE A. GALAN, H.D., called by the Plaintiff for examination pursuant to the Undersigned, Darlene Vence, a Registered Professional Reporter and Notary Public within and for the State of Ohio, taken at the offices of Westen, Hurd, Fallon, Psiley & Howley, 2500 Professional Tower, Cleveland, Ohio, commencing at 9:22 a.m. the day and date above set forth. 15 So at this point in time, I'm here to ask you some questions because you've been identified as an expert by the defense in this case. Correct? 19 A Yes. 20 Q And if ask you any questions today that aren't clear, that you don't understand, please let me know that. 23 A Yes. 24 Q I'll try not do that, but it may happen. If you need to take a break, that's fine, just let 25 Yes. 24 Professional to do that, but it may happen. If you need to take a break, that's fine, just let 26 A Yes. 27 Me know. I would only ask that you don't take a break in the middle of a pending question 3 A Yes. 30 Debealf of the Plaintiff: James A. Marx, Esq. Tarow was the storect. Suite 350 Cleveland, Ohio 44113 30 Debealf of Defendant Jeffrey B. Remig. M.D.: Beverly A. Harris, Esq. Andrew Stienecker; Esq: Secore: James A. Mark, Esq. Tower Cleveland, Ohio 44113 31 On behalf of Defendants Dr. Rosso and Dr. Secore: James A. Mullin, Esg. Reainger & Reminger 237 W. Weshington Rew, Second Floor Sandueky, Ohio 44870 3
called by the Plaintiff of examination pursues to the Ohic Rules of Civil Proceeding. Laken a before me, the undersigned. Darlene Vance, a Registered Professional Reporter and Notary Public within and for the State of Ohic. Laken at the offices of Weston, Hurd, Fallon, Pataley & Howley. 2500 Terminal Tower Cleveland, Ohic Gammering at 9:22 a.m. the day and date above set forth. 2 AppEARANCES: 0 On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx, Esq. 2 Traci & Marx, Esq. 2 Traci & Marx, Esq. 2 On behalf of the Plaintiff: 3 James A. Marx, Esq. 3 Traci & Marx, Esq. 4 Traci & Marx, Esq. 4 Cleveland, Ohio 44113 5 On behalf of Defendant Jeffrey B. Romig, H.D.: Berweriy A. Marris, Esq. Meston, Hurd, Fallon, Prisley & Howley 200 Zor Farminal Tower 2 On behalf of Defendants Dr. Rosso and Dr. Second Floor 3 On behalf of Defendants Dr. Rosso and Dr. Second Floor 3 On behalf of Defendants Dr. Rosso and Dr. Second Floor 4 On behalf of Defendant Marcy Hespital 6 On behalf of Defendant Marcy Hespital 6 <t< th=""></t<>
 the Ohio Rules of Civil Proceedure, taken before me, the undersigned, Darlens Vance, a Registered Professional Reporter and Notary Public within and for the State of Ohio, taken at the offices of Weston, Hurd, Fallon, Patsley & Howley, 2500 Terminal Tower, Cleveland, Ohio, commencing at 9:22 a.m. the day and date above set forth. A Yes. <l< th=""></l<>
 the undersigned, Darlene Vance, a Registered professional Reporter and Notary Publis within and for the State of Ohio, taken at the offices of Weston, Hurd, Fallon, Paisley & Howley, 2500 Terminal Tower, Cleveland, Ohio, commencing at 9:22 a.m. the day and date above set forth. A Yes. Q And if I ask you any questions today that aren't clear, that you don't understand, please let me know that. A Yes. Q I'll try not to do that, but it may happen. If you need to take a break, that's fine, just let Merx. Esq. Thet & Herx. Th
for the State of Ohio, taken at the offices of Weston, Hurd, Fallon, Patisly & Howley, 2500 Terminal Tower, Cleveland, Ohio, commencing at 9:22 a.m. the day and date above set forth.19A Yes.2QAnd if I ask you any questions today that aren't clear, that you don't understand, please let me know that.20QAnd if I ask you any questions today that aren't clear, that you don't understand, please let me know that.224421me know that, but it may happen. If you need to take a break, that's fine, just let22441me know. I would only ask that you don't take a break in the middle of a pending question break in the middle of a pending question A Yes.43A Yes.2441me know. I would only ask that you don't take a break in the middle of a pending question break in the middle of a pending question A Yes.45James A. Marx, Esq. Tarot & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113246A Yes.9A I am employed by Emergency Professional services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.1110behalf of Defendants Dr. Rosso and Dr. Secori: Jeanne M. Hullin, Esq. Reminger & Reminger 237 M. Washington Row, Second Floor Sandusky, Ohio 4487011116Q I'm handing you what I've had marked as Exhibit 1. This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
Weston, Hurd, Fallon, Paisley & Howley, 2500 13 A 1 data Terminal Tower, Cleveland, Ohio, 24113 2 2 a.m. the day and date above set forth. 2 2 a.m. the day and date above set forth. 2 2 a.m. the day and date above set forth. 2 2 a.m. the day and date above set forth. 2 4 APPEARANCES: 2 4 On behalf of the Plaintiff: 3 4 James A. Marx, Esq. 7 2 Traci & Marx 5 4 On behalf of Defendant Jeffrey B. Romig, M.D.: 3 A Yes. Beverly A. Harris, Esq. 7 Q Could you tell me your professional address, Andrew Stienecker, Esq. 7 Q Could you tell me your professional On behalf of Defendant Jeffrey B. Romig, M.D.: 8 A Yes. Beverly A. Harris, Esq. 7 Q Could you tell me your professional Andrew Stienecker, Esq. 8 I am employed by Emergency Professional Services, which is in Middleburg Heights. I work alst. Vincent Charity Hospital On behalf of Defendant Br. Rosso and Dr. Secor: Jeanne M. Mullin,
a.m. the day and date above set forth. a.m. the day and date above set forth. a A Yes. a A Ye
21 clear, that you don't understand, please let the 22 know that. 23 A Yes. 24 Q I'll try not to do that, but it may happen. If 25 you need to take a break, that's fine, just let 26 me know. I would only ask that you don't take a 27 4 28 me know. I would only ask that you don't take a 29 you need to take a break, that's fine, just let 20 understaint, please let in 21 me know. I would only ask that you don't take a 22 appearances: 24 1 25 me know. I would only ask that you don't take a 26 appearances: 27 4 28 appearances: 29 A Yes. 20 - and you answer unless some privileged 30 behalf of Defendant Jeffrey B. Romig, M.D.: 30 behalf of Defendant Spr. Rosso and 31 Weston, Hurd, Failon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 257 W. Mashington Row, Second Floor 33 30 behalf of Defendant Mercy Hospital
23 A Yes. 24 Q I'll try not to do that, but it may happen. If you need to take a break, that's fine, just let 2 4 APPEARANCES: 1 On behalf of the Plaintiff: 3 James A. Marx, Esq. 1 Tract & Marx 5 1370 West & 6th Street, Suite 350 2 Cleveland, Ohio 44113 4 On behalf of Defendant Jeffrey B. Romig, M.D.: 8 Beverly A. Harris, Esq. 7 Andrew Stienecker, Esq. 9 A Yes. 9 Cleveland, Ohio 44113 5 On behalf of Defendants Dr. Rosso and Dr. Secor: 9 Jeanne M. Mullin, Esq. Reminger Standards Or. Reminger R Reminger 237 W. Washington Row, Second Floor 1 Sendusky, Ohio 44870 1 On behalf of Defendant Mercy Hospital 1 Of behalf of Defendant Mercy Hospital 1 On behalf of Defendant Mercy Ho
24 Q I'll try not to do that, but it may happen. If 25 you need to take a break, that's fine, just let 4 2 4 APPEARANCES: 1 me know. I would only ask that you don't take a On behalf of the Plaintiff: james A. Marx, Esq. 7 James A. Marx, Esq. Traci & Marx 1 Traci & Marx 1370 West 6th Street, Suite 350 6 Cleveland, Ohio 44113 4 2 and you answer unless some privileged 0n behalf of Defendant Jeffrey B. Romig, M.D.: 8 Please? 9 A I am employed by Emergency Professional address, 9 A I am employed by Emergency Professional Services, which is in Middleburg Heights. I 11 work at St. Vincent Charity Hospital which is on 12 12 Jeanne M. Mullin, Esq. 14 Reminger & Reminger 237 W. Washington Row, Second Floor 14 14 (Plaintiffs Exhibit No. 1 was marked.) 15 16 16 Vim handing you what I've had marked as Exhibit 17 17 1. This was provided to me and appears to be a
25 you need to take a break, that's fine, just let APPEARANCES: 4 On behalf of the Plaintiff: 4 James A. Marx, Esq. 7 Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113 6 On behalf of Defendant Jeffrey B. Romig, M.D.: 8 Beverly A. Harris, Esq. 4 Andrew Stienecker, Eq. 4 Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113 5 On behalf of Defendants Dr. Rosso and Dr. Secor: 1 Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor 14 On behalf of Defendant Mercy Hospital 15 On behalf of Defendant Mercy Hospital 10 Services, which is in Middleburg Heights. I 11 Weston; Wurde Attrianger 13 On behalf of Defendants Dr. Rosso and Dr. Secor: 14 On behalf of Defendant Mercy Hospital 15 On behalf of Defendant Mercy Hospital 10 On behalf of Defendant Mercy Hospital 11 On behalf of Defendant Mercy Hospital 12 On behalf of
APPEARANCES: On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113 On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fellon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113 On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sendusky, Ohio 44870 On behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital Andrew Steine Cleveland, Ohio 44870 On behalf of Defendant Mercy Hospital Andrew Steine Cleveland, Ohio 44870 On behalf of Defendant Mercy Hospital On behalf of Defendant Mercy Hospital
APPEARANCES: On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113 On behalf of Defendant Jeffrey B. Romig, M.D.:: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fellon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113 On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sendusky, Ohio 44870 On behalf of Defendant Mercy Hospital of Willard: Dn behalf of Defendant Mercy Hospital of Willard: Dn behalf of Defendant Mercy Hospital On behalf of Defendant Mercy Hospital On behalf of Defendant Mercy Hospital On behalf of Defendant Mercy Hospital Dn behalf of Defendant Mercy Hospital Dn behalf of Defendant Mercy Hospital
APPEARANCES: On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 44113 On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Meston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113 On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870 On behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital of behalf of Defendant Mercy Hospital on behalf of Defendant Mercy Hospital
On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 441132break in the middle of a pending question 3On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tor Energiand, Ohio 441132break in the middle of a pending question 3On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tor Energiand, Ohio 441137QOn behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 448701andrew stienecker, Esq. 4 l am employed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on 12On behalf of Defendant Mercy Hospital of Willard:1(Plaintiff's Exhibit No. 1 was marked.) Con behalf of Defendant Mercy Hospital and willard:On behalf of Defendant Mercy Hospital of Willard:01Corect, Doctor?
On behalf of the Plaintiff: James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 441133 A Yes.On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441137 Q Could you tell me your professional address, please?On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohie 448707 Q Ciude you tell me your professional address, please?On behalf of Defendant Mercy Hospital of Willard:9 A I am employed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.0 n behalf of Defendant Mercy Hospital of Willard:10 n behalf of Defendant Mercy Hospital of Willard:11 n11 n Work at St. Vincent Charity Hospital (Plaintiff's Exhibit No. 1 was marked.)12 East 22 Street in Cleveland, Ohio13 n14 (Plaintiff's Exhibit No. 1 was marked.)15 n16 Q I'm handing you what I've had marked as Exhibit 17 Nois was provided to me and appears to be a CV of yours. Is that correct, Doctor?
James A. Marx, Esq. Traci & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 4411334Q and you answer unless some privileged objection is being raised by counsel.On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441137QCould you tell me your professional address, please?On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870AYes.On behalf of Defendant Mercy Hospital of Willard:1The State Council Clevel and, Ohio 44870AYes.On behalf of Defendant Mercy Hospital of Willard:0Percent AltricePercent AltriceYes.On behalf of Defendant Mercy Hospital of Willard:0Percent AltricePercent AltriceYes.On behalf of Defendant Mercy Hospital of Willard:0Percent AltricePercent AltriceOn behalf of Defendant Mercy Hospital of Willard:0Percent AltricePercent AltriceOn behalf of Defendant Mercy Hospital of Willard:0Percent AltricePercent AltriceOn behalf of Defendant Mercy Hospital of Willard:1This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
17act & Marx 1370 West 6th Street, Suite 350 Cleveland, Ohio 441135objection is being raised by counsel.On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441135objection is being raised by counsel.On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 2370 W. Washington Row, Second Floor Sandusky, Ohio 448705objection is being raised by counsel.On behalf of Defendant Mercy Hospital of Willard:6A Yes.On behalf of Defendant Mercy Hospital of Willard:7Q Could you tell me your professional address, please?9A I am employed by Emergency Professional Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 4487010behalf of Defendant Mercy Hospital af Willard:1
1370 West 6th Street, Suite 350 Cleveland, Ohio 441135objection is being raised by counsel.On behalf of Defendant Jeffrey B. Romig, M.D.: Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441135Objection is being raised by counsel. 6On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 448705objection is being raised by counsel. 6On behalf of Defendant Mercy Hospital of Willard:5objection is being raised by counsel. 66A Yes.7Q Could you tell me your professional address, please?9A I am employed by Emergency Professional Services, which is in Middleburg Heights. I uwork at St. Vincent Charity Hospital which is on 1212East 22 Street in Cleveland, Ohio.1314(Plaintiff's Exhibit No. 1 was marked.) 1516Q I'm handing you what I've had marked as Exhibit 17171. This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
On behalf of Defendant Jeffrey B. Romig, M.D.:0A Yes.Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441137QCould you tell me your professional address, please?On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 448707QCould you tell me your professional address, please?On behalf of Defendant Mercy Hospital of Willard:0A I am employed by Emergency Professional work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.12Last 22 Street in Cleveland, Ohio.1314(Plaintiffs Exhibit No. 1 was marked.) 1516Q I'm handing you what I've had marked as Exhibit 17171. This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441138please?On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 448708please?On behalf of Defendant Mercy Hospital of Willard:9A I am employed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.0101011111112111314(Plaintiff's Exhibit No. 1 was marked.)1516Q I'm handing you what I've had marked as Exhibit 17171. This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
Beverly A. Harris, Esq. Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 441138please?On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 448708please?On behalf of Defendant Mercy Hospital of Willard:8please?9A I am employed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio. 131114(Plaintiff's Exhibit No. 1 was marked.) IS1516Q I'm handing you what I've had marked as Exhibit 1718CV of yours. Is that correct, Doctor?
Andrew Stienecker, Esq. Weston, Hurd, Fallon, Paisley & Howley 2500 Terminal Tower Cleveland, Ohio 44113 On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870 On behalf of Defendant Mercy Hospital of Willard: A lam employed by Emergency Professional Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio. 13 (Plaintiff's Exhibit No. 1 was marked.) 15 (Plaintiff's Exhibit No. 1 was marked.) 16 Q I'm handing you what I've had marked as Exhibit 17 1. This was provided to me and appears to be a CV of yours. Is that correct, Doctor?
2500 Terminal Tower Cleveland, Ohio 4411310Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 4487010Services, which is in Middleburg Heights. I work at St. Vincent Charity Hospital which is on East 22 Street in Cleveland, Ohio.On behalf of Defendant Mercy Hospital of Willard:11Work at St. Vincent Charity Hospital (Plaintiff's Exhibit No. 1 was marked.)Image: On behalf of Defendant Mercy Hospital of Willard:Image: On behalf of Defendant Mercy Hospital of Willard:Image: On behalf of Defendant Mercy Hospital of yours. Is that correct, Doctor?
Cleveland, Ohio 44113 On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870 On behalf of Defendant Mercy Hospital of Willard: On behalf of Defendant Mercy Hospital On behalf of Defendant Mercy Hospital
On behalf of Defendants Dr. Rosso and Dr. Secor: Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870 On behalf of Defendant Mercy Hospital of Willard: 12 East 22 Street in Cleveland, Ohio. 13 14 (Plaintiff's Exhibit No. 1 was marked.) 15 16 Q I'm handing you what I've had marked as Exhibit 17 1. This was provided to me and appears to be a 18 CV of yours. Is that correct, Doctor?
On behalf of Defendant Dr. Rosso and Dr. Secor:13Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 4487014(Plaintiff's Exhibit No. 1 was marked.)0n behalf of Defendant Mercy Hospital of Willard:130n behalf of Defendant Mercy Hospital of Willard:1314(Plaintiff's Exhibit No. 1 was marked.)151516Q I'm handing you what I've had marked as Exhibit171. This was provided to me and appears to be a 181818CV of yours. Is that correct, Doctor?
Jeanne M. Mullin, Esq. Reminger & Reminger 237 W. Washington Row, Second Floor Sandusky, Ohio 44870 On behalf of Defendant Mercy Hospital of Willard: 14 (Plaintiff's Exhibit No. 1 was marked.) 15 16 Q I'm handing you what I've had marked as Exhibit 17 1. This was provided to me and appears to be a 18 CV of yours. Is that correct, Doctor?
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On behalf of Defendant Mercy Hospital 18 CV of yours. Is that correct, Doctor?
of Willard:
Robison, Curphey & O'Connell 20 Q is there anything that should be added or Ninth Floor - Four Seagate 21 delated from that 2
Toledo, Ohio 43604
22 A There are several things. I have been
23 recertified in family practice within the last
24 year and a half. I now am an advanced hazardous 25 life support instructor. That's the pertinent

Deposition of Gayle Galan, M.D., taken on March 26, 2003

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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21	Q Oka any arti A Yes Ma on Q And pos A Yes Q Are Q Are Q Are Col tea in ii I bo of r Q Wh are A Yes act	5 dates. ay. Looking at this briefly, I didn't notice y articles listed. Have you published any cles? s. In fact, I have published three articles. ybe that's not included in there. They're all asthma. d your teaching positions or faculty sitions, is that listed on here? s. e those current or were those positions that u held in the past? ey are current. I continue to teach both with se Western Reserve and Northeastern Ohio llege of Medicine. My ongoing hands-on ching experiences are that we have residents internal medicine at St. Vincent Charity, and oth lecture and also do clinical supervision esidents. at does that supervision involve? Is there an a of practice? Is it emergency medicine? s, in emergency medicine. The residents ually do rotations in the emergency partment and so they will assess patients,	14 15 16 17 18 19 20 21 22	Q AQ AQ A QAQAQ	breakdown on plaintiff versus defendants there? I testified once on behalf of the plaintiff and the others were defense. Did any of those previous cases involve issues related or similar to those presented in this case? No. Did any of those previous cases involve doctors or nurses who are involved in this case? No. When were you first contacted concerning the case we're here about today, the Risner case? A few months before I wrote my expert report. So the report was January 2, '02, so it was the end of 2001. So probably October, November. Who contacted you? It was Ms. Harris' assistant. And was that by telephone? Yes. And what, if anything, were you told at that point in time by Ms. Harris' assistant concerning this case? She informed me that this was a patient in Willard, Ohio, gave me the name of the physician	7				
24 25		her with me or just prior to my seeing the	24 25		involved, stated that this was involving a					
4 5 6 7	pat Q Do A No Q All in r A Yes Q And ma	ent, we discuss the patient, I evaluate the ent, compound. you have a private practice as well? That is my practice, emergency medicine. ight. Have you been deposed or testified hedical malpractice cases before? I starting with depositions, how often or how by times previous to today have you given ositions in these kinds of cases?			patient with a stroke and would I be would I have a conflict in reviewing that and I said no. Was there any follow-up communication, then, either in writing or by telephone from Ms. Harris? After that time, the assistant told me that she would forward me the records and that she would appreciate my calling back and saying whether I felt that this case was defendable or not. That's, in fact, what I did, is that I called	8				
11 12 13 14 15 16 17 18 19 20 21 22 23	A I be der Q And cas A Yes Q And der is t A For a der pro two Q Wit	elieve I've now been in about 10 to 12 positions. d have you testified in court in a malpractice se? s. I've testified, I believe, five times. d of those 10 to 12 times when you've given positions, can you tell me what the breakdown between plaintiff and defendant doctors? r plaintiff, as far as depositions, it's about a little less than a third of those positions. As far as overall cases, I've abably reviewed about a third plaintiff and between the five times you actually tified in court, can you give me the	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 g Se	A Q A Q A	back and said that I felt the case was defendable and she requested an expert report. Do you recall the name of the assistant that you were dealing with? Joellen Leach. MS. HARRIS: She's a paralegal, just so you know. Have you been retained by Weston, Hurd, the law firm that Ms. Harris works for, on previous cases? Yes. I believe two. And what lawyer here at Weston, Hurd retained you? Was it Ms. Harris or other lawyers? The I believe this is the first time with Ms. Harris being here at Weston, Hurd. I	I				
	Cady Reporting Services, Inc.									