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Case : SANDRA NEWSOME vs. MOHAMMAD RASHID , M.D.
Testimony Date : December 12, 2003
Expert Witness : PAUL PRIEBE M.D.
Expert Type : Surgery - General
Court : State: Ohio County: TOUMBULL
Pages : 109

Sandra Newsome
vs.
Mohammad Rashid, M.D., et al.

Trumbull County Court of Common Pleas
Case No. 02 CV 512
Judge McKay

Deposition of Paul P. Priebe, M.D.
Friday - December 12, 2003

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IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO

- - -

SANDRA NEWSOME,)
Plaintiff,)

vs.) Case No. 02 CV 512

MOHAMMAD RASHID, M.D.,) JUDGE MCKAY
et al.,)
Defendants.)

- - -

Deposition of PAUL P. PRIEBE, M.D., a
Witness herein, called by the Defendants for
cross-examination pursuant to the Ohio Rules
of Civil Procedure, taken before me, the
undersigned, Kelley E. Spears, a Notary Public
in and for the State of Ohio, at MetroHealth
Medical Center, 2500 MetroHealth Drive,
Cleveland, Ohio, on Friday, the 12th day of
December, 2003, at 12:42 o'clock p.m.

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3

1 PAUL P. PRIEBE, M.D.
2 of lawful age, a Witness herein, called for
3 examination, as provided by the Ohio Rules of
4 Civil Procedure, being by me first duly sworn,
5 as hereinafter certified, deposed and said as
6 follows:

7 CROSS-EXAMINATION

8 BY MR. HUDAK:
9 Q. Good afternoon, Doctor. Would you tell
10 us your name.
11 A. Paul Preston Priebe.
12 Q. Your Social Security number?
13 A. 387-46-6561.
14 Q. Your age, sir?
15 A. 56.
16 Q. Your professional address?
17 A. 2500 MetroHealth Drive, Cleveland, Ohio
18 44109.
19 Q. Approximately how long has that been
20 your professional address?
21 A. Since December of 1988.
22 Q. Do you maintain any other professional
23 addresses?
24 A. No.
25 Q. All right. Tell us about what it is

2

APPEARANCES:

On Behalf of the Plaintiff:
Traci & Marx
By: Robert V. Traci, Attorney at Law
1370 West Sixth Street
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On Behalf of the Defendants:
Roetzel & Andress, L.P.A.
By: Michael J. Hudak, Attorney at Law
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I N D E X

Exhibit No.	Page:Line
Defendant's Exhibit A	22:5
Defendant's Exhibit B	41:13
- - -	
Examination By:	Page:Line
Mr. Hudak	3:8
- - -	

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4

1 that you do. What is your specialty and what
2 do you do in that field of specialty?
3 A. Well, I would be classified as a general
4 surgeon, but my areas of expertise are in
5 gastrointestinal surgery and endoscopy. I also
6 do complicated abdominal wall reconstruction or
7 hernia.
8 That's -- and I -- my -- my
9 responsibilities here are primarily clinical
10 although this is a teaching hospital. I don't
11 have any specific research responsibilities or
12 overwhelming administrative responsibilities.
13 Q. All right. You say no overwhelming.
14 Can you identify what it is that you do in
15 the area of administrative or research?
16 A. Virtually nothing.
17 Q. Okay. When you say it is primarily
18 clinical, is your responsibilities here -- how
19 do you define clinical?
20 A. Taking care of patients.
21 Q. Are you able to tell us the surgeries
22 that you identified -- in addition to being a
23 general surgeon, you identified
24 gastrointestinal endoscopy. Can you give us
25 some idea of the breakdown of the surgeries