



This is just a two page sample of the full transcript. If you would like to purchase this transcript please go here:  
<http://www.crossexam.com/viewcase/8337.html>

Case : Anderson v GRMC  
Testimony Date : August 12, 2011  
Expert Witness : David Plourd M.D.  
Expert Type : Obstetrics / Gynecology  
Court : State: Michigan County: Genesee  
Pages : 92

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

LIBBEY BRYSON, as Next Friend  
of ASIA ANDERSON, a Minor,

Plaintiff,

vs. CASE NO. 10-92893-NH

JENNIFER L. TRACY, R.N.,  
STACEY A. NELSON, R.N.,  
CAROL POWERS, D.O.,  
WOMEN'S SPECIALTY ASSOCIATES,  
P.C., HOLLY JASKIERNY, D.O.  
and GENESYS REGIONAL MEDICAL  
CENTER, Jointly and Severally,

Defendants.

-----

DEPOSITION OF  
DAVID PLOURD, M.D.

August 12, 2011  
10:04 a.m.

402 West Broadway  
Suite 1600  
San Diego, California

Renee Kelch, RPR, CLR, CSR No. 5063

3

INDEX TO EXAMINATION  
WITNESS: DAVID PLOURD, M.D.

EXAMINATION	PAGE
BY MR. SHIMMEL	5
BY MR. MacDONALD	71
BY MR. SHIMMEL	90

2

APPEARANCES OF COUNSEL

For the Plaintiff:  
McKEEN & ASSOCIATES  
JODY AARON, ESQ.  
Suite 4200  
645 Griswold Street  
Detroit, Michigan 48226  
313.961.4400  
313.961.5985 Fax  
jlaaron@mckeenassociates.com

For Defendants Jennifer L. Tracy, R.N., Stacey A. Nelson, R.N., Holly Jaskierny, D.O., and Genesys Regional Medical Center:  
KITCH DRUTCHAS WAGNER VALITUTTI & SHERBROOK  
Thomas R. Shimmel, ESQ.  
Suite 2400  
One Woodward Avenue  
Detroit, Michigan 48226  
313.965.6953  
313.965.7403 Fax  
thomas.shimmel@kitch.com

For Defendants Women's Specialty Associates, P.C. and Carol Powers, D.O.  
CLINE CLINE & GRIFFIN, PC  
J. BRIAN MacDONALD, ESQ.  
Suite 1000  
503 S. Saginaw Street  
Flint, Michigan 48502  
810.232.3141  
810.232. 1079 Fax  
bmacdonald@ccglawyers.com

4

INDEX TO EXHIBITS

EXHIBITS	DESCRIPTION	MARKED
1	Handwritten notes	27
2	Typed notes and articles	31
(Original exhibits attached to original transcript)		



5

1 DEPOSITION OF DAVID PLOURD, M.D.  
 2 AUGUST 12, 2011  
 3  
 4 DAVID PLOURD, M.D.,  
 5 having been first duly sworn, testifies as follows:  
 6  
 7 EXAMINATION  
 8 BY MR. SHIMMEL:  
 9 Q. Please state your full name for the record,  
 10 Doctor.  
 11 A. David Plourd.  
 12 MR. SHIMMEL: Let the record reflect that this  
 13 is the discovery deposition of Dr. David Plourd being  
 14 taken pursuant to notice and agreement by counsel and  
 15 will be used for all purposes allowed under the Michigan  
 16 Court Rules.  
 17 BY MR. SHIMMEL:  
 18 Q. Doctor, what's your current business address?  
 19 A. Essentially it's the same as my own address  
 20 since I work as an independent contractor at several  
 21 hospital-based practices but don't have an office.  
 22 Q. And that's on your CV?  
 23 A. It is.  
 24 Q. And could you please describe your current  
 25 practice?

6

1 A. My full-time practice is as an obstetric  
 2 hospitalist or laborist. And I do that at Scripps  
 3 Encinitas Hospital.  
 4 I still maintain my full-time academic  
 5 appointments, though -- I'm sorry, not full time. I  
 6 still maintain my full academic appointment at both  
 7 UC San Diego Department of ObGyn and the Naval Medical  
 8 Center, San Diego, in their department of ObGyn.  
 9 Q. Okay. You said you were a hospitalist or  
 10 laborist at Scripps Hospital?  
 11 A. Yes.  
 12 Q. And what do you do there? How much of your  
 13 time is devoted to that hospital?  
 14 A. Full time. Three 13-hour shifts a week,  
 15 typically.  
 16 Q. And is there an ObGyn residency program there?  
 17 A. There is not.  
 18 So I'm actually doing pretty much the same job  
 19 as Dr. -- now I'll mispronounce her name. Dr. J --  
 20 MS. AARON: Jaskierny?  
 21 THE WITNESS: Jaskierny. Thank you. I'll keep  
 22 that in mind. Dr. Jaskierny. But for my lack of  
 23 residents in my situation.  
 24 BY MR. SHIMMEL:  
 25 Q. So you're employed by Scripps Hospital here in

7

1 San Diego?  
 2 A. Actually employed by -- the firm is called  
 3 Connect the Docs, but that is just basically a  
 4 contracting agency between Scripps and a panel of  
 5 obstetricians. Yes.  
 6 Q. So you're employed by Connect the Docs, and  
 7 then they place you at Scripps?  
 8 A. Yes.  
 9 Q. And you work there three 13-hour shifts a week?  
 10 A. Yes. Then an occasional 18-hour shift on  
 11 Sundays, just to be complete.  
 12 Q. How long have you been doing that?  
 13 A. Four two to three years.  
 14 And prior that I did the same thing but at a  
 15 different hospital called Tri-City hospital in  
 16 Oceanside.  
 17 Q. Is this all labor and delivery care, or do you  
 18 provide prenatal care as well?  
 19 A. All labor and delivery care as far as the  
 20 hospitalist positions.  
 21 Q. What kind of patients do you treat? What I  
 22 mean by that, are these private patients of doctors?  
 23 Are they clinic patients at the hospital? How is it  
 24 determined what patients you treat?  
 25 A. They are private patients of the physicians.

8

1 Currently there are several groups, group  
 2 practices of obstetrics that sign out to us each and  
 3 every night. In addition, we would take an unsponsored  
 4 patient should some patient traveling through San Diego  
 5 develop an obstetric issue. She might just pull into  
 6 the hospital. That would certainly be my purview to see  
 7 her as opposed to any of the private physicians being  
 8 called in.  
 9 And the ultimate goal of the panel is that  
 10 we'll cover for all obstetricians that practice at  
 11 Scripps. So we would do all the deliveries. But right  
 12 now it's an emerging model, if you will.  
 13 Q. And you said about two to three years. When  
 14 did you start at Scripps? Do you have a date, month and  
 15 a year?  
 16 A. I'd have to actually look at my own CV to put  
 17 that timeline together. Pardon me.  
 18 Q. Yes. Please do that.  
 19 A. So it would have been May 2009 to the present.  
 20 And then prior I was an obstetrics hospitalist  
 21 at Tri-City. And that started in December of 2006. And  
 22 I still remain on staff there. Though not very active  
 23 there since I much prefer the patient population at  
 24 Scripps.  
 25 Q. As far as what you do at Scripps, I assume it's

