



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/8247.html>

Case : JOSEPHINE HORTON vs. THE CLEVELAND CLINIC FOUNDATION
Testimony Date : February 23, 1999
Expert Witness : ALAN LICHTIN M.D.
Expert Type : Hematology (Blood)
Court : State: Ohio County: Cuyahoga
Pages : 201

State of Ohio, }
County of Cuyahoga. } SS:

IN THE COURT OF COMMON PLEAS

JOSEPHINE HORTON, etc.,
vs. Plaintiff,
THE CLEVELAND CLINIC
FOUNDATION, et al., Defendants.

Case No. 348894
Judge Anthony O.
Calabrese

THE DEPOSITION OF ALAN E. LICHTIN, M.D.
TUESDAY, FEBRUARY 23, 1999

The deposition of ALAN E. LICHTIN, M.D.,
called by the Plaintiff for examination pursuant to the
Ohio Rules of Civil Procedure, taken before me, the
undersigned, Robert J. Wanous, Notary Public
within and for the State of Ohio, taken at the
Cleveland Clinic, 9500 Euclid Avenue, Cleveland, Ohio,
commencing at 2:45 p.m., the day and date above set
forth.

- - - - -

1		
2		INDEX PAGE
3	EXHIBIT	PAGE
4	A	5
5	B	10
6	C	80
7	D	82
8	E	89
9	F	90
10	G	94
11	H	98
12	I	101
13	J	106
14	K	107
15	L	110
16	M	111
17	N	112
18	O	
19	EXAM BY	PAGE
20	MR. TRACI	4
21	MR. SADLOWSKI	134
22	MR. CASEY	136
23	MR. SADLOWSKI	138
24	MR. TRACI	139

1
2 APPEARANCES:
3 On behalf of the Plaintiff:
4 Robert V. Traci, Esq.
5 Traci & Marx
6 1550 Illuminating Building
7 Cleveland, Ohio 44113
8 On behalf of the Defendant Cleveland Clinic:
9 William D. Bonezzi, Esq.
10 Bonezzi, Switzer, Murphy & Polito
11 1400 Leader Building
12 Cleveland, Ohio 44114
13 On behalf of the Defendants Dr. Nedorost and
14 Associates in Dermatology, Inc:
15 James S. Casey, Esq.
16 Reminger & Reminger Co. LPA
17 7th Floor The 113 St. Clair Building
18 Cleveland, Ohio 44114
19 On behalf of the Defendant Dr. Kantharaj:
20 Jeffrey R. Sadlowski, Esq.
21 Ulmer & Berne LLP
22 Suite 900 Bond Court Building
23 Cleveland, Ohio 44114
24
25

1 ALAN E. LICHTIN, M.D.
2 of lawful age, called by the Plaintiff for
3 examination pursuant to the Ohio Rules of Civil
4 Procedure, having been first duly sworn, as
5 hereinafter certified, was examined and
6 testified as follows:
7 - - - - -
8 EXAMINATION OF ALAN E. LICHTIN, M.D.
9 BY MR. TRACI:
10 Q Doctor, my name is Bob Traci and I represent the
11 Horton family. If you don't understand any of
12 my questions, just let me know and I will try to
13 rephrase them. Okay? And it is really more
14 important for him to hear what you are saying,
15 so he can get it down. So if you just verbalize
16 your answers, whatever they may be. Okay?
17 A Okay.
18 Q Would you state your name and professional
19 address, please.
20 A Alan Eli Lichtin, Cleveland Clinic, 9500 Euclid
21 Avenue, Cleveland, Ohio 44195.
22 Q What is your date of birth, Doctor?
23 A November 12, 1955.
24 Q And you practice what speciality?
25 A Hematology and medical oncology.

1 Q And are you board certified in any particular
2 speciality?
3 A Three. Internal medicine, hematology, and
4 medical oncology.
5 Q Do you have a CV that is coming from somebody?
6 A My secretary is typing it now.
7 Q Then we'll attach that as Exhibit A to the
8 deposition.
9 MR. BONEZZI: That is fine.
10 MR. TRACI: Any problem with
11 that?
12 MR. BONEZZI: Not if we all
13 get a copy.
14 MR. TRACI: Right. That is
15 up to Mr. Wancous. He hoards those things
16 sometimes.
17 Q Can you tell me, I don't want to get into a lot
18 of detail of it, about where did you go to
19 medical school?
20 A University of Cincinnati Medical School.
21 Q And when did you graduate?
22 A 1980.
23 Q And you did some residencies thereafter?
24 A University Hospitals of Cleveland for three
25 years, internship, and two years of residency.

1 Q Okay. Were you originally from Ohio?
2 A Cincinnati.
3 Q Cincinnati? Okay.
4 A Yes.
5 Q And have you been at the Cleveland Clinic since
6 you started practicing?
7 A I have been here since 1988. I was a fellow at
8 the University of Pennsylvania in Philadelphia
9 for three years, then I was on the faculty at
10 the University of Missouri in Kansas City for
11 about two and a half years and then came here.
12 Q Okay. What is medical oncology?
13 A It is the study of cancer. In contradiction to
14 surgical oncology, which is using surgery,
15 medical oncology is using chemotherapy.
16 Q It seems to me that every oncologist I have run
17 into was a hematologist also?
18 A Not necessarily so.
19 Q But an awful lot of hematologists also have a
20 sister practice, if you will, in oncology?
21 A It is very common.
22 Q Why is that?
23 A Well, to be a strict hematologist, usually you
24 have to be laboratory based, for example,
25 running a coagulation laboratory. A lot of the

1 history of oncology arose out of the history of
2 hematology, so a lot of people have both boards.
3 Q It is my understanding, and correct me if I am
4 wrong, that Mr. Horton was initially referred to
5 the Cleveland Clinic to your service; is that
6 correct?
7 A My understanding and then remembering going
8 through the chart, is I saw him on September
9 16th, as an appointment in the outpatient
10 clinic.
11 Q That was on referral, as I understand, from Dr.
12 Kantharaj, or do you know?
13 A I can't really remember that. Usually when
14 there is a referral, I put a note in my -- first
15 saying "referred by Dr. Kantharaj." I may not
16 have said that right there on the sheet.
17 Q You don't recollect?
18 A I don't really recollect whether it was referral
19 or whether he came on his own. I don't
20 remember.
21 Q Do you know a Dr. Andresen
22 A Yes.
23 Q Am I saying that right?
24 A Andresen.
25 Q Is he also --

1 A Yes, he is.
2 Q -- is he in the same department?
3 A Yes.
4 Q Okay. In any event, on September the 16th, you
5 had an appointment with him and Mr. Horton came
6 in?
7 A Yes.
8 Q What was your understanding of the reason for
9 that first appointment?
10 A He had an elevation of his eosinophils, which is
11 a type of white blood cell, and that is the
12 reason for the consultation.
13 Q Okay.
14 A Or the reason for the visit.
15 Q Do you know where you got that information from,
16 that he had that elevation? Is that from the
17 patient? Did you have any other materials
18 provided to you?
19 A Again, I can't remember exactly, but he
20 presumably brought records with him that had
21 that in there.
22 Q Do you have a current recollection of Mr. Horton
23 and your care and treatment of him?
24 A Do I --
25 Q Do you have a current recollection of him? Can