

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE MIDDLE DISTRICT OF FLORIDA  
3                   ORLANDO DIVISION  
4                   CASE NO.: 5:02-cv-131-Oc-10GRJ  
5

6 UNITED STATES OF AMERICA

7 ex.Rel. KARYN L. WALKER,  
8           Plaintiff,

9 vs.

10 R & F PROPERTIES OF LAKE COUNTY, INC.,  
11 a Florida professional association,

12                   Defendant.  
13

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14 DEPOSITION OF: LORNA GAIL MAYER

15 TAKEN BY: The Plaintiff

16 DATE: March 18, 2004

17 TIME: 9:07 a.m. until 3:45 p.m.

18 LOCATION: 301 East Pine Street  
19 Suite 1400  
Orlando, Florida 32802

20 REPORTED BY: Deborah J. Harris, Court Reporter  
21 Notary Public, State of Florida  
22 at Large  
23  
24  
25



Because sometimes a batch will be two and  
screens long.

Q Okay. And will this -- When you pull up  
this for a certain patient, is there going to be one  
of these pieces of paper for each and every claim?  
Do you know what I mean?

Like, this is claim 66. Is there a claim 65  
somewhere in your computer for this patient?

A You have to bring each claim up  
individually.

Q Separately?

A Uh-huh.

Q Can you tell from there, I guess that  
would be the -- it might be the procedure code.  
That might be the answer.

But could you tell from this what services were  
provided?

A Uh-huh. An office visit only.

Q Do you know what actually happened, what  
the diagnosis was, anything like that?

A (Shakes head.) There's another screen you  
can view the diagnosis but you can't get it all on  
one screen.

Q Okay. So, for example, is there any way  
to tell just from this piece of paper if a new

Q The last one was GM13, you said the 13 was  
the date or something, so this one was you on the  
second of whatever?

A Exactly.

Q The account number is the patient's  
account number, correct?

A Correct.

Q Class MC, MCS, it's the same as the last  
one, right?

A Yes.

Q So in this one I've got there's three  
different dates under date. Can you tell which date  
was --

A The day the patient was seen was April 26.

Q I see. Okay. And then where it says  
post, you said that's the date that it was batched,  
so is that the date when we were talking about when  
Patsy got the stuff and batched it?

A Well, when the girls turn in the batch to  
Patsy and she reviews it. Then, time permitting,  
sometime that day, but if it's five o'clock then  
it'll get posted the next day. Insurance won't  
process until the batch has been posted.

Q Right. So that would be the date that  
Patsy would then be able to get to it and be able to

diagnosis was made for this existing patient?

A Not from this screen.

Q Is there any way to tell if, like, there's  
a change in their treatment plan from this screen?

A (Shakes head.)

Q Is that no, just for the record?

A No. I'm sorry.

Q That's okay.

A Pretty much you would have to pull the  
chart.

Q Got 'cha. I only made a few of these  
copies so I think I'm just trying to get a general  
idea of how these go so I'm going to go over a  
couple more with you. If we've already seen them we  
can go through them quicker.

MS. JOHNSON: We can mark that one as 24,  
please.

(PLAINTIFF'S EXHIBIT NO. 24 WAS  
MARKED FOR IDENTIFICATION.)

Q Is this a similar type form? I think it  
is but --

A Uh-huh.

Q So, again, this one will go a lot quicker.  
The first one batch GMO2, is that you again?

A Yes, that's me.

post it, okay?

A Yes.

Q So, for example, then the Medicare  
payment, the claim date and the post date are the  
same day; so she happened to get it and be able to  
do that on the same day, correct?

A Yes.

Q This shows office brief service. Is this  
what you were talking about before, different  
service?

A Level of service, yes.

Q You still can't tell from here what the  
diagnosis was from this page right here, correct?

A Correct.

Q Do you know what that INC check means?

A Probably should be INS, insurance check.

Q Is the description of service something  
that's filled in by hand or is that a code that pops  
up within your program?

A When they key in, when they take  
whatever's been checked by the provider and key in  
99213 that description pops up.

Q I'm not sure if I asked this before. What  
does the MWO mean?

A Medicare write-off. When you've got the

1 chart would tell you that.  
 2 Q Okay. And can you tell, I'm assuming it's  
 3 no, but can you tell if the patient plan has been  
 4 changed from the diagnosis?  
 5 A No. Only from dictation.  
 6 Q And what was this LLO for again?  
 7 A Lady Lake.  
 8 Q Lady Lake, okay. So whatever that was was  
 9 billed for \$32, Medicare will take off the \$7.11  
 10 automatically; is that what that means?  
 11 A Uh-huh.  
 12 Q And there must have been a check also?  
 13 A Well, probably the patient had another  
 14 hundred dollar Medicare deductible, so they paid the  
 15 whole thing. Medicare wasn't going to pay any of  
 16 it.  
 17 Q So the patient probably just wrote a check  
 18 anyway?  
 19 A And paid it because they knew they hadn't  
 20 met their deductible.  
 21 Q So would this have been billed to Medicare  
 22 if the patient paid with a check?  
 23 A Yes, you still have to bill it to apply  
 24 for the deductible for the patient.  
 25 Q Would LFM have received anything from

1 Medicare?  
 2 A No. I mean, yes. It'll come on the  
 3 explanation of benefit that that much has been  
 4 applied to their deductible. But no payment.  
 5 Q That is what I meant was payment from  
 6 Medicare, okay. All right.  
 7 MS. JOHNSON: Do you want a take a quick  
 8 break? I could use a quick little break.  
 9 THE WITNESS: Yes.  
 10 (BREAK WAS TAKEN AT 2:05 P.M.)  
 11 (BACK ON THE RECORD AT 2:16 P.M.)  
 12 BY MS. JOHNSON:  
 13 Q I want to go back for a second to the  
 14 Medicare update that you said you received  
 15 quarterly.  
 16 Did you review those when they came in?  
 17 A We had -- The office managers got one and  
 18 the insurance girls got one. And then sometimes I  
 19 got one depending on how many copies came in. But  
 20 we tried to have meetings and go over them for  
 21 anything that related to family practice.  
 22 Q Okay.  
 23 A Sometimes I wasn't always able to attend.  
 24 Q Were the meetings held just like quarterly  
 25 then after a manual was published?

1 A After an update came out, yes.  
 2 Q And those meetings would be attended then  
 3 by you, the office manager, or the insurance people?  
 4 A Yes, both office managers.  
 5 Q For Lady Lake and Leesburg?  
 6 A Yes.  
 7 Q Were those kind of just open forum  
 8 discussion about any questions about Medicare?  
 9 A We just tried to go through it page by  
 10 page.  
 11 MS. JOHNSON: Okay. Let me mark this  
 12 next. I think I'm on 28, right?  
 13 MR. BITTMAN: Yes.  
 14 (PLAINTIFF'S EXHIBIT NO. 28 WAS  
 15 MARKED FOR IDENTIFICATION.)  
 16 Q This should be a five page document,  
 17 business manager description, job description on the  
 18 top. And it looks like it was probably written or  
 19 there's a date of 4/93 on it, anyway?  
 20 A Uh-huh.  
 21 Q Does this look familiar to you?  
 22 A Yes.  
 23 Q Is this a description of your job as  
 24 business manager?  
 25 A Some of them have -- There are some new

1 things and some of them I have delegated to other  
 2 people.  
 3 Q Is there --  
 4 A But basically.  
 5 Q Is there a newer version that's actually  
 6 printed out?  
 7 A It's just been an ongoing transition.  
 8 Q Got 'cha. Have you seen this physical  
 9 piece of paper like this before, or pieces of paper  
 10 like this, in this format?  
 11 A Yes.  
 12 Q If you go to what's marked as 103, starts  
 13 weekly functions like in the middle of the page. It  
 14 looks like there might be something missing on the  
 15 top.  
 16 Have you ever seen anything with stuff on the  
 17 top? For example, 104 looks like there's stuff  
 18 missing?  
 19 A It might just be the way the printer --  
 20 The printer is set for so many lines and it prints a  
 21 lot of reports like this.  
 22 MR. BITTMAN: I have the original computer  
 23 printout and it has gaps.  
 24 MS. JOHNSON: Okay. It gets a little  
 25 confusing. Mark this for me, please, as 29.

1 to the deposition?

2 MR. BITTMAN: We'll have to redact the  
3 document before it's attached to the  
4 deposition. I'm also wondering, a lot of these  
5 are not Karyn's, right?

6 THE WITNESS: (Nods head.) All of them  
7 except two.

8 MR. BITTMAN: Right. So I don't know what  
9 happened here.

10 BY MS. JOHNSON:

11 Q The sixes are the ones that are Karyn's,  
12 correct?

13 A Correct.

14 Q So the only two that are Karyn's are the  
15 first ones, the numbers 000462015 and the last one?

16 A The fourth one and the last one.

17 Q The fourth one and the last one, okay.  
18 What does -- I'm just looking at the one where it  
19 says PP-NI, what does that mean?

20 A Private pay and no insurance.

21 Q Okay. I see. And what does the -- Next  
22 to the diagnosis codes, the LO, what does that mean?

23 A Lady Lake office.

24 Q What does the entry, I'm still looking at  
25 that fourth one, the entry CK 730, what does that

1 A Yes. And maybe the patient was private  
2 pay, turned 65, and changed it to, say, Medicare,  
3 but didn't change these first two letters.

4 Q I see. And do you know that, if, for  
5 example, this last one I guess is a Medicare one so  
6 you would bill Medicare for the \$32; you would  
7 expect to get back 80 percent of the 4.29, correct?

8 A Correct.

9 Q Can you tell whether that was received?

10 A No. Because when the batch comes in that  
11 would be in a different batch.

12 Q Would you have to look at these types of  
13 forms, Exhibit 23 and 24?

14 A The patient's account and that would show  
15 the whole claim.

16 MS. JOHNSON: Do you want that, Mike, so  
17 that you can --

18 MR. BITTMAN: Play with it.

19 MS. JOHNSON: -- do something with it  
20 first?

21 BY MS. JOHNSON:

22 Q I only made a couple more copies. I'm  
23 just making sure that I understand this. So I don't  
24 mean to bore you to death.

25 A No, that's all right.

1 mean?

2 A The patient's check number, 730.

3 Q So like a personal check number?

4 A Uh-huh.

5 Q And that gets inputted by the  
6 receptionist?

7 A Yes. And they paid the full amount.

8 Q I see. And then the bottom entry, first  
9 of all, those BR's, that's just a different person  
10 who did the batch, right?

11 A Correct.

12 Q And then that one says PP-M6, does that  
13 mean private pay, Medicare, or what does that mean?

14 A Private pay and Medicare. They don't have  
15 secondary.

16 Q Okay. And what does ATMY stand for?

17 A Medicare, yes. We're accepting Medicare.

18 Q Okay.

19 A If they have a secondary, say MCS for  
20 secondary insurance, pick up their co-pay.

21 Q I see.

22 A Some of them really should have had the  
23 PPCMC but it doesn't really matter.

24 Q So it should have said MC-MCS like the  
25 other ones?

1 MS. JOHNSON: We'll go through one more  
2 just so I'm sure we understand. Are we on 27?

3 MR. BITTMAN: Yes.

4 MS. JOHNSON: This is 27?

5 COURT REPORTER: Yes.

6 (PLAINTIFF'S EXHIBIT NO. 27 WAS  
7 MARKED FOR IDENTIFICATION.)

8 BY MS. JOHNSON:

9 Q Just going through this, I just want to  
10 make sure that I understand this one. So this is  
11 patient number and 01 tells you if it's a spouse or  
12 not.

13 Can you tell from here whether it's an existing  
14 patient or a new patient?

15 A Says office brief service, and code 99212  
16 is for established patient.

17 Q The code tells you whether it's  
18 established or not?

19 A Uh-huh.

20 Q And then the diagnosis code is the 34510,  
21 right?

22 A Uh-huh.

23 Q Can you tell from that diagnosis code  
24 whether it's a new diagnosis?

25 A (Shakes head.) Only the dictation in the