

1 BRADLEY S. MAINOR, ESQ.
 Nevada Bar No. 7434
 2 ASH MARIE BLACKURN, ESQ.
 Nevada Bar No. 14712
 3 **MAINOR WIRTH, LLP**
 4 6018 S. Fort Apache Road, Ste. 150
 Las Vegas, NV 89148-5652
 5 Tel: (702) 464-5000
 Fax: (702) 463-4440
 6 ash@mwinjury.com
 7 *Counsel for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 SONALOLITA WILSON

11 Plaintiff

12 vs.

13 UNITED STATES OF AMERICA ; LICETH
 DEMHA-SANTIAGO; JUAN DEMHA;
 14 DOES I THROUGH X; AND ROE
 CORPORATIONS 1 THROUGH X,
 15

16 Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

17 | **JOINT PRETRIAL**
 18 **ORDER**

17 COMES NOW Plaintiff, SONALOLITA WILSON (“Plaintiff” or “Wilson”), by and
 18 through her attorneys, BRADLEY S. MAINOR, ESQ., and ASH MARIE BLACKBURN, ESQ.,
 19 of MAINOR WIRTH LLP; and Defendants UNITED STATES OF AMERICA, LLC (“USA”), by
 20 and through their attorneys, SKYLER PEARSON, ESQ., and PATRICK ROSE, ESQ., of OFFICE
 21 OF UNITED STATES ATTORNEY DISTRICT OF NEVADA, Defendants LICETH DEMHA-
 22 SANTIAGO (“SANTIAGO”) and JUAN DEMHA (“DEMHA”) by and through their attorneys,
 23 STEVEN T. JAFFE, ESQ. AND JAN K. TOMASIK, ESQ. of HALL JAFFE & CLAYTON, LLP;
 24 and submit the Joint Pretrial Order pursuant to LR 16-3.

25 **I.**

26 **A. Summary of Action**

27 This is a personal injury action arising out of two motor vehicle collisions that occurred on
 28 September 1, 2016, between Plaintiff WILSON and Defendant USA and Plaintiff WILSON and

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1 DEMHA-SANTIAGO and DEMHA. Plaintiff was traveling eastbound on Washington Avenue,
2 approaching Saylor Avenue, in the eastbound lanes. Plaintiff alleges Nakia McCloud, while in the
3 course and scope of her employment with Defendant USA, in its Department of the Treasury, IRS,
4 was also traveling eastbound on Washington Avenue, directly behind Plaintiff.

5 Plaintiff alleges to have stopped in the eastbound travel lane for pedestrians who were
6 crossing Washington Avenue. Plaintiff avers that Nakia McCloud then rear-ended Plaintiff's
7 vehicle.

8 Following the first collision, Nakia McCloud pulled her vehicle off to the right side of the
9 road. Plaintiff's vehicle remained in the roadway. As Nakia McCloud was on the phone with
10 emergency services, while Plaintiff sat in her disabled car, her vehicle was struck again by a
11 different vehicle, driven by Defendant DEMHA SANTIAGO. Plaintiff further contends she was
12 injured as a result of the September 1, 2016 motor vehicle collisions.

13 **B. Relief Sought**

14 Plaintiff seeks past medical specials in an amount in excess of \$1,661,262.05. Plaintiff is
15 continuing her medical treatment. She is also seeking the present-day value of future medical
16 expenses in the amount of \$386,938.00, loss of earning capacity in the amount of \$805,038.85, and
17 past and future pain and suffering.

18 Plaintiff presented claims for future medical specials between \$1,504,780.00 and
19 \$2,238,876.00 during discovery. Thereafter, Defendant USA filed a Motion to Strike Untimely
20 Disclosure of Plaintiff's Expert's Life Care Plan Opinions, which was granted by the Court.

21 **C. Contentions of the Parties**

22 **1. Plaintiff's Contentions:**

23 Plaintiff contends that Defendants were the sole cause of the subject collisions by failing to
24 pay full attention to their surroundings, failing to reduce their speed, and striking the rear of
25 Plaintiff's vehicle. Plaintiff further contends that the motor vehicle collisions caused her significant
26 injuries and the resulting damages that are the subject of this lawsuit.

27 **2. Defendant USA's Contentions:**

28

1 Defendant, USA contends that Plaintiff cannot establish her burden of proof as to causation
2 or damages (if any) as to the USA in the first accident

3 **3. Defendants DEMHA-SANTIAGO and DEMHA’s Contentions:**

4 Defendants LICETH DEMHA-SANTIAGO and JUAN DEMHA (“Defendants”) contend
5 that Defendant USA and Plaintiff are the sole and proximate cause of the subject incident and of
6 Plaintiff’s alleged injuries and damages, i.e., both collisions. Nakia McCloud, while in the course
7 and scope of her employment with Defendant USA (in its Department of the Treasury, IRS), was
8 driving directly behind Plaintiff prior to the initial collision. As a result of McCloud’s failure to pay
9 full attention to traffic in front of her, failure to keep a proper distance, and failure to reduce speed
10 pursuant to the traffic conditions ahead of her, McCloud drove her vehicle into the rear-end of
11 Plaintiff’s vehicle. Following the initial collision, rather than exiting the roadway to her safety,
12 Plaintiff exited her vehicle, inspected it for damage, then re-entered her vehicle which remained
13 disabled in the roadway. While she remained in her vehicle, Plaintiff also failed to fasten her
14 seatbelt. As a result, Plaintiff’s own negligent actions combined Defendant USA’s initial collision,
15 caused the second collision to take place. Defendants contend that Plaintiff’s claimed injuries and
16 damages are the result of Defendant USA and Plaintiff’s negligence. Defendants further contend
17 that but for the collision caused by McCloud, these Defendants never would have been involved in
18 a collision with the Plaintiff.

19 **II.**

20 **Statement of Jurisdiction**

21 As against the United States, this Court has exclusive jurisdiction pursuant to 28 U.S.C.
22 §1346(b)(1), which provides that federal courts “shall have exclusive jurisdiction of civil actions
23 on claims against the United States... for injury or loss of property, or personal injury or death
24 caused by the negligent or wrongful act or omission of any employee of the Government while
25 acting within the scope of his office or employment, under circumstances where the United States,
26 if a private person, would be liable to the claimant in accordance with the law of the place where
27 the act or omission occurred.”
28

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

III.

The following facts are admitted by the parties and require no proof:

1. Nakia McCloud was an employee of the Department of the Treasury, IRS, on September 1, 2016 and she was acting within the course and scope of her employment with the United States at the time of the motor vehicle accident.
2. On September 1, 2016, Plaintiff WILSON was operating a 2005 Toyota Corolla, traveling eastbound on Washington Avenue, approaching Saylor Avenue, in Las Vegas, Nevada.
3. On September 1, 2016,. Nakia McCloud was operating a General Motors Terrain SLE, traveling eastbound on Washington Avenue.
4. On September 1, 2016, Defendant DEMHA-SANTIAGO, was operating a 2006 Acura 3.2 TL, traveling eastbound on Washington Avenue.
5. The vehicle operated by Defendant DEMHA-SANTIAGO was owned by Defendant DEMHA.
6. The front of Nakia McCloud’s vehicle collided with the rear of Plaintiff WILSON’s vehicle.
7. The front of Defendant DEMHA-SANTIAGO’s vehicle collided with the rear of Plaintiff WILSON’s vehicle.
8. The collision between DEMHA-SANTIAGO and Plaintiff did not occur until after McCloud’s vehicle collided with the Plaintiff’s vehicle.

IV.

The following facts, though not admitted, will not be contested at trial by evidence to the contrary:

None.

V.

The following are Plaintiff’s issues of fact to be tried and determined at trial:

1. Whether Nakia McCloud was negligent in her failure to operate her vehicle in a safe

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 and reasonable manner at the time of the incident.
- 2 2. Whether Defendant USA is liable for Plaintiff’s injuries in light of Nakia McCloud’s
- 3 breach of duty.
- 4 3. Whether Defendant DEMHA-SANTIAGO failed to operate her vehicle in a safe and
- 5 reasonable manner at the time of the incident.
- 6 4. Whether Defendant JUAN DEMHA is liable for the subject collision by virtue of
- 7 NRS 41.440.
- 8 5. Whether Defendant JUAN DEMHA negligently entrusted his vehicle to Defendant
- 9 DEMHA-SANTIAGO.
- 10 6. Whether Plaintiff could have reasonably been expected to avoid the second collision
- 11 pursuant to the Court’s Order (ECF 113).
- 12 7. Whether the subject collisions proximately caused injuries to Plaintiff.
- 13 8. Whether the subject collisions proximately caused damages to Plaintiff.
- 14 9. Whether the medical treatment claimed was/is reasonable, necessary, and related to
- 15 the alleged collisions.
- 16 10. Whether the Plaintiff will have future symptoms related to the alleged collisions.
- 17 11. Whether the Plaintiff will incur future treatments related to the alleged collisions.
- 18 12. Whether the Plaintiff suffered a loss of earning capacity related to the alleged
- 19 collisions.
- 20 13. Whether the Plaintiff has mitigated her damages that she relates to the alleged
- 21 collisions.
- 22 14. The monetary value of Plaintiff’s damages, including pain and suffering, if any.

The following are Defendant USA’s issues of fact to be tried and determined at trial.

- 24 1. Whether Plaintiff should have stopped at the intersection given that the
- 25 pedestrians never entered the intersection and, even if they did, the pedestrians
- 26 were not in immediate harm or danger given that they were on the other side of the
- 27 street and nowhere near Plaintiff’s vehicle.
- 28

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 2. Whether Plaintiff's exit and later re-entry of her own vehicle caused her to sustain
- 2 injuries due to the second accident.
- 3 3. Whether the United States is liable to Plaintiff and if so, to what extent.
- 4 4. Whether the United States' employee's actions caused Plaintiff's injuries (if any).
- 5 5. Whether and the extent to which Plaintiff was injured as a result of the first
- 6 accident involving the United States' employee.
- 7 6. Whether Plaintiff or any other party's negligence contributed to the accidents
- 8 and/or Plaintiff's injuries.

9 **The following are Defendants DEMHA-SANTIAGO, and DEMHA's issues of fact to be tried**
10 **and determined at trial.**

- 11 1. Whether Nakia McCloud was negligent in her failure to operate her vehicle in a safe and
- 12 reasonable manner at the time of the incident.
- 13 2. Whether Defendant USA is liable for Plaintiff's injuries in light of Nakia McCloud's breach
- 14 of duty.
- 15 3. Whether Plaintiff failed to operate her vehicle in a safe and reasonable manner at the time
- 16 of the subject incident, at times preceding both collisions.
- 17 4. Whether Plaintiff contributed to the initial collisions occurrence, i.e. Plaintiff's degree of
- 18 fault for the collision between herself and McCloud.
- 19 5. Whether, after the first collision, Plaintiff contributed to the second collision's occurrence,
- 20 i.e. Plaintiff's degree of fault for the second collision between herself and Demha.
- 21 6. Whether the collision between Plaintiff and DEMHA-SANTIAGO would have occurred
- 22 but for the collision between Plaintiff and McCloud.
- 23 7. Whether Defendant JUAN DEMHA is liable for the subject collision by virtue of NRS
- 24 41.440.
- 25 8. Whether Defendant JUAN DEMHA negligently entrusted his vehicle to Defendant
- 26 DEMHA-SANTIAGO.
- 27 9. Whether Plaintiff could have reasonably been expected to avoid the second collision
- 28

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 pursuant to the Court’s Order (ECF 113).
- 2 10. Whether Plaintiff assumed the risk of reentering her vehicle following the initial collision
- 3 11. Whether the subject collisions proximately caused injuries to Plaintiff.
- 4 12. Whether the subject collisions proximately caused damages to Plaintiff.
- 5 13. Whether Plaintiff had preexisting conditions related to the body parts complained of
- 6 resulting from the subject accident, and any apportionment thereof.
- 7 14. Whether the medical treatment claimed was/is reasonable, necessary, and related to the
- 8 alleged collisions.
- 9 15. Whether the Plaintiff will have future symptoms related to the alleged collisions.
- 10 16. Whether the Plaintiff will incur future treatments related to the alleged collisions.
- 11 17. Whether the Plaintiff suffered a loss of earning capacity related to the alleged collisions.
- 12 18. Whether the Plaintiff has mitigated her damages that she relates to the alleged collisions.
- 13 19. The monetary value of Plaintiff’s damages, including pain and suffering, if any.

VI.

(a) The following exhibits are stipulated into evidence in this case and may be so marked by the clerk:

See “**Exhibit A-1**” of this document..

(b) The parties agree the following exhibits will be available for use at the time of trial but are not currently admitted:

See “**Exhibit A**” of this document

(c) As to the following additional exhibits the parties propose the following:

(1) Plaintiff’s exhibits:

See “**Exhibit B**” of this document.

Plaintiff reserves the right to use any documents disclosed by Defendants, including those which experts have reviewed and formed opinions, such as reports; pleadings; correspondence; notes and medical records and billing.

Plaintiff may use any and all writings, published works, journals, treatises, medical texts,

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1 affidavits, films, drawings, graphs, charts, photographs, reports, computer tapes, computer discs,
2 and other data compilations, and other medical reference materials which Plaintiff and/or Plaintiff's
3 expert(s) use in support of Plaintiff's allegations. By disclosing documents, Plaintiff does not waive
4 the right to challenge and exclude documents, or portions thereof, on any basis.

5 Plaintiff may offer documents needed for rebuttal or impeachment purposes, including, but
6 not limited to, discovery obtained during the course of litigation as permitted; pleadings; and other
7 documentation in accordance with admissible evidence. There may be additional exhibits which
8 Plaintiff may wish to offer at the time of trial, not listed above. When and if that determination is
9 made, notice will be given immediately and supplied to the Court and to Defendants.

10 **(1) Defendant USA's exhibits:**

11 See "Exhibit C" of this document.

12 Defendant reserves the right to use any document including but not limited to discovery
13 responses and/or deposition testimony by Plaintiff or co-defendants for impeachment and/or
14 substantively as party admissions, as may be relevant at trial. Defendant reserves the right to use
15 demonstrative evidence. Defendant also reserves the right to use any exhibit listed or introduced by
16 Plaintiff or co-defendants, or as previously produced by the parties.

17 **(1) Defendant DEMHA-SANTIAGO, and DEMHA's exhibits:**

18 See "Exhibit D" of this document.

19 Defendants reserve the right to use any discovery responses and/or deposition testimony by
20 any party for impeachment and/or substantively as party admissions, as may be relevant at trial.
21 Defendants reserve the right to use demonstrative evidence. Defendants also reserve the right to use
22 any exhibit listed or introduced by any party.

23 As to the medical records listed separately in the parties' list of exhibits, the parties were
24 unable to meet in person to review the same in light of the volume of records, Plaintiff's continued
25 treatment, and the time permitted to submit the Proposed Joint Pre-Trial Order. However, the parties
26 will endeavor to do so prior to trial and identify which portions of said records may be stipulated to
27 and which may not.

28

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(c) Electronic evidence:

1. The parties may offer Power Point images/drawings/diagrams/animations/story boards depicting the facts and circumstance of the accident, information relevant to communications between the parties, and/or deposition testimony.

2. The parties do intend to present electronic evidence for purposes of jury deliberations.

(d) Depositions:

1. Plaintiff will offer the following deposition testimony at trial:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, 21:1-19, 22:18-23:4, 27:22-28:8, 28:24-31:16, 35:20-49:24, 52:16-53:15, 57:14-62:4
Nakia McCloud	12:21-13:14, 27:4-28:16, 32:8-34:11, 34:25-35:23, 39:8-47:20, 48:22-54:22, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 83:17-85:6, 92:13-93:19, 96:9-96:14
Sonalolita Wilson	13:2-13:22, 15:3-15:10, 15:15-16:15, 17:4-17:12, 19:8-19:14, 19:20-22:23, 23:9-26:10, 27:7-29:18, 34:14-35:9, 35:25-38:10, 38:24-40:25, 42:5-54:1, 54:9-60:2, 65:5-66:18,67:17-69:17, 71:6-75:23, 80:15-82:16, 86:8-88:3, 88:17-89:15, 89:25-90:13, 93:8-96:10, 97:10-101:20, 102:14-103:1, 105:18-106:18, 107:11-109:10, 109:25-111:12, 111:19-112:6, 112:19-119:4, 123:12-125:5, 125:20-135:15, 136:5-138:13
Baduk Ghuman	18:14 – 20:6, 21:9 – 22:22, 27:16 – 28:25, 30:8 – 33:11, 35:1-41:9, 44:9– 49:5, 49:6-50:8, 50:14-55:3, 55:5-56:1, 56:25-58:7, 59:2-60:23, 60:24-64:15, 64:16-67:9, 68:6-71:9, 75:11-76:25, 82:7-84:5, 84:11-88:18, 89:3-91:16, 94:19-96:12, 100:6-103:25, 108:7-110:22, 111:16-112:25, 113:21-115:25
Duff Kaster	15:3-15:22, 21:12-23:11, 24:9-25:1, 25:16-26:13, 26:24-27:12, 28:4-29:24, 32:21-33:23, 34:6-34:16, 35:1-35:18
Robert Hinton	10:4 – 11:15, 12:17 – 13:1, 14:7-15:4, 15:9-16:16, 16:20-17:12, 21:10-23:19, 24:12-25:12, 26:1-30:14, 31:1-32:2, 33:9-40:23
Mark Glyman	11:25-12:21, 14:10-15:1, 19:1-22:4, 22:18-23:16, 24:4-31:16, 33:3-33:20, 34:13-37:13,37:20-41:16, 41:22-43:9, 44:1-44:23
Thomas Dunn	7:12-9:12, 19:13-20:16, 23:5-24:2, 25:4-25:22, 26:18-31:19, 33:20-35:10, 35:17-39:10, 39:21-44:20, 48:25-50:11, 52:20-55:5, 56:7-57:7, 57:20-60:2, 60:23-61:6, 61:21-62:20, 63:19-66:3, 66:14-67:19
Rick Chavez	10:16-11:6, 20:6-20:18, 22:21-24:22, 25:3-25:14, 29:16-31:21, 41:3-42:19,45:9-46:1, 47:23-50:5, 51:1-53:9, 59:13-60:21, 63:14-63:25, 64:24-70:10, 71:10-72:24, 73:9-74:14, 75:25-76:17, 77:17-78:12, 79:1-81:14, 82:8-83:2,84:13-86:9, 87:6-87:24, 94:19-96:9, 102:21-103:19, 106:7-107:10,108:17-109:18, 110:1-112:2, 114:9-118:17
Kim Balogh	12:24-14:4, 18:3-19:2, 19:11-20:24, 22:4-25:20, 26:22-29:15, 30:9-33:5, 33:14-33:23

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1 2 3	David John Oliveri	11:24-14:2, 14:14-15:15, 16:25-17:16, 20:1-20:16, 24:4-24:25, 26:2-26:24, 28:3-28:10, 30:3-30:17, 31:14-32:4, 32:17-36:1, 36:7-37:14, 37:22-42:1, 42:15-43:15, 44:2-45:7, 49:7-50:7, 51:8-51:16, 52:19-53:5, 53:18-54:14, 55:19-57:12, 57:21-58:20, 61:3-62:3, 64:14-64:22, 65:11-66:21, 71:8-73:5, 77:6-77:13, 77:19-78:5
4	Robert Simmons	13:3-13:15, 14:24-15:4, 19:21-20:14, 23:3-25:10, 28:3-29:11, 30:6-31:9, 34:25-37:8, 38:24-39:22, 41:10-42:14
5 6 7 8	Jaswinder Grover	11:23-13:13, 17:6-17:22, 20:5-21:8, 21:21-22:13, 23:1-24:11, 25:2-27:18, 29:18-31:3, 32:3-33:1, 35:18-38:21, 39:2-41:20, 43:2-43:6, 44:16-48:25, 49:1-49:25, 50:8-52:5, 53:3-55:14, 59:5-61:4, 62:10-64:7, 66:2-68:17, 70:4-74:6, 74:23-76:9, 77:7-78:15, 80:3-81:25, 84:11-85:3, 89:4-93:12, 94:6-94:13, 94:14-96:18, 96:21-97:14, 98:3-102:14, 104:7-105:16, 106:6-111:21
9 10	Sonalolita Wilson pt. II	157:1-164:11, 170:8-180:1, 182:14-183:8, 184:2-185:5, 185:6-186:17, 187:18-191:4, 191:15-192:8, 196:23-198:7, 201:8-202:7, 205:1-207:17, 209:24-217:17, 218:22-220:11, 222:1-223:20, 225:3-227:8, 233:14-236:15, 237:14-239:14, 241:7-245:4, 248:3-249:4

11 Plaintiff anticipates reading depositions into the records and reserve the right to use all
 12 depositions which have been conducted in this action due to witness unavailability, if allowed under
 13 FRCP 32(a)(4)(B), to refresh recollection and/or to impeach a witness, as well as any other
 14 permitted use under the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

15 2. Defendant USA does not intend, at this time to offer page and line designations for
 16 any deposition transcripts. In the event Defendant USA learns that a witness is unavailable to testify
 17 at trial, Defendant USA will notify all parties and the Court of page and line designations of the
 18 unavailable witness’s deposition transcript to offer at trial. Defendant USA reserves the right to use
 19 all depositions which have been conducted in this action to refresh recollection and/or to impeach
 20 a witness, and otherwise use at trial in accordance with the applicable rules, *i.e.*, Fed. R. Civ. P. 32;
 21 Fed. R. Evid. 801(d).

22 3. Defendants DEMHA-SANTIAGO, and DEMHA will offer the following
 23 depositions:

Deponent	Offered Testimony
24 25	Liceth Demha 10:5-11:20, 15:7-8, 17:7-21, 20:9-13, 20:20-25, 23:15-16, 24:11-16, 27:22-28:8, 28:24-31:7, 35:20-36:12, 40:14-16, 47:14-19, 52:16-53:15, 54:20-25, 57:14-23, 58:14-20, 59:23-60:5, 61:16-20
26 27	Nakia McCloud 12:21-13:14, 24:14-25:1, 27:4-28:16, 30:20-31:5, 32:8-34:11, 34:25-35:23, 36:5-7, 39:8-47:20, 48:22-54:22, 55:4-56:13, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 80:5-18, 81:10-25, 83:17-85:6, 87:9-

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1		24, 89:15-25, 93:4-17, 96:9-96:14
2	Sonalolita Wilson	8:2-14, 11:8-22, 13:2-13:14, 15:3-16:15, 18:5-19:7, 19:20-21:11, 21:18-22:13, 24:1-12, 27:7-29:18, 35:25-38:10, 38:24-54:1, 59:14-24, 3
4		60:10-61:5, 65:5-66:20, 66:19-25, 67:10-12, 89:21-90:9, 90:20-91:8, 97:2-109:10, 112:24-113:4, 113:5-113:13, 119:8-119:13, 128:15-17, 131:3-14, 136:14-137:2, 137:17-25,
5	Babuk Ghuman	9:8-17, 9:18-11:7, 11:13-24, 15:14-25, 16:1-7, 17:19-18:2, 21:9-22:24, 24:13-23, 27:16 – 28:25, 30:8 – 33:11, 34:3-19, 35:1-41:9, 47:2-24, 6
7		48:7-18, 49:6-50:8, 50:14-55:3, 60:1-23, 62:2-25, 63:8-14, 67:6-9, 68:19-69:2, 80:5-12, 87:15-19, 91:14-23, 94:5-11, 100:9-18, 112:11-25, 113:8-13
8	Duff Kaster	6:8-7:10, 7:11-22, 10:23-11:25, 15:23-16:10, 18:12-19:1, 21:12-15, 24:9-18, 28:4-7, 32:1-7
9	Robert Hinton	7:2-13, 9:6-16, 10:4 – 11:23, 12:17 – 13:1, 13:14-17:12, 18:21-19:22, 21:10-24, 23:1-9, 26:1-7, 28:17-29:21, 31:1-9,
10	Mark Glyman	6:3-7:25, 8:13-15, 10:1-11:24, 13:7-10, 14:10-19, 16:11-17:9, 19:4- 20:25, 21:8-22:4, 24:4-9, 30:1-31:16, 37:20-25
11	Thomas Dunn	6:12-7:23, 9:14-22, 10:8-23, 12:2-7, 18:3-19:5, 19:13-20:16, 23:5-24:2, 37:10-17, 42:8-43:24, 45:17-47:5, 50:3-11, 12
13		60:3-21, 60:23-61:6,
14	Rick Chavez	5:7-16, 21:1-3, 26:4-6, 28:3-10, 40:15-41:5, 44:3-45:8, 56:3-6, 59:6-7, 61:10-62:6, 62:18-63:1, 64:5-20, 65:8-15, 67:4-68:25, 15
16		69:1-5, 71:10-21, 72:2-14, 73:17-23, 74:15-22, 77:5-12, 84:13-21, 85:1-17, 86:1-9, 88:16-17, 90:5-9, 96:4, 105:4-5, 111:3-19, 114:16- 115:22, 119:22-120:1, 120:20-121:2
17	Kim Balogh	7:19-18:2, 12:4-13:8, 18:22-19:2, 24:9-25:9, 25:21-26:21, 28:7-13, 28:22-29:2, 30:24-31:19, 32:14-33:23
18	David John Olivieri	7:25-9:25, 10:14-21, 11:12-24, 12:1-13:12, 14:9-15:6, 15:7-18, 15:23 16:3, 16:4-24, 17:17-21, 18:4-19:3, 20:1-21, 21:2-22:16, 23:18-24:25, 19
20		25:4-26:24, 27:3-28:10, 29:24-30:14, 31:3-32:14, 32:22-33:20, 34:4- 36:1, 36:7-37:14, 39:1-21, 39:23-42:1, 42:15-43:2, 44:1-5, 44:7-45:7, 45:19-46:5, 47:3-23, 51:1-16, 55:19-56:8, 57:21-58:4, 58:10-20, 58:21 59:22, 60:1-9, 60:14-61:22, 64:4-22, 65:25-66:16, 66:17-67:2, 67:3 68:13, 68:14-22, 68:23-69:1, 69:18-70:13, 71:11-14, 77:22-79:23
21	Robert Simmons	7:15-19, 8:6-8, 11:7-13, 13:10-15, 14:9-13, 14:25-15:2, 16:6-17:1, 17:9-16, 18:12-19:11, 20:4-20:22, 21:3-6, 24:1-25:2, 26:10 22
23		27:8, 28:3-23, 29:20-30:18, 31:5-25, 32:4-17, 34:25-36:7, 36:8-25, 37:1-8, 38:24-39:17, 41:10-25
24	Jaswinder Grover	8:19-21, 12:15-13:13, 20:5-8, 21:18-20, 23:1-24:11, 26:22-27:18, 29:18-30:13, 33:2-3, 35:18-11, 36:22-37:1, 38:7-21, 39:2- 41:20, 44:3-5, 45:10-19, 46:13-47:24, 48:12-25, 50:8-19, 56:2-7, 25
26		56:16-22, 58:7-25, 63:13-23, 64:17-66:1, 67:3-68:6, 69:1-24, 71:11- 72:23, 74:20-76:9, 80:8-19, 84:2-16, 88:2-19, 89:2-17, 90:16-91:22, 94:14-95:18, 96:2-18, 97:2-22, 98:3-99:8, 99:9-100:18, 102:16-103:20, 103:21-104:3, 104:10-105:9, 105:10-12, 106:4-107:9, 107:11-108:1, 108:2-9,
27	Sonalolita Wilson pt.	148:16-25, 150:22-151:16, 152:1-7, 155:6-25, 157:1-164:11, 164:21-
28		

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

II	170:13, 172:22-25, 174:1-8, 174:17-23, 175:13-25, 176:16-177:7, 177:11-21, 180:19-22, 182:14-183:8, 185:6-186:12, 189:7-190:19, 192:2-8, 192:25-193:6, 201:9-15, 205:1-22, 213:7-14, 213:18-22, 214:9-14, 217:5-25, 225:3-12, 238:19-239:11, 243:5-244:6, 248:11-24
Frank Perez	Plaintiff is in the process of obtaining his deposition transcript and will supplement at a later date.

Defendants anticipate reading depositions into the records and reserve the right to use all depositions which have been conducted in this action due to witness unavailability, if allowed under FRCP 32(a)(4)(B), to refresh recollection and/or to impeach a witness, as well as any other permitted use under the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

(f) Objections to Depositions:

(1) Plaintiff objects to Defendant USA’s depositions as follows:

Plaintiff reserves the right to object to any particular portions of the deposition transcript(s), including, without limitation, if and/or when Defendant USA provides them.

(2) Plaintiff objects to Defendant DEMHA-SANTIAGO, and DEMHA’s depositions as follows:

Deponent	Offered Testimony	Plaintiff’s Objections
Liceth Demha	10:5-11:20, 15:7-8, 17:7-21, 20:9-13, 20:20-25, 23:15-16, 24:11-16, 27:22-28:8, 28:24-31:7, 35:20-36:12, 40:14-16, 47:14-19, 52:16-53:15, 54:20-25, 57:14-23, 58:14-20, 59:23-60:5, 61:16-20	17:7 – 21 – Relevance 20:20 – 25 – Relevance 54:20 – 25 – Relevance
Nakia McCloud	12:21-13:14, 24:14-25:1, 27:4-28:16, 30:20-31:5, 32:8-34:11, 34:25-35:23, 36:5-7, 39:8-47:20, 48:22-54:22, 55:4-56:13, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 80:5-18, 81:10-25, 83:17-85:6, 87:9-24, 89:15-25, 93:4-17, 96:9-96:14	24:14 – 18 – Relevance 30:20 – 31:5 – Speculation 34:25 – 35:23 – Relevance
Sonalolita Wilson	8:2-14, 11:8-22, 13:2-13:14, 15:3-16:15, 18:5-19:7, 19:20-21:11, 21:18-22:13, 24:1-12, 27:7-29:18, 35:25-38:10, 38:24-54:1, 59:14-24, 60:10-61:5, 65:5-66:20, 66:19-25, 67:10-12, 89:21-90:9, 90:20-91:8, 97:2-109:10, 112:24-113:4, 113:5-113:13, 119:8-119:13, 128:15-17, 131:3-14, 136:14-137:2, 137:17-25,	27:7 – 28:23 – Relevance; more prejudicial than probative 60:10 – 61:5 – Relevance; attorney client privilege; more prejudicial than probative
Babuk Ghuman	9:8-17, 9:18-11:7, 11:13-24, 15:14-25, 16:1-7, 17:19-18:2, 21:9-22:24, 24:13-	11:13 – 24 – Relevance

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	23, 27:16 – 28:25, 30:8 – 33:11, 34:3-19, 35:1-41:9, 47:2-24, 48:7-18, 49:6-50:8, 50:14-55:3, 60:1-23, 62:2-25, 63:8-14, 67:6-9, 68:19-69:2, 80:5-12, 87:15-19, 91:14-23, 94:5-11, 100:9-18, 112:11-25, 113:8-13	47:2 – 24 – Misrepresents facts in evidence; speculation 48:7 – 18 – Relevance; more prejudicial than probative 62:2 – 63:14 – Speculation; Relevance; Assumes facts not in evidence 112:11 – 25 – Misrepresents facts in evidence; speculation Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff’s injuries.
Duff Kaster	6:8-7:10, 7:11-22, 10:23-11:25, 15:23-16:10, 18:12-19:1, 21:12-15, 24:9-18, 28:4-7, 32:1-7	32:1 – 7 – Misrepresents the witness’ testimony; vague Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff’s injuries.
Robert Hinton	7:2-13, 9:6-16, 10:4 – 11:23, 12:17 – 13:1, 13:14-17:12, 18:21-19:22, 21:10-24, 23:1-9, 26:1-7, 28:17-29:21, 31:1-9,	
Mark Glyman	6:3-7:25, 8:13-15, 10:1-11:24, 13:7-10, 14:10-19, 16:11-17:9, 19:4-20:25, 21:8-22:4, 24:4-9, 30:1-31:16, 37:20-25	13:7 – 10 – Relevance 14:10 – 19 – Relevance Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff’s injuries.
Thomas Dunn	6:12-7:23, 9:14-22, 10:8-23, 12:2-7, 18:3-19:5, 19:13-20:16, 23:5-24:2, 37:10-17, 42:8-43:24, 45:17-47:5, 50:3-11, 60:3-21, 60:23-61:6,	18:3 – 19:5 – Relevance 42:8 – 43:24 – Speculation; improper hypothetical 60:3 – 21 – Relevance Plaintiff objects to any hypothetical questions not based

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

		in evidence as to the causation of Plaintiff's injuries.
Rick Chavez	5:7-16, 21:1-3, 26:4-6, 28:3-10, 40:15-41:5, 44:3-45:8, 56:3-6, 59:6-7, 61:10-62:6, 62:18-63:1, 64:5-20, 65:8-15, 67:4-68:25, 69:1-5, 71:10-21, 72:2-14, 73:17-23, 74:15-22, 77:5-12, 84:13-21, 85:1-17, 86:1-9, 88:16-17, 90:5-9, 96:4, 105:4-5, 111:3-19, 114:16-115:22, 119:22-120:1, 120:20-121:2	
Kim Balogh	7:19-18:2, 12:4-13:8, 18:22-19:2, 24:9-25:9, 25:21-26:21, 28:7-13, 28:22-29:2, 30:24-31:19, 32:14-33:23	
David John Oliveri	7:25-9:25, 10:14-21, 11:12-24, 12:1-13:12, 14:9-15:6, 15:7-18, 15:23 16:3, 16:4-24, 17:17-21, 18:4-19:3, 20:1-21, 21:2-22:16, 23:18-24:25, 25:4-26:24, 27:3-28:10, 29:24-30:14, 31:3-32:14, 32:22-33:20, 34:4-36:1, 36:7-37:14, 39:1-21, 39:23-42:1, 42:15-43:2, 44:1-5, 44:7-45:7, 45:19-46:5, 47:3-23, 51:1-16, 55:19-56:8, 57:21-58:4, 58:10-20, 58:21 59:22, 60:1-9, 60:14-61:22, 64:4-22, 65:25-66:16, 66:17-67:2, 67:3 68:13, 68:14-22, 68:23-69:1, 69:18-70:13, 71:11-14, 77:22-79:23	10:14 – 21 – Relevance 18:4 – 19:3 – Relevance 27:3 – 28:10 – Speculation 42:15 – 43:2 – Speculation 67:3 – 68:13 – Relevance; violation of the collateral source rule 77:22 – 79:23 – Speculation Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff's injuries.
Robert Simmons	7:15-19, 8:6-8, 11:7-13, 13:10-15, 14:9-13, 14:25-15:2, 16:6-17:1, 17:9-16, 18:12-19:11, 20:4-20:22, 21:3-6, 24:1-25:2, 26:10 27:8, 28:3-23, 29:20-30:18, 31:5-25, 32:4-17, 34:25-36:7, 36:8-25, 37:1-8, 38:24-39:17, 41:10-25	24:1 – 25:2 – Speculation 29:20 – 32:17 – Speculation; misstates facts in evidence; improper hypothetical 36:8 – 25 – Speculation 41:10 – 25 – Relevance
Jaswinder Grover	8:19-21, 12:15-13:13, 20:5-8, 21:18-20, 23:1-24:11, 26:22-27:18, 29:18-30:13, 33:2-3, 35:18-11, 36:22-37:1, 38:7-21, 39:2-41:20, 44:3-5, 45:10-19, 46:13-47:24, 48:12-25, 50:8-19, 56:2-7, 56:16-22, 58:7-25,	63:13-23 and 64:17 – 66:1 – Relevance; speculation

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	63:13-23, 64:17-66:1, 67:3-68:6, 69:1-24, 71:11-72:23, 74:20-76:9, 80:8-19, 84:2-16, 88:2-19, 89:2-17, 90:16-91:22, 94:14-95:18, 96:2-18, 97:2-22, 98:3-99:8, 99:9-100:18, 102:16-103:20, 103:21-104:3, 104:10-105:9, 105:10-12, 106:4-107:9, 107:11-108:1, 108:2-9,	
Sonalolita Wilson pt. II	148:16-25, 150:22-151:16, 152:1-7, 155:6-25, 157:1-164:11, 164:21-170:13, 172:22-25, 174:1-8, 174:17-23, 175:13-25, 176:16-177:7, 177:11-21, 180:19-22, 182:14-183:8, 185:6-186:12, 189:7-190:19, 192:2-8, 192:25-193:6, 201:9-15, 205:1-22, 213:7-14, 213:18-22, 214:9-14, 217:5-25, 225:3-12, 238:19-239:11, 243:5-244:6, 248:11-24	157:1 – 164:11 – Relevance 164:21 – 170:13 – Relevance 185:6 – 186:12 – Relevance 189:7 – 190:19 – Relevance 192:25 – 193:6 – Relevance; hearsay 201:21 – 24 -- Relevance 205:1 – 22 – Relevance

(3) Defendant USA objects to plaintiff’s depositions as follows:

a. Plaintiff WILSON’s depositions: All testimony.

b. David John Oliveri’s deposition: All testimony; including, without limitation, to any testimony related to David John Oliveri’s life care plan and future medical treatments as struck by the Court. *See* ECF No. 90.

c. To the extent Plaintiff intends to call Defendant USA’s expert witnesses and present their deposition testimony in her case-in-chief, Defendant USA objects to: All Plaintiff’s proposed testimony of Defendant USA’s expert witnesses; including, without limitation, to Rick Chavez and Kimberly Balough’s testimony.

Defendant, USA reserves the right to object to any particular portions of the other deposition transcripts, including, without limitation, those provided by Plaintiff and Defendants DEHMA-SANTIAGO and DEMHA’s inclusions in this order. Furthermore, USA joins as to co-defendant DEMHA-SANTIAGO’s objections to Plaintiff’s depositions as noted in subsection (4) below. USA further objects to the extent that either Plaintiff or co-defendants seek to introduce or use any deposition transcript at trial beyond that allowed under Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

1 (4) The United States objects to Defendants DEMHA-SANTIAGO and DEMHA's deposition page,
2 line designations as follows:

3 Deponent	Offered Testimony
4 Liceth Demha	10:5-11:20 (relevance; prejudicial; calls for speculation; incomplete 5 hypothetical; expert opinion) 20:20-25 (relevance; prejudicial; character evidence)
6 Nakia McCloud	12:21-13:14 (relevance; prejudicial; calls for speculation; 7 incomplete hypothetical; expert opinion) 27:4-28:16 (relevance) 8 30:20-31:5 (relevance) 34:25-35:23 (relevance; prejudicial; character evidence) 9 36:5-7 (relevance, confusion of issues) 39:8-47:20 (relevance; legal conclusion) 10 55:4-56:13 (relevance; prejudice; hearsay; best evidence rule) 57:15-62:22 (relevance; prejudice; hearsay; best evidence rule) 11 76:24-78:15 (relevance; hearsay; best evidence rule) 80:5-18 (relevance; prejudice; legal conclusion; best evidence rule) 12 81:10-25 (relevance; prejudice; legal conclusion; calls for speculation) 13 83:17-85:6 (relevance; prejudice; hypothetical to lay witness; legal conclusion; calls for speculation) 14 89:15-25 (relevance; prejudice; testimony by counsel)
15 Sonalolita Wilson	24:1-12 (legal conclusion, expert opinion) 119:8-119:13 (hearsay)
16 Babuk Ghuman	9:18-11:7 (relevance) 15:14-25 (relevance) 17 62:2-25 (relevance; best evidence rule) 67:6-9 (relevance; best evidence rule) 18 87:15-19 (relevance) 113:8-13 (relevance)
19 Duff Kaster	6:8-7:10 (relevance) 20 10:23-11:25 (relevance)
21 Robert Hinton	13:14-17:12 (object to 16:9-16 on grounds of relevance, prejudice, self-serving hearsay, legal conclusion)
22 Mark Glyman	6:3-7:25 (relevance) 10:1-11:24 (relevance; best evidence rule); 23 13:7-10 (relevance; prejudicial) 24 24:4-9 (relevance; foundation)
25 Thomas Dunn	60:3-21 (relevance; hearsay; counsel testifying)
26 Rick Chavez	5:7-16 (relevance; foundation; best evidence rule) 28 28:3-10 (relevance) 40:15-41:5 (relevance) 44:3-45:8 (relevance; best evidence rule) 56:3-6 (relevance)

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	59:6-7 (incomplete hypothetical; relevance) 64:5-20 (testimony by counsel)
Kim Balogh	30:24-31:19 (relevance; incomplete hypothetical; foundation) 32:14-33:23 (incomplete/improper hypothetical; foundation)
David John Olivieri	11:12-24 (relevance) 15:23 16:3 (relevance; foundation; 702) 34:4-36:1 (relevance; speculation) 69:18-70:13 (relevance; foundation; 702) 77:22-79:23 (relevance; foundation; 702)
Robert Simmons	7:15-19 (relevance) 11:7-13 (relevance) 17:9-16 (relevance) 24:1-25:2 (hearsay)
Jaswinder Grover	21:18-20 (relevance) 44:3-5 (relevance; foundation)
Sonalolita Wilson pt. II	243:5-244:6 (hearsay; legal conclusion)

(5) Defendant DEMHA-SANTIAGO, and DEMHA object to plaintiff's depositions as follows:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, (calls for speculation; incomplete hypothetical; expert opinion) 21:1-19, (relevance; prejudicial) 22:18-23:4, (relevance) 27:22-28:8, (relevance) 28:24-31:16, (relevance; assumption) 35:20-49:24, (relevance; expert opinion) 57:14-62:4 (relevance; expert opinion)
Nakia McCloud	39:8-47:20, (expert opinion) 83:17-85:6, (incomplete hypothetical; calls for speculation; expert opinion) 92:13-93:19, (calls for legal conclusion; expert opinion)
Sonalolita Wilson	13:2-13:22, (relevance, prejudicial, expert opinion) 19:8-19:14, (relevance) 23:9-26:10, (expert opinion) 38:24-40:25, (expert opinion) 42:5-54:1, (relevance, expert opinion) 54:9-60:2, (relevance, expert opinion, best evidence rule) 71:6-75:23, (expert opinion, best evidence rule) 80:15-82:16, (relevance, prejudicial) 86:8-88:3, (relevance, expert opinion, prejudicial, best evidence rule) 88:17-89:15, (relevance, expert opinion, prejudicial, best evidence rule) 89:25-90:13, (relevance, expert opinion, prejudicial, best evidence rule) 93:8-96:10, (relevance, expert opinion, prejudicial, best evidence rule) 102:14-103:1, (relevance, prejudicial, best evidence rule) 105:18-106:18, (relevance, prejudicial) 107:11-109:10, (relevance, prejudicial) 109:25-111:12, (relevance, prejudicial, best evidence rule)

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1		112:19-119:4, (relevance, prejudicial, best evidence rule)
2		125:20-135:15, (relevance, prejudicial, best evidence rule)
3		136:5-138:13 (relevance, prejudicial, best evidence rule)
4	Baduk Ghuman	18:14 – 20:6, (relevance, prejudicial)
5		21:9 – 22:22, (relevance, prejudicial)
6		27:16 – 28:25, (relevance, prejudicial, best evidence rule)
7		35:1-41:9, (relevance, prejudicial, best evidence rule)
8		44:9– 49:5, (relevance, prejudicial, best evidence rule)
9		50:14-55:3, (relevance, prejudicial, best evidence rule)
10		55:5-56:1, (relevance, prejudicial, best evidence rule)
11		56:25-58:7, (relevance, prejudicial, best evidence rule)
12		59:2-60:23, (relevance, prejudicial, best evidence rule)
13		60:24-64:15, (relevance, prejudicial, best evidence rule)
14		64:16-67:9, (relevance, prejudicial, best evidence rule)
15		68:6-71:9, (relevance, prejudicial, best evidence rule)
16		75:11-76:25, (relevance, prejudicial, best evidence rule)
17		82:7-84:5, (relevance, prejudicial, best evidence rule)
18		84:11-88:18, (relevance, prejudicial, best evidence rule)
19		89:3-91:16, (relevance, prejudicial, best evidence rule)
20		94:19-96:12, (relevance, prejudicial, best evidence rule)
21		100:6-103:25, (relevance, prejudicial, best evidence rule)
22		108:7-110:22, (relevance, prejudicial, best evidence rule)
23		111:16-112:25, (relevance, prejudicial, best evidence rule)
24		113:21-115:25 (relevance, prejudicial, best evidence rule)
25	Duff Kaster	15:3-15:22, (relevance, prejudicial, best evidence rule)
26		21:12-23:11, (relevance, prejudicial, best evidence rule)
27		24:9-25:1, (relevance, prejudicial, best evidence rule)
28		25:16-26:13, (relevance, prejudicial, best evidence rule)
		26:24-27:12, (relevance, prejudicial, best evidence rule)
		28:4-29:24, (relevance, prejudicial, best evidence rule)
		32:21-33:23, (relevance, prejudicial, best evidence rule)
		34:6-34:16, (relevance, prejudicial, best evidence rule)
		35:1-35:18(relevance, prejudicial, best evidence rule)
	Robert Hinton	21:10-23:19, (relevance, prejudicial, best evidence rule)
		24:12-25:12, (relevance, prejudicial, expert opinion, best evidence rule)
		26:1-30:14, (relevance, prejudicial, expert opinion, best evidence rule)
		31:1-32:2, (relevance, prejudicial, expert opinion, best evidence rule)
		33:9-40:23(relevance, prejudicial, expert opinion, best evidence rule)
	Mark Glyman	11:25-12:21, (relevance, prejudicial, best evidence rule)
		14:10-15:1, (relevance, prejudicial, best evidence rule)
		19:1-22:4, (relevance, prejudicial, best evidence rule)
		22:18-23:16, (relevance, prejudicial, best evidence rule)
		24:4-31:16, (relevance, prejudicial, best evidence rule)
		33:3-33:20, (relevance, prejudicial, best evidence rule)
		34:13-37:13, (relevance, prejudicial, best evidence rule)
		37:20-41:16, (relevance, prejudicial, best evidence rule)
		41:22-43:9, (relevance, prejudicial, expert opinion, best evidence rule)

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1		44:1-44:23(relevance, prejudicial, expert opinion, best evidence rule)
2	Thomas Dunn	25:4-25:22, (relevance, prejudicial, best evidence rule)
3		26:18-31:19, (relevance, prejudicial, best evidence rule)
4		33:20-35:10, (relevance, prejudicial, best evidence rule)
5		35:17-39:10, (relevance, prejudicial, best evidence rule)
6		39:21-44:20, (relevance, prejudicial, best evidence rule)
7		48:25-50:11, (relevance, prejudicial, best evidence rule)
8		52:20-55:5, (relevance, prejudicial, best evidence rule)
9		56:7-57:7, (relevance, prejudicial, best evidence rule)
10		57:20-60:2, (relevance, prejudicial, best evidence rule)
11		60:23-61:6, (relevance, prejudicial, best evidence rule)
12		61:21-62:20, (relevance, prejudicial, best evidence rule)
13		63:19-66:3, (relevance, prejudicial, best evidence rule)
14		66:14-67:19(relevance, prejudicial, best evidence rule)
15	Rick Chavez	10:16-11:6, (relevance, prejudicial, best evidence rule)
16		20:6-20:18, (relevance, prejudicial, best evidence rule)
17		22:21-24:22, (relevance, prejudicial, best evidence rule)
18		25:3-25:14, (relevance, prejudicial, best evidence rule)
19		29:16-31:21, (relevance, prejudicial, best evidence rule)
20		41:3-42:19, (relevance, prejudicial, best evidence rule)
21		45:9-46:1, (relevance, prejudicial, best evidence rule)
22		47:23-50:5, (relevance, prejudicial, best evidence rule)
23		51:1-53:9, (relevance, prejudicial, best evidence rule)
24		59:13-60:21, (relevance, prejudicial, best evidence rule)
25		63:14-63:25, (relevance, prejudicial, best evidence rule)
26		64:24-70:10, (relevance, prejudicial, best evidence rule)
27		71:10-72:24, (relevance, prejudicial, best evidence rule)
28		73:9-74:14, (relevance, prejudicial, best evidence rule)
		75:25-76:17, (relevance, prejudicial, best evidence rule)
		77:17-78:12, (relevance, prejudicial, best evidence rule)
		79:1-81:14, (relevance, prejudicial, best evidence rule)
		82:8-83:2, (relevance, prejudicial, best evidence rule)
		84:13-86:9, (relevance, prejudicial, best evidence rule)
		87:6-87:24, (relevance, prejudicial, best evidence rule)
		94:19-96:9, (relevance, prejudicial, best evidence rule)
		102:21-103:19, (relevance, prejudicial, best evidence rule)
		106:7-107:10, (relevance, prejudicial, best evidence rule)
		108:17-109:18, (relevance, prejudicial, best evidence rule)
		110:1-112:2, (relevance, prejudicial, best evidence rule)
		114:9-118:17(relevance, prejudicial, best evidence rule)
	Kim Balogh	12:24-14:4, (relevance, prejudicial, speculative, best evidence rule)
		18:3-19:2, (relevance, prejudicial, speculative, best evidence rule)
		19:11-20:24, (relevance, prejudicial, speculative, best evidence rule)
		22:4-25:20, (relevance, prejudicial, speculative, best evidence rule)
		26:22-29:15, (relevance, prejudicial, speculative, best evidence rule)
		30:9-33:5, (relevance, prejudicial, speculative, best evidence rule)
		33:14-33:23 (relevance, prejudicial, speculative, best evidence rule)

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

David Olivieri John	11:24-14:2, (relevance, prejudicial, best evidence rule) 14:14-15:15, (relevance, prejudicial, best evidence rule) 16:25-17:16, (relevance, prejudicial, best evidence rule) 20:1-20:16, (relevance, prejudicial, best evidence rule) 24:4-24:25, (relevance, prejudicial, best evidence rule) 26:2-26:24, (relevance, prejudicial, best evidence rule) 28:3-28:10, (relevance, prejudicial, best evidence rule) 30:3-30:17, (relevance, prejudicial, best evidence rule) 31:14-32:4, (relevance, prejudicial, best evidence rule) 32:17-36:1, (relevance, prejudicial, best evidence rule) 36:7-37:14, (relevance, prejudicial, best evidence rule) 37:22-42:1, (relevance, prejudicial, best evidence rule) 42:15-43:15, (relevance, prejudicial, best evidence rule) 44:2-45:7, (relevance, prejudicial, best evidence rule) 49:7-50:7, (relevance, prejudicial, best evidence rule) 51:8-51:16, (relevance, prejudicial, best evidence rule) 52:19-53:5, (relevance, prejudicial, best evidence rule) 53:18-54:14, (relevance, prejudicial, best evidence rule) 55:19-57:12, (relevance, prejudicial, best evidence rule) 57:21-58:20, (relevance, prejudicial, best evidence rule) 61:3-62:3, (relevance, prejudicial, best evidence rule) 64:14-64:22, (relevance, prejudicial, best evidence rule) 65:11-66:21, (relevance, prejudicial, best evidence rule) 71:8-73:5, (relevance, prejudicial, best evidence rule) 77:6-77:13, (relevance, prejudicial, best evidence rule) 77:19-78:5(relevance, prejudicial, best evidence rule)
Robert Simmons	13:3-13:15, (relevance, prejudicial, best evidence rule) 14:24-15:4, (relevance, prejudicial, best evidence rule) 19:21-20:14, (relevance, prejudicial, best evidence rule) 23:3-25:10, (relevance, prejudicial, best evidence rule) 28:3-29:11, (relevance, prejudicial, best evidence rule) 30:6-31:9, (relevance, prejudicial, best evidence rule) 34:25-37:8, (relevance, prejudicial, best evidence rule) 38:24-39:22, (relevance, prejudicial, best evidence rule) 41:10-42:14(relevance, prejudicial, best evidence rule)
Jaswinder Grover	11:23-13:13, (relevance, prejudicial, best evidence rule) 17:6-17:22, (relevance, prejudicial, best evidence rule) 20:5-21:8, (relevance, prejudicial, best evidence rule) 21:21-22:13, (relevance, prejudicial, best evidence rule) 23:1-24:11, (relevance, prejudicial, best evidence rule) 25:2-27:18, (relevance, prejudicial, best evidence rule) 29:18-31:3, (relevance, prejudicial, best evidence rule) 32:3-33:1, (relevance, prejudicial, best evidence rule) 35:18-38:21, (relevance, prejudicial, best evidence rule) 39:2-41:20, (relevance, prejudicial, best evidence rule) 43:2-43:6, (relevance, prejudicial, best evidence rule) 44:16-48:25, (relevance, prejudicial, best evidence rule)

MAINOR WIRTH, LLP
 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
 Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	49:1-49:25, (relevance, prejudicial, best evidence rule) 50:8-52:5, (relevance, prejudicial, best evidence rule) 53:3-55:14, (relevance, prejudicial, best evidence rule) 59:5-61:4, (relevance, prejudicial, best evidence rule) 62:10-64:7, (relevance, prejudicial, best evidence rule) 66:2-68:17, (relevance, prejudicial, best evidence rule) 70:4-74:6, (relevance, prejudicial, best evidence rule) 74:23-76:9, (relevance, prejudicial, best evidence rule) 77:7-78:15, (relevance, prejudicial, best evidence rule) 80:3-81:25, (relevance, prejudicial, best evidence rule) 84:11-85:3, (relevance, prejudicial, best evidence rule) 89:4-93:12, (relevance, prejudicial, best evidence rule) 94:6-94:13, (relevance, prejudicial, best evidence rule) 94:14-96:18, (relevance, prejudicial, best evidence rule) 96:21-97:14, (relevance, prejudicial, best evidence rule) 8:3-102:14, (relevance, prejudicial, best evidence rule) 104:7-105:16, (relevance, prejudicial, best evidence rule) 106:6-111:21(relevance, prejudicial, best evidence rule)
Sonalolita Wilson pt. II	170:8-180:1, (relevance, prejudicial, expert opinion, best evidence rule) 184:2-185:5, (relevance, prejudicial, expert opinion, best evidence rule) 185:6-186:17, (relevance, prejudicial, expert opinion, best evidence rule) 187:18-191:4, (relevance, prejudicial, expert opinion, best evidence rule) 191:15-192:8, (relevance, prejudicial, expert opinion, best evidence rule) 196:23-198:7, (relevance, prejudicial, expert opinion, best evidence rule) 205:1-207:17, (relevance, prejudicial, expert opinion, best evidence rule) 209:24-217:17, (relevance, prejudicial, expert opinion, best evidence rule) 218:22-220:11, (relevance, prejudicial, expert opinion, best evidence rule) 222:1-223:20, (relevance, prejudicial, expert opinion, best evidence rule) 225:3-227:8, (relevance, prejudicial, expert opinion, best evidence rule) 233:14-236:15, (relevance, prejudicial, expert opinion, best evidence rule) 237:14-239:14, (relevance, prejudicial, expert opinion, best evidence rule) 241:7-245:4, (relevance, prejudicial, expert opinion, best evidence rule) 248:3-249:4(relevance, prejudicial, expert opinion, best evidence rule)

VII.

The following witnesses may be called by the parties at trial:

- (a) **Plaintiff intends to call the following witnesses at trial:**
 1. Plaintiff, SONALOLITA WILSON
 c/o /o Bradley S. Mainor, Esq.
 Joseph J. Wirth, Esq.
 Ash Marie Blackburn, Esq.
 Joseph W. Guindy, Esq.
 MAINOR WIRTH, LLP
 6018 S. Fort Apache Road, Ste. 150

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 Las Vegas, NV 89148
2 (702) 464-5000
- 3 2. Nakia McCloud
4 c/o United States Attorney's Office
5 501 Las Vegas Blvd. South, Suite 1100,
6 (702) 388-6336
- 7 3. Bobby Warren
8 c/o United States Attorney's Office
9 501 Las Vegas Blvd. South, Suite 1100
10 (702) 388-6336
- 11 4. The FRCP 30(b)(6) Witness for the United States of America
12 c/o United States Attorney's Office
13 501 Las Vegas Blvd. South, Suite 1100
14 (702) 388-6336
- 15 5. Defendant, Liceth Demha-Santiago
16 c/o the Law Offices of Denise McCurry
17 7251 West Lake Mead Blvd. #349
18 Las Vegas, NV 89128
19 (702) 408-3805
- 20 6. Defendant, Juan Demha,
21 c/o the Law Offices of Denise McCurry
22 7251 West Lake Mead Blvd. #349, Las Vegas, NV 89128, (702) 408-3805
- 23 7. Calvin Hayes
24 Address and phone number unknown
- 25 8. Geraldine Gray
26 1232 Crafton Ave. #B
27 Menton, CA 92359
28 (909) 562-625
9. Latasha Wilson
3027 N. Orange Ave.
Rialto, CA 92377
(909) 543-5163
10. Tamika Williams
6666 W. Washington Ave.
Bldg 4, Apt. 123
Las Vegas, NV
89107, (702) 472-4134

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 11. Makita Cooper
2 2093. Guthrie, Apt. C
3 Highland, CA 92404
 (909) 684-1444

- 4 12. Robert Lee Hinton
5 98 S. Martin Luther King, Apt. 234
6 Las Vegas, NV 89106
 (810) 618-1344

- 7 13. Michael Tucker
8 98 S. Martin Luther King, Apt. 234
9 Las Vegas, NV 89106
 (503) 209-9954

- 10 14. Candice Hinton
11 98 S. Martin Luther King, Apt. 234
12 Las Vegas, NV 89106
 phone number unknown

- 13 15. Officer Ireland, Badge # 6044
14 Las Vegas Metropolitan Police Department,
15 400 S. Martin Luther King Blvd.
16 Las Vegas, NV 89106
 (702) 828-3111

- 17 16. Officer Swan, Badge # 7303
18 Las Vegas Metropolitan Police Department
19 400 S. Martin Luther King Blvd.
20 Las Vegas, NV 89106
 (702) 828-3111

- 21 17. Jaswinder Grover, M.D.
22 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
23 Nevada Spine Clinic
24 7401 Smoke Ranch Rd. #150
25 Las Vegas, NV 89128
 (702) 320-8111

- 26 18. Babuk Ghuman, M.D.
27 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
28 Nevada Spine Clinic
 7140 Smoke Ranch Rd. #150
 Las Vegas, NV 89128
 (702) 320-8111

- 19. Mark Glyman, M.D., DDS, FACS

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
- 2 Mark Glyman, M.D., DDS, FACS
- 3 1775 Village Center Cir, #150
- 4 Las Vegas, NV, 89113
- 5 (702) 507-5555

- 6 20. Thomas Dunn, M.D.
- 7 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
- 8 Desert Orthopedic Center
- 9 2800 E. Dessert Inn Rd., Ste 100
- 10 Las Vegas, NV 89121
- 11 (702) 731-1616

- 12 21. Don Nobis, MSPT
- 13 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
- 14 Don Nobis Physical Therapy
- 15 1950 E. Desert inn Rd.,
- 16 Las Vegas, NV 89169
- 17 (702) 735-1501

- 18 22. Louie Jan Singson, RN
- 19 Care Pro Home Health
- 20 5280 S. Eastern Ave, G2
- 21 Las Vegas, NV 89119
- 22 (702) 430-9517

- 23 23. Philip M. Paleracio, DDS
- 24 Dental Center of NV, 5280 S. Eastern Ave, G2
- 25 Las Vegas, NV 89119
- 26 (702) 430-9517

- 27 24. David Oliveri, M.D.
- 28 851 S. Rampart Dr., # 115,
- Las Vegas, NV 89145
- (702) 778-9300

- 25. Ira Spector, M.S., C.R.C.
- 3440 E. Russell Rd., #208
- Las Vegas, NV 89120,
- (702) 214-4294

- 26. Samuel Terry
- Exhibit A
- P.O. Box 530111
- Henderson, NV 89053

- 27. Robert Simmons

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1911 E. Gary Way
Phoenix, AZ 85042
 - 28. Michael Freeman
Med Dr. Ph.D., Forensic Research & Analysis
4256 NW 10th Ave. # 306
Portland, OR 97209
 - 29. Frank Perez, Ph.D.,
4435 N. First St., #205
Livermore, CA
 - 30. Kimberly E. Balough, MSBE
BiCoastal Forensics LLC
21143 Hawthorne Boulevard, Suite 415
Torrance, CA 90503
(480) 540-6213
 - 31. James G. Lowe, MD, FACS
Lowe-Greenwood-Zerbo Spinal Associates
1999 New Road, Suite B
Linwood, NJ, 08221
(609) 601-6363
 - 32. Mark Remas, MA, CRC, ABVE
The Remas Group
7710 Balboa Avenue, Suite 218-H
San Diego, CA, 92111
(858) 560-6733
 - 33. Warren M. Torchinsky, DDS
223 East Main Street
Maple Shade, NJ, 08052
(856) 667-7900
 - 34. Thomas F. Cargill, PhD, LTD,
65 Bennington Court,
Reno NV, 89511
(702) 849-1588
- a) Plaintiff may call the following witnesses at trial if the need arises (the number of witnesses on this list that may be called heavily depends on Defendant’s position as to the admissibility of Plaintiff’s medical records):**
- 1. Erica Johnson, the FRCP 30(b)(6) Witness(es) and/or the Person Most Knowledgeable Records for Las Vegas Metropolitan Police Department
400 S. Martin Luther King Blvd.

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 Las Vegas, NV 89106
2 (702) 828-3111
- 3 2. Kimberly E. Balough, MSBE
4 BiCoastal Forensics LLC
5 21143 Hawthorne Boulevard, Suite 415
6 Torrance, CA 90503
7 (480) 540-6213
- 8 3. James G. Lowe, MD, FACS
9 Lowe-Greenwood-Zerbo Spinal Associates
10 1999 New Road, Suite B
11 Linwood, NJ, 08221
12 (609) 601-6363
- 13 4. Mark Remas, MA, CRC, ABVE
14 The Remas Group
15 7710 Balboa Avenue, Suite 218-H
16 San Diego, CA, 92111
17 (858) 560-6733
- 18 5. Warren M. Torchinsky, DDS
19 223 East Main Street
20 Maple Shade, NJ, 08052
21 (856) 667-7900
- 22 6. Thomas F. Cargill, PhD, LTD,
23 65 Bennington Court,
24 Reno NV, 89511
25 (702) 849-1588
- 26 7. Rick Chavez, MD
27 Pain and Addiction Integrated Network, Inc.,
28 4733 Torrance Boulevard, Suite 625
Torrance, CA, 90506
(323) 833-8269
8. Julie Shaked, Special Field Claims Representative
Farmers Insurance Company
P.O. Box 268994
Oklahoma City, OK, 73126-8994
(800) 435-7764
9. Jason Register, Fleet Services Representative General Services Administration
Phoenix Fleet Management Center
GSA Fleet, Zone 4,
702-605-9892

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 10. David Holland
c/o United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100
(702) 388-6336

- 11. Jared Robbins
c/o United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100
(702) 388-6336

- 12. Glen Banks, EMT
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Las Vegas Fire Rescue
500 N. Casino Center Blvd., Lane
Las Vegas, NV 89101

- 13. Carlos Maltiz, Advanced EMT
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Las Vegas Fire Rescue
500 N. Casino Center Blvd., Lane
Las Vegas, NV 89101

- 14. Jefferson D. Bracey, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
Rec EMP or Clark, (collectively Dr. Bracey), 901 Rancho Dr., #207, Las
Vegas, NV 89106, (702) 385-0890

- 15. Sandra Lee, MD
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
for Desert Radiologist
2020 Palomino Ln., Las Vegas, NV 89106
(702) 759-8600

- 16. Van Nguyen, MD,
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Desert Radiologist
2020 Palomino Ln.
Las Vegas, NV 89106
(702) 759-8600

- 17. Brent Yamishita, P.T., D.P.T
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Better Back Physical Therapy
1740 Smoke Ranch Road
Las Vegas, Nevada 89128

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 18. Magdalen Marron, PTA
2 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
3 Better Back Physical Therapy
4 1740 Smoke Ranch Road
5 Las Vegas, Nevada 89128

- 6 19. Nicole Hoffman, PT. MSPT,ART Practitioner
7 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
8 Better Back Physical Therapy
9 1740 Smoke Ranch Road
10 Las Vegas, Nevada 89128

- 11 20. Monique A. Mogensen, M.D.
12 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
13 Records for American Radiology
14 6460 Medical Center Dr., #150,
15 Las Vegas, NV 89148
16 (702) 868-278

- 17 21. Michael B. Zlatkin, M.D.
18 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
19 Records for American Radiology
20 6460 Medical Center Dr., #150
21 Las Vegas, NV 89148
22 (702) 868-2781

- 23 22. Matt Treinen, D.O.
24 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
25 for Pueblo Medical Imaging
26 8551 W. Lake Mead Blvd., #150
27 Las Vegas, NV 89128
28 (702) 228-003

- 23. Raj Agrawal, M.D.
 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
 Desert Radiology
 2020 Palomino Lane
 Las Vegas, NV 89106
 (702) 759-8600

- 24. Janet Bauman, Ph.D.
 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
 LF Mortillaro, Ph.D., LTD
 501 S. Rancho Dr. #F37,
 Las Vegas, NV 89106
 (702) 388-9403

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 25. Duff Kaster, D.D.S.
2 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
3 Abbey Dental
4 4408 S. Eastern Ave.
5 Las Vegas, NV 89119
6 (702) 731-5700

- 7 26. John Lyons, PT
8 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
9 Lyons Home Care
10 600 S. Tonapah Dr. #230
11 Las Vegas, NV 89106-8912
12 (702) 476-0222

- 13 27. Damon Elliot, PTA
14 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
15 Lyons Home Care
16 600 S. Tonapah Dr. #230
17 Las Vegas, NV 89106-8912
18 (702) 476-0222

- 19 28. Apichai Haisupa, PT,
20 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
21 Lyons Home Care
22 600 S. Tonapah Dr. #230
23 Las Vegas, NV 89106-8912
24 (702) 476-0222

- 25 29. Danny Thai, RPh
26 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
27 LienRx
28 2600 W. Sahara Ave.
 Las Vegas NV 89102
 (702) 257-2620

- 30. James Peterson, M.D.
 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
 Records for Desert Radiology
 2020 Palomino Lane,
 Las Vegas, NV 89106
 (702) 759-8600

- 31. Sukhjinder Singh, M.D.
 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
 Desert Radiology
 2020 Palomino Lane,
 Las Vegas, NV 89106

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 (702) 759-8600
- 2 32. David Plunkett, M.D.
- 3 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 4 Records for Desert Radiology
- 5 2020 Palomino Lane,
- 6 Las Vegas, NV 89106
- 7 (702) 759-8600
- 8 33. The FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 9 PayLater Pharmacy
- 10 552 E. Charleston Blvd.
- 11 Las Vegas, NV 89104
- 12 34. Daniel Thai RPh
- 13 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 14 LienRx
- 15 26000 W. Sahara Ave. # 120
- 16 Las Vegas, NV 89102
- 17 35. Lori Ortale, RPh
- 18 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 19 Las Vegas Pharmacy
- 20 2600 W. Sahara Ave. # 120
- 21 Las Vegas, NV 89102
- 22 36. Michael Lundberg, D.O.
- 23 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 24 Mountain View Hospital
- 25 3100 N. Tenaya Way
- 26 Las Vegas, NV 89128
- 27 (702) 962-5000
- 28 37. Amit Valera, D.O.
- FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- Mountains Edge Hospital
- 8656 W. Patrick Ln.
- Las Vegas, NV 89148
- (702) 777-7100
38. FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
- Valley Hospital
- 620 Shadow Lane
- Las Vegas, NV 89106
- (702) 388-4000
39. Huy N. Nguyen, M.D.
- FRCP 30(B)(6) Witness and/or Person Most Knowledgeable

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- Valley Hospital
620 Shadow Lane
Las Vegas, NV 89106
(702) 853-3000
40. Badreldin A. Ibrahim, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Smoke Ranch Specialists
41. Magalen Page, PTA
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Kindred Transitional Care and Rehabilitation
5850 S. Rainbow Blvd.
Las Vegas, NV 89118
(702) 470-1102
42. Amir Aftab, M.D
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Kindred Transitional Care and Rehabilitation
5850 S. Rainbow Blvd.
Las Vegas, NV 89118
(702) 470-1102
43. Ali Badday, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
American Radiology
7140 Smoke Ranch Rd. Ste. B
Las Vegas, NV 89128
(702) 868-2781
44. Dr. Badday
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Precision Diagnostic Imaging/Upright MRI
6460 Medical Center Drive, Suite 150
Las Vegas, Nevada 89148
45. Michael Abiog, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
American Radiology/Precision Diagnostic Imaging
7140 Smoke Ranch Rd. Ste. B
Las Vegas, NV 89128
(702) 868-2781
46. Ken Hughes, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Desert Anesthesiologists, Inc.
6655 W. Sahara Ave. #B200

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

- 1 Las Vegas, NV 89146
2 (702) 933-3999
- 3 47. Christopher Milford, M.D.
4 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
5 Christopher M. Milford, M.D.
6 2585 Montessouri St., #100
7 Las Vegas, NV 89117
8 (702) 272-0694
- 9 48. Danny Thai
10 FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
11 Specialty Pharmacy
12 241 N. Buffalo Dr. # 150
13 Las Vegas, NV 89145
- 14 49. Daniel T. Shiode Ph.D., ABPP
15 FRCP 30(b)(6) Witness and/or Person Most Knowledgeable
16 Shiode Psychotherapy, Inc.
17 501 S. Rancho Dr. , Ste I-64
18 Las Vegas, NV 89106
19 (702) 384-4110
- 20 50. Russell Shah, M.D.
21 FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
22 Radar Medical Group
23 2628 W. Charleston Blvd.
24 Las Vegas, NV 89102
25 (702) 644-0600
- 26 51. Michael I. Rothman, M.D.
27 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
28 Records for Opensided MRI
600 Rancho Dr. # 101,
Las Vegas, NV 89106
(702) 932-2740
- 52. Keith Lewis, M.D.
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
Opensided MRI
600 Rancho Dr. # 101
Las Vegas, NV 89106
(702) 932-2740
- 53. Decorah Perkins, NP.
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
Grand Desert Psychiatric Services

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 2021 S. Jones Blvd.
Las Vegas, NV 89146
(702) 202-0099
- 54. Anita Rich, M.D.
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Precision Diagnostic Imaging
7140 Smoke Ranch Rd Ste. B
Las Vegas, NV 89128
(702) 868-2781
- 55. Simon Farrow, M.D.
FRCP 30(b0(6) witness and/or Person Most Knowledgeable
Monitoring Associates
9811 W. Charleston Blvd.
Las Vegas, NV 89117
(833) 664-6342
- 56. Craig Carroll, D.O.
NRCP 30(b0(6) witness and/or Person Most Knowledgeable
Monitoring Associates
9811 W. Charleston Blvd.,
Las Vegas, NV 89117
(833) 664-6342
- 57. Zahld Hamid, M.D
FRCP 30(b0(6) witness and/or Person Most Knowledgeable
Dr. Hamid
9811 W. Charleston Blvd.
Las Vegas, NV 89117,
(833) 664-6342
- 58. Mike Phillips
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Next Step Medical
8285 W. Arby Ave. Ste. 155
Las Vegas, NV 89113
- 59. Demetrice Davis, M.D.
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
Red Rock Radiology Associates
7130 Smoke Ranch Rd STE 101
Las Vegas, Nevada 89128
- 60. Ronald F Sauer, Jr., DO
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
Red Rock Radiology Associates

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7130 Smoke Ranch Rd STE 101
Las Vegas, Nevada 89128

61. Edward Sisson, CPO
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable
Prove Partners, LLC, Prosthetic Center of Excellence
2047 West Charleston Blvd Suite 100
Las Vegas, NV 89102

62. Dawn Neilson, CFom
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Prove Partners, LLC, Prosthetic Center of Excellence
2047 West Charleston Blvd Suite 100
Las Vegas, NV 89102

63. FRCP 30(b)(6) witness, and/or Person Most Knowledgeable
Dental/Southern Nevada General Dentistry Prada, PLLC,
2250 S. Rancho Dr., #205,
Las Vegas, NV 89102
(702) 291-2031

64. Mark Lawrence, RTP
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
Don Nobis Physical Therapy
1950 E. Desert inn Rd.,
Las Vegas, NV 89169
(702) 735-1501

65. Plaintiff reserves the right to call any witnesses identified in Defendants’ witness
list and named during the course of discovery;

66. Plaintiff reserves the right to call rebuttal and/or impeachment witnesses at trial;

67. Plaintiff reserves the right to call any of Defendants’ experts as witnesses.

Defendant, USA, objects to the vast number of witnesses and potential witnesses provided
by Plaintiff above. In addition, Defendant, USA objects to the designation of a Fed. R. Civ. P.
30(b)(6) witness as that rule applies to deposition testimony and not testimony related to trial.
Furthermore, Plaintiff fails to list specific topics to be covered by any 30(b)(6) witness. Defendant
USA reserves all rights of objections to testimonies at trial including but not limited to any expert
opinions that were not timely disclosed in discovery, lack foundation, and/or are not relevant and
reliable. *See, e.g.,* Fed. R. Civ. P. 26(a)(2), 37(c)(1), *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S.

1 579 (1993) and its progeny. Defendant, USA, also objects to testimony by any witness that was not
2 disclosed during the discovery period or whose testimony was already excluded by the Court,
3 including Dr. Oliveri.

4
5 **(a) Defendant USA's Witnesses**

- 6 1. Nakia McCloud
7 c/o United States Attorney's Office
8 501 Las Vegas Blvd. South, Suite 1100,
9 (702) 388-6336
- 10 2. Plaintiff, SONALOLITA WILSON
11 c/o /o Bradley S. Mainor, Esq.
12 Joseph J. Wirth, Esq.
13 Ash Marie Blackburn, Esq.
14 Joseph W. Guindy, Esq.
15 MAINOR WIRTH, LLP
16 6018 S. Fort Apache Road, Ste. 150
17 Las Vegas, NV 89148
18 (702) 464-5000
- 19 3. Defendant, Liceth Demha-Santiago
20 c/o the Law Offices of Denise McCurry
21 7251 West Lake Mead Blvd. #349
22 Las Vegas, NV 89128
23 (702) 408-3805
- 24 4. Defendant, Juan Demha,
25 c/o the Law Offices of Denise McCurry
26 7251 West Lake Mead Blvd. #349,
27 Las Vegas, NV 89128,
28 (702) 408-3805
5. Kimberly E. Balough, MSBE
BiCoastal Forensics LLC
21143 Hawthorne Boulevard, Suite 415
Torrance, CA 90503
(480) 540-6213
6. Rick Chavez, MD
Pain and Addiction Integrated Network, Inc.,
4733 Torrance Boulevard, Suite 625
Torrance, CA, 90506
(323) 833-8269

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. James G. Lowe, MD, FACS
Lowe-Greenwood-Zerbo Spinal Associates
1999 New Road, Suite B
Linwood, NJ, 08221
(609) 601-6363

8. Mark Remas, MA, CRC, ABVE
The Remas Group
7710 Balboa Avenue, Suite 218-H
San Diego, CA, 92111
(858) 560-6733

9. Warren M. Torchinsky, DDS
223 East Main Street
Maple Shade, NJ, 08052
(856) 667-7900

10. Thomas F. Cargill, PhD, LTD,
65 Bennington Court,
Reno NV, 89511
(702) 849-1588

Defendant, USA, reserves the right to call any witnesses identified in Plaintiff's witness list and named during the course of discovery;

- 11. Defendant reserves the right to call rebuttal and/or impeachment witnesses at trial;
- 12. Defendant reserves the right to call any of Plaintiff's experts as witnesses.

(b) Defendants' DEMHA-SANTIAGO, and DEMHA's Witnesses

- 1. Plaintiff, SONALOLITA WILSON
c/o /o Bradley S. Mainor, Esq.
Joseph J. Wirth, Esq.
Ash Marie Blackburn, Esq.
Joseph W. Guindy, Esq.
MAINOR WIRTH, LLP
6018 S. Fort Apache Road, Ste. 150
Las Vegas, NV 89148
(702) 464-5000
- 2. Nakia McCloud
c/o United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100,
(702) 388-6336
- 3. Defendant Liceth Demha-Santiago
c/o Hall Jaffe and Clayton, LLP

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7425 Peak Drive
Las Vegas, NV 89128

4. Defendant Juan Demha
c/o Hall Jaffe and Clayton, LLP
7425 Peak Drive
Las Vegas, NV 89128

5. Officer Swan, Badge No. 7303
Las Vegas Metropolitan Police Department
400 South Martin Luther King Boulevard
Las Vegas, NV 89103

6. Hugh S. Selznick, MD
Consultants Medical Group
2500 West Sahar Ave., Suite 207
Las Vegas, NV 89102

7. Defendants reserve the right to call any and all witnesses identified in Plaintiff’s witness list and named during the course of discovery;

8. Defendants reserve the right to call any and all witnesses identified in Defendant USA’s witness list and named during the course of discovery;

9. Defendants reserve the right to call rebuttal and/or impeachment witnesses at trial;

10. Defendants reserve the right to call any of Plaintiff’s experts as witnesses.

11. Defendants reserve the right to call any of Defendant USA’s experts as witnesses.

VIII.

The attorneys or parties have met and jointly offer these trial dates:

November 28, 2022 through December 2, 2022

January 17, 2023 through 2023

January 23, 2023 through January 27, 2023

February 13, 2023 through February 17, 2023

February 21, 2023 through February 24, 2023

It is expressly understood by the undersigned that the court will set the trial of this matter

1 on one of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the
2 court's calendar.

3 **IX.**

4 Plaintiff estimates that the trial will take a total of 17-21 days. Defendant USA will not
5 stipulate to the authenticity of Plaintiff's medical records. As such, Plaintiff will be required to call
6 a witness from each of her facilities to authenticate records from all forty-four (44) medical
7 providers. Defendants Demha-Santiago and Demha had no objection to stipulating to the
8 authenticity of Plaintiff's medical records.

9 Defendant USA believes the number of witnesses Plaintiff intends to call is excessive and
10 less time is needed. Defendant USA believes it can present its case-in-chief in 2-3 days.

11 APPROVED AS TO FORM AND CONTENT:

12 DATED this 11th day of May, 2022.

DATED this 11th day of May, 2022.

13 **MAINOR WIRTH, LLP**

HALL JAFFE & CLAYTON, LLP

14
15 /s/ Ash Marie Blackburn
16 BRADLEY S. MAINOR, ESQ.
17 Nevada Bar No. 7434
18 ASH MARIE BLACKBURN, ESQ.
19 Nevada Bar No. 14712
6018 S. Fort Apache Road, Ste. 150
Las Vegas, NV 89148-5652
Counsel for Plaintiff

/s/ Jan Tomasik
STEVEN T. JAFFE, ESQ.
Nevada Bar No. 7035
JAN K. TOMASIK, ESQ.
Nevada Bar No. 15104
7425 Peak Drive
Las Vegas, NV 89128
*Attorneys for Defendant/Cross-
Claimant/Cross-Defendant Juan Demha
And Cross-Claimant/Cross-Defendant Liceth
Dehma-Santiago*

20
21 DATED this 11th day of May, 2022.

22 **UNITED STATES DISTRICT**
23 **ATTORNEY**

24 /s/ Skyler Pearson
25 SKYLER PEARSON, ESQ.
26 PATRICK ROSE, ESQ.
27 501 Las Vegas Blvd, South., Ste. 1100
28 Las Vegas, NV 89101
*Attorney for Defendant United States of
America*

MAINOR WIRTH, LLP
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

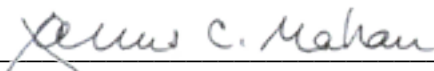
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

X.

ACTION BY THE COURT

This case is set for jury trial on **January 23, 2023, at 9:00 a.m.** Calendar call will be held on **January 18, 2023, at 1:30 p.m.** This pretrial order has been approved by the parties to this action as evidenced by their signatures or the signatures of their attorneys hereon, and the order is hereby entered and will govern the trial of this case. This order may not be amended except by court order and based upon the parties' agreement or to prevent manifest injustice.

DATED: May 20, 2022.



UNITED STATES DISTRICT JUDGE

MAINOR WIRTH, LLP

6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148
Phone: (702) 464-5000 | Fax: (702) 463-4440

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;
LICETH DEMHA-SANTIAGO; JUAN
DEMHA; DOES I THROUGH X; AND
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

Stipulated Exhibits

Exhibit	Description
1.	Manpower Employment File
2.	Plaintiff's Employment Records From Staffmark
3.	TrueBlue Records/ Peopleready Regarding Plaintiff's Earnings

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

EXHIBIT A-1

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;
LICETH DEMHA-SANTIAGO; JUAN
DEMHA; DOES I THROUGH X; AND
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Stipulated Exhibits Available For Use At
The Time of Trial But Are Not Currently
Admitted**

Exhibit	Description
1.	Plaintiff's First Amended Complaint
2.	Defendant United States' Answer to Plaintiff's First Amended Complaint
3.	Defendants' Liceth Demha-Santiago and Juan Demha's Answer to Plaintiff's First Amended Complaint
4.	Life Expectance Table
5.	Transcripts of Deposition of Babuk Guman, M.D., With Exhibits
6.	Transcript of Deposition of Rick Chavez, M.D., With Exhibits
7.	Transcript of deposition of Liceth Demha
8.	Transcript of deposition of Mark L. Glyman, M.D., D.D.S., F.A.C.S., with exhibits
9.	Transcript of deposition of Robert L. Hinton
10.	Transcript of deposition of Duff Kaster, D.D.S., with exhibits
11.	Transcript of deposition of Nakia McCloud, with exhibits
12.	Transcript of deposition of Sonalolita G. Wilson, with exhibits. Vol 1
13.	Transcript of deposition of Sonalolita G. Wilson, with exhibits Vol 2

1	14.	Transcript of deposition of Kimberly E. Balogh
2	15.	Transcript of deposition of David J. Oliveri M.D
3	16.	Transcript of deposition of Robert Simmons
4	17.	Transcript of deposition of Thomas Dunn, M.D
5	18.	Transcript of deposition of Jaswinder Grover, M.D
6	19.	Transcript of deposition of Frank A. Perez, Ph.D
7	20.	David Oliveri, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
8	21.	David Oliveri, M.D. Expert Report dated December 2, 2019
9	22.	David Oliveri, M.D. Supplemental Expert Report dated August 4, 2020
10	23.	Ira Spector M.S. C.R.C, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
11	24.	Ira Spector M.S. C.R.C, Expert Report dated December 12, 2019
12	25.	Ira Spector M.S. C.R.C, Rebuttal Expert Report dated July 23, 2020
13	26.	Samuel R. Terry Curriculum Vitae, Testimony List, and Fess Schedule
14	27.	Samuel R. Terry Expert Report dated June 3, 2020
15	28.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Curriculum Vitae
16	29.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Expert Report dated July 8, 2020
17	30.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Rebuttal Expert Report dated August 5, 2020
18	31.	Frank Perez, Ph.D Curriculum Vitae, Testimony List, and Fess Schedule
19	32.	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
20	33.	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
21	34.	Robert Simmons Curriculum Vitae, Testimony List, and Fess Schedule
22	35.	Robert Simmons Rebuttal Expert Report dated August 7, 2020
23	36.	Terrence M. Clauretie, Ph.D. Curriculum Vitae, Testimony List, and Fess Schedule
24		

1	37.	Terrence M. Clauretie, Ph.D. Expert Report dated February 4, 2020
2	38.	Thomas Dunn, MD Curriculum Vitae, Testimony List, and Fess Schedule
3	39.	Thomas Dunn, MD Rebuttal Expert Report dated August 3, 2020
4	40.	Travis Snyder, D.O. Curriculum Vitae, Testimony List, and Fess Schedule
5	41.	Travis Snyder, D.O. Rebuttal Expert Report dated August 7, 2020
6	42.	Travis Snyder, D.O. Presentation
7	43.	Kimberly Balogh's Expert Report (dated July 7, 2020)
8	44.	Kimberly Balogh's Rebuttal Expert Report (dated August 7, 2020)
9	45.	Kimberly Balogh's Curriculum Vitae, Testimony List, and Fess Schedule
10	46.	Deposition of Kimberly Balogh (November 4, 2020)
11	47.	Dr. James Lowe's Expert Report (dated April 27, 2020)
12	48.	Dr. James Lowe's Rebuttal Expert Report (dated July 27, 2020)
13	49.	Dr. James Lowe's Curriculum Vitae, Testimony List, and Fess Schedule
14	50.	Dr. Rick Chavez's Expert Report (dated July 7, 2020)
15	51.	Dr. Rick Chavez's Curriculum Vitae, Testimony List, and Fess Schedule
16	52.	Deposition of Chavez (August 27, 2020)
17	53.	Dr. Warren Torchinsky's Expert Report (dated November 12, 2019)
18	54.	Dr. Warren Torchinsky's Curriculum Vitae, Testimony List, and Fess Schedule
19	55.	Mark Remas's Expert Report (dated April 28, 2020)
20	56.	Mark Remas's Curriculum Vitae, Testimony List, and Fess Schedule
21	57.	Dr. Thomas Cargill's Rebuttal Expert Report (dated August 3, 2020)
22	58.	Dr. Thomas Cargill's Curriculum Vitae, Testimony List, and Fess Schedule
23	59.	Curriculum Vitae, Fee schedule, Prior Testimony List and Reports authored by Mark Glyman, M.D., DDS, FACS
24	60.	Google Overhead Photo Depicting the Subject Intersection (1)
	61.	Google Overhead Photo Depicting the Subject Intersection (2)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

62.	Color Photo Depicting the Scene of the Subject Incident (1)
63.	Color Photo Depicting the Scene of the Subject Incident (2)
64.	Color Photo Depicting the Scene of the Subject Incident (3)
65.	Color Photo Depicting the Scene of the Subject Incident (4)
66.	Color Photo Depicting the Scene of the Subject Incident (5)
67.	Color Photo Depicting the Scene of the Subject Incident (6)
68.	Black and White Photo Depicting Plaintiff's Property Damage (1)
69.	Black and White Photo Depicting Plaintiff's Property Damage (2)

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;
LICETH DEMHA-SANTIAGO; JUAN
DEMHA; DOES I THROUGH X; AND
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

Plaintiff's Exhibits

Exhibit	Description	Defendants Demha-Santiago and Demha's Objections	Defendant USA's Objections
1.	Traffic Accident Report #LVM160901003306	Prejudicial, Relevance, Foundation, Best Evidence Rule	Relevance; prejudicial; foundation; best evidence
2.	Traffic Accident Report #LVM160901002946	Prejudicial, Relevance, Foundation, Best Evidence Rule	Relevance; prejudicial; foundation; best evidence
3.	Custodian of Records for 911 recordings and breakdown	Relevance, Prejudicial	Hearsay; prejudicial; authenticity
4.	911 Recordings	Relevance, Prejudicial	Hearsay; prejudicial; authenticity
5.	Transcribed Statement of Def. Demha-Santiago	Privileged, Relevance, Prejudicial, Foundation, Best Evidence Rule	Prejudicial; foundation; best evidence
6.	IRS Incident Report	Relevance, Prejudicial, Foundation, Best Evidence Rule	Privileged; prejudicial; foundation; best evidence
7.	Color Photo Depicting Plaintiff's Property Damage		(No Bates Number Provided) Relevance; foundation; authenticity

1	8.	Farmers Insurance Exchange Property Damage Estimate of Plaintiff's Vehicle	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
2				
3	9.	Black Box Data for Defendant's Vehicle - GMC Terrain 2014	Relevance, Prejudicial	Prejudicial; foundation; best evidence; authenticity
4				
5	10.	Vehicle information regarding vehicle driven by Nikia McCloud's	Relevance, Prejudicial	Prejudicial; foundation; best evidence; authenticity
6				
7	11.	Plaintiff's Employee Wage Sheet with Manpower	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
8	12.	Plaintiff's Employment Records From Staffmark	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
9				
10	13.	TrueBlue Records/Peopleready Regarding Plaintiff's Earnings	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
11	14.	Life Expectance Table	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
12				
13	15.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (1)	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
14				
15				
16	16.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (2)	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
17				
18				
19	17.	Video of Plaintiff Depicting Full Body Seizure Taken by Robert Hinton	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
20				
21	18.	Video of Plaintiff Depicting Right Leg Spasm Taken by Robert Hinton	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
22				
23				
24	19.	Video of Plaintiff Depicting Leg Spasms	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best

1		When Walking Taken by Robert Hinton	evidence; authenticity; hearsay
2	20.	Video of Plaintiff Depicting Full Body Seizure	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
3			Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
4	21.	Video of Plaintiff Depicting Right Leg Spasm	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
5			Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
6	22.	Video of Plaintiff Depicting Right Leg Spasm	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
7			Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
8	23.	Plaintiff Medical Specials Chart	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
9			Relevance; prejudicial; foundation; best evidence; authenticity
10	24.	Medical Records and Billing with Custodian of Records for City of Las Vegas Fire and Rescue for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
11			Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
12	25.	Medical Records and Billing with Custodian of Records for City of University Medical Center for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
13			Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
14	26.	Medical Records and Billing for McCourt PLLC a/k/a EMP of Clark UMC for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
15			Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
16	27.	Medical Records and Billing with Custodian of Records for Desert Radiology Solutions Dates of Service	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
17			Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
18			
19			
20			
21			
22			
23			
24			

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

	September 1, 206 Through December 6, 2017		
28.	Medical Records and Billing with Custodian of Records for Nevada Spine Clinic Dates of Service September 8, 2016 Through April 15, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
29.	Medical Records and Billing with Custodian of Records for Better Back Physical Therapy Dates of Service September 9, 2016 for Through December 2, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
30.	Medical Records and Billing with Custodian of Records for Mark Glyman, M.D. Dates of Service September 13, 2016 Through April 7., 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
31.	Medical Records and Billing with Custodian of Records for American Radiology Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
32.	Medical Records and Billing with Custodian of Records for Desert Orthopaedics Center Dates of Service September 30, 2016 Through March 15, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
33.	Medical Records and Billing with Custodian of Records for Pueblo Medical Imaging Dates	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity

1		of Service September 30, 2016		
2	34.	Medical Records and Billing for Absolute Dental Date of Service October 13, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3				
4	35.	Medical Records and Billing with Custodian of Records for Desert Anesthesiologist, Inc. Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5				
6	36.	Medical Records and Billing with Custodian of Records for Specialty Surgery Center Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7				
8	37.	Medical Records and Billing with Custodian of Records for Abby Dental Center, Inc. Dates of Service February 27, 2017 Through March 15, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
9				
10	38.	Medical Records and Billing with Custodian of Records for Smoke Ranch Surgery Center Dates of Service December 6, 2017 Through December 13, 2021	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
11				
12	39.	Medical Records and Billing with Custodian of Records for Don Nobis Progressive Physical Therapy Dates of Service December 26, 2017 Through February 8, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

1	40.	Medical Records and Billing with Custodian of Records for Silver State Neurology Dates of Service January 2, 2018 Through February 26, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2				
3				
4				
5	41.	Medical Records and Billing with Custodian of Records for Louis F. Mortillaro Dates of Service November 14, 2018 Through December 5, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6				
7				
8				
9	42.	Medical Records and Billing for Lien RX Dates of Service January 4, 2017 Through January 23, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
10				
11				
12	43.	Medical Records and Billing with Custodian of Records for Specialty Pharmacy Dates of Service January 4, 2019 Through February 25, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13				
14				
15	44.	Medical Records and Billing with Custodian of Records for Smoke Ranch Specialists Dates of Service January 10, 2019 Through May 2, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
16				
17				
18				
19	45.	Medical Records and Billing for CarePro Home Health, Dates of Service January 11, 2019 Through February 11, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
20				
21				
22	46.	Medical Records and Billing with Custodian of Records for Lyons Home Care Dates of Service January 12,	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
23				
24				

1		2019 Through February 1, 2019		
2	47.	Medical Records and Billing with Custodian of Records for PayLater Pharmacy Date of Service January 23, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3				
4				
5				
6	48.	Medical Records and Billing with Custodian of Records for Comprehensive Medical Dates of Service January 29, 2019 Through April 26, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7				
8				
9				
10	49.	Medical Records and Billing with Custodian of Records for American Medical Response Date of Service May 2, 2019 Through May 20, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
11				
12				
13	50.	Medical Records and Billing with Custodian of Records for Las Vegas Pharmacy Dates of Service March 8, 2019 Through July 1, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
14				
15				
16				
17	51.	Medical Records and Billing with Custodian of Records for Mountain View Hospital Dates of Service May 2, 2019 Through May 3, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
18				
19				
20	52.	Medical Records and Billing with Custodian of Records for Fremont Emergency Services Date of Service May 2, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
21				
22				
23	53.	Medical Records and Billing with Custodian of Records for	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best
24				

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

	Mountains Edge Hospital Dates of Service May 3, 2019 Through May 6, 2019		evidence; authenticity
54.	Medical Records and Billing with Custodian of Records for Valley Hospital Medical Center Dates of Service May 10, 2019 Through May 12, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
55.	Medical Records and Billing with Custodian of Records for Shadow Emergency Physicians Date of Service May 8, 2019 through May 14, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
56.	Medical Records and Billing with Custodian of Records for Monitoring Associates Date of Service May 15, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
57.	Medical Records and Billing with Custodian of Records for Summerlin Hospital Medical Center Dates of Service May 15, 2019 Through May 20, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
58.	Medical Records and Billing with Custodian of Records for Kindred Hospital Las Vegas-Sahara Campus Dates of Service May 21, 2019 Through July 4, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
59.	Medical Records and Billing with Custodian of Records for Next Step Medical Date of Service July 3, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity

1	60.	Medical Records and Billing with Custodian of Records for Dental Center of Nevada Date of Service September 16, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2				
3				
4	61.	Medical Records and Billing with Custodian of Records for Zynex Medical, Inc. Date of Service November 21, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5				
6				
7				
8	62.	Medical Records and Billing with Custodian of Records for Shiode Psychotherapy, Inc. Dates of Service December 12, 2019 Through March 9, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
9				
10				
11				
12	63.	Medical Records and Billing with Custodian of Records for Radar Medical Group Dates of Service January 16, 2020 Through August 7, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13				
14				
15				
16	64.	Medical Records and Billing with Custodian of Records for Open Sided MRI Dates of Service February 2, 2020 Through February 7, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
17				
18				
19	65.	Medical Records and Billing with Custodian of Records for Grand Desert Psychiatric Services Dates of Service March 16, 2020 Through May 14, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
20				
21				
22				
23	66.	Medical Records and Billing with Custodian of Records for Las Vegas Health Services	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best
24				

1		Dates of Service July 8, 2020 Through August 4, 2020		evidence; authenticity
2				
3	67.	Medical Records and Billing for Silver State Adult Day care Dates of Service October 1, 2020 Through November 4, 2021	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4				
5				
6	68.	Medical Records and Billing with Custodian of Records for Prove Partners Dates of Service May 12, 2021 Through February 8, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7				
8				
9				
10	69.	Defendant United State's Responses and Objections to Plaintiff's First Set of Interrogatories	Defendant objects to the improper use of USA's written discovery responses as trial exhibits. The responses mistake evidence. Relevance, Prejudicial, Hearsay, Best Evidence Rule, Foundation	Relevance; prejudicial; Hearsay; best evidence; foundation
11				
12				
13				
14	70.	Defendant United State's Responses and Objections to Plaintiff's First Set of Requests for Production	Defendant objects to the improper use of USA's written discovery responses as trial exhibits. The responses mistake evidence. Relevance, Prejudicial, Hearsay, Best Evidence Rule, Foundation	Relevance; prejudicial; Hearsay; best evidence; foundation
15				
16				
17	71.	Defendant Liceth Demha Santiago's Responses to Plaintiff's Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
18				
19	72.	Defendant Liceth Demha Santiago's Responses to Plaintiff's Request for Production of Documents		Relevance; prejudicial; Hearsay; best evidence; foundation
20				
21				
22				
23				
24				

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ; LICETH
DEMHA-SANTIAGO; JUAN DEMHA;
DOES I THROUGH X; AND ROE
CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Defendant United States of America's
Exhibits**

Defendant United States of America hereby provide its list of trial exhibits:

<u>Ex No.</u>	<u>Exhibit Description</u>	Defendants Demha-Santiago and Demha's Objections	Plaintiff's Objections
504	2018 W-4 Completed Form for Sonalolita Wilson		Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
506	Plaintiff's Response to Defendant United States' First Set of Interrogatories (dated May 31, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
507	Plaintiff's First Supplemental Response to Defendant United States' First Set of Interrogatories (dated November 8, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
508	Plaintiff's Second Supplemental Response to Defendant United States' First Set of Interrogatories (dated January 28, 2021)		Relevance; prejudicial; Hearsay; best evidence; foundation
509	Plaintiff's Third Supplemental Response to Defendant USA's First Set of		Relevance; prejudicial; Hearsay;

<u>Ex No.</u>	<u>Exhibit Description</u>	Defendants Demha-Santiago and Demha's Objections	Plaintiff's Objections
	Interrogatories (dated February 5, 2021)		best evidence; foundation
510	Plaintiff's Response to Defendant United States' Second Set of Interrogatories (dated November 22, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
511	Plaintiff's Response to Defendant United States' Third Set of Interrogatories (dated March 20, 2020)		Relevance; prejudicial; Hearsay; best evidence; foundation
512	Plaintiff's Response to Defendant Demha's First Set of Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
513	Plaintiff's First Supplemental Response to Defendant Demha's First Set of Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
514	Plaintiff's Second Supplemental Response to Defendant Demha's First Set of Interrogatories (February 5, 2021)		Relevance; prejudicial; Hearsay; best evidence; foundation
515	Demha Defendants' Answers to Plaintiffs' Interrogatories (dated February 28, 2020)		

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONALOLITA WILSON,

Plaintiff,

vs.

UNITED STATES OF AMERICA; LICETH
DEMHA-SANTIAGO; JUAN DEMHA; DOES
I through X; and ROE CORPORATIONS I
through X, inclusive

Defendants.

CASE NO.: 2:18-cv-01241-JCM-NKJ

**Defendant Liceth Demha-Santiago and
Juan Demha’s Exhibits**

Exhibit	Description	Defendant USA’s Objections	Plaintiff’s Objections
1.	Damage Estimate of 2005 Toyota Corolla	Relevance; prejudicial; foundation; best evidence; authenticity	
2.	Farmers Insurance Exchange Estimate of Record for 2005 Toyota Corolla	Relevance; prejudicial; foundation; best evidence; authenticity	
3.	CCC One Market Valuation Report	Relevance; prejudicial; foundation; best evidence; authenticity	
4.	Medical Records and Billing from Mark L. Glyman M.D.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
5.	Medical Records, Billing and Films from American Radiology	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
6.	Medical Records and Billing from Nevada Spine Clinic	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
7.	Medical Records and Billing from Smoke Ranch Surgery Center	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
8.	Medical Records and Billing from Don Nobis Progressive Physical Therapy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
9.	Billing from Abbey Dental Center, Inc.	Relevance; prejudicial; hearsay; foundation; best	

		evidence; authenticity	
10.	Medical Records and Billing from Absolute Dental	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
11.	Billing from Las Vegas Pharmacy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
12.	Medical records, films and billing from Kindred Rehabilitation Hospital	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
13.	Billing from Smoke Ranch Specialists	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
14.	Medical records and billing from Daniel Shiode, Ph.D.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
15.	Grand Desert Psychiatric Services		
16.	Medical records and billing from Monitoring Associates/Neuromonitoring Associates	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
17.	Medical records and billing from Zynex	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
18.	Medical records and films from Precision Diagnostic Imaging	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
19.	Records and billing from Silver State Adult Day Care	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
20.	Medical Records and Billing from Las Vegas Health Services, Inc.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
21.	Medical Records and Billing from Silver State Neurology	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
22.	Next Step Medical	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
23.	Medical Billing from Prove Partners	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
24.	Medical billing and records Absolute Dental/Southern Nevada General Dentistry	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	

1		Prada, PPLC	
2	25.	Medical billing and records for Care Pro Home Health	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	26.	Medical billing and records for Dental Center of NV	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	27.	Las Vegas Fire and Rescue Receipts	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	28.	University Medical Center of Southern Nevada Receipt	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	29.	EMP of Clark UMC	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7		McCourt PLLC Medical Group Receipt	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
8	30.	University Medical Center of Southern Nevada, Department of Radiology Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
9	31.	Better Back Physical Therapy under Nevada Spine Clinic	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
10	32.	Mark L. Glyman, M.D., D.D.S.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
11	33.	Desert Orthopaedic Center Health Insurance Claim Form	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
12	34.	Pueblo Medical Imaging Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13	35.	Specialty Surgery Center Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
14	36.	Better Back Physical Therapy Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
15	37.	Desert Orthopaedic Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
16	38.	Dr. Mark Glyman Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
17	39.	Las Vegas Fire and Rescue Responsive Records	Relevance; prejudicial; hearsay; foundation; best

		evidence; authenticity	
40.	Pueblo Medical Imaging Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
41.	Specialty Surgery Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
42.	University Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
43.	Desert Orthopaedic Center Responsive Radiology Images	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
44.	Specialty Surgery Center Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
45.	Lien RX Billing Responsive Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
46.	Orthopedic Specialty Hospital of Nevada Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
47.	Orthopedic Specialty Hospital of Nevada Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
48.	Mountain View Hospital Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
49.	Lyons Home Care Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
50.	Better Back Physical Therapy Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
51.	Specialty Surgery Center Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
52.	Kindred Transitional Care and Rehabilitation-Spring Valley Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
53.	Valley Hospital Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
54.	University Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best	

	and Billing Records	evidence; authenticity	
55.	University Medical Center Responsive Radiology Declaration and Records (disc)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
56.	Dr. Louis F. Mortillaro Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
57.	Abbey Dental Responsive Records and X-Rays	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
58.	Valley Hospital Responsive Radiology Discs (2)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
59.	Summerlin Hospital Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
60.	Red Rock Diagnostics Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
61.	986 Pharmacy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
62.	Mountain View Hospital Responsive Radiology Records and Disc (1)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
63.	Paylater Pharmacy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
64.	Desert Orthopaedic Center Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
65.	Desert Radiology Responsive Medical Records and Radiology Discs	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
66.	Pueblo Medical Imaging Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
67.	Pueblo Medical Imaging Response Radiology Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
68.	Mountain View Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
69.	Summerlin Hospital Responsive Radiology	Relevance; prejudicial; hearsay; foundation; best	

1		Records	evidence; authenticity	
2	70.	Pueblo Medical Imaging Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
3	71.	Better Back Physical Therapy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
4	72.	OpenSided MRI Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
5	73.	Dr. David Oliveri Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
6	74.	Radar Medical Group Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
7	75.	OpenSided MRI Responsive Medical and Radiology Records (disc)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
8	76.	Red Rock Diagnostics Responsive Billing Records for OpenSided MRI	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
9	77.	Desert Anesthesiologist Responsive Billing and Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
10	78.	Allegiant Spine Institute	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
11	79.	Certified Vocational Services		Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
12	80.	Las Vegas Fire and Rescue	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
13	81.	Specialty Pharmacy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
14	82.	Sonia Wilson's Summary Slide of Imaging Findings Consistent with the History of Trauma Dated 9/1/16	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
15	83.	Life Expectancy Table	Relevance; prejudicial; foundation; best evidence; authenticity	

1	84.	Defendant, Liceth Demha-Santiago's Responses to Plaintiff's Request for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	
2				
3	85.	Defendants Liceth Demha-Santiago & Juan Demha's Answers to Plaintiffs' Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	
4				
5	86.	Plaintiff's Response to Defendant United States' First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
6				
7				
8	87.	Plaintiff's First Supplemental Response to Defendant United States' First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
9				
10	88.	Plaintiff's Third Supplemental Response to Defendant USA's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
11				
12				
13	89.	Plaintiff's Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
14				
15	90.	Plaintiff's First Supplemental Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
16				
17				
18	91.	Plaintiff's Second Supplemental Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
19				
20	92.	Plaintiff's Response to Defendant USA's First Set of Requests for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
21				
22				
23	93.	Plaintiff's First Supplemental Response to Defendant USA's First Set	Defendant USA herein reserve all objections pending notice of particular	Relevance; prejudicial; Hearsay; best
24				

	of Requests for Production of Documents	responses to be read	evidence; foundation
94.	Plaintiff's Second Supplemental Response to Defendant USA's First Set of Requests for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
95.	Plaintiff's Response to United States' Second Set of Interrogatories to Plaintiff	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
96.	Plaintiff's Response to Defendant United States' Third Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
97.	United States' Responses and Objections to Plaintiffs' First Set of Requests for Production of Documents	Relevance; prejudicial; Hearsay; best evidence; foundation	
98.	United States' Responses and Objections to Plaintiffs' First Set of Interrogatories	Relevance; prejudicial; Hearsay; best evidence; foundation	
99.	Photographs of Plaintiff's vehicle	(No Bates Number Provided) Relevance; foundation; authenticity	
100.	Google Overheads	Relevance; prejudicial; foundation; best evidence; authenticity	
101.	T-Mobile Phone Records	Relevance; prejudicial; foundation; best evidence; authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
102.	Black Box Data for Defendant's Vehicle - GMC Terrain 2014	Prejudicial; foundation; best evidence; authenticity	
103.	IRS Claim Denial with Receipt February 9, 2018	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
104.	IRS Claim Denial without Receipt September 5, 2019	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
105.	IRS Claim Denial with Receipt September 5, 2019	Relevance; prejudicial; foundation	Relevance; prejudicial;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

			foundation
106.	Government Pictures and Wilson Claim Information	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
107.	IRS Denying Claim for Damages October 6, 2016	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
108.	Nakia McCloud Driver License	Relevance; foundation; best evidence; authenticity	
109.	IRS Vehicle Information	Relevance; prejudicial; foundation	