

DOCK. NO. UWY-CV-15-6025912-S : SUPERIOR COURT  
JAMES GRECHIKA : J. D. OFWATERBURY  
V. : AT WATERBURY  
WHOLE FOODS MARKET  
GROUP, INC. : MAY 8, 2015

**PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES**

The plaintiff, James Grechika, hereby gives notice of his disclosure of medical expert witnesses who may testify at the trial of this matter as follows:

**Identity**

1. Waterbury Hospital Personnel  
64 Robbins Street  
Waterbury CT
2. Richard Manzo, M.D.  
1320 West Main Street, #4  
Waterbury, CT 06708
3. Naugatuck Valley Surgical Center Personnel  
160 Robbins Street  
Waterbury, CT 06708

In addition, the plaintiff reserves the right to elicit expert opinions through cross-examination of any expert witness called by the defendant at trial.

**Subject Matter**

The general subject matter upon which the medical experts will testify includes the medical condition of the plaintiff; examinations, findings and diagnosis; the nature and extent of the plaintiff's injuries; the causation of those injuries; treatment;

recommendations; the plaintiff's prognosis; future treatment and the cost of same; and any permanency.

**Substance of Facts and Opinions**

1. Waterbury Hospital Personnel

Evidence is expected to relate to the plaintiff's physical condition, examination and treatment of the plaintiff on May 5, 2013; that the plaintiff complained of left wrist pain and swelling; that x-rays which revealed a fracture; that the plaintiff was discharged. Hospital personnel are expected to testify that the plaintiff's treatment was reasonable and necessary and that his injuries and treatment were causally related to his slip and fall accident on May 4, 2013.

Additionally, Hospital personnel are expected to testify in accordance with the contents of their records and reports disclosed to defense counsel.

2. Richard Manzo, M.D.

Dr. Manzo will testify regarding his examination and treatment of the plaintiff. It is expected that Dr. Manzo will testify in accordance with his treatment notes that have been provided through discovery. Evidence or testimony will include the nature and extent of the plaintiff's injuries, causation and prognosis. Dr. Manzo will testify that the injuries the plaintiff suffered were directly related to the accident of May 4, 2013 and are permanent. These injuries include: left displaced interarticular radial styloid fracture, 7% impairment left wrist. Dr. Manzo is expected to testify that his treatment

of the plaintiff for injuries sustained in the May 4, 2013, accident, as more fully described in his medical reports and records, was both reasonable and necessary.

Additionally, Dr. Manzo is expected to testify in accordance with the contents of his reports disclosed to defense counsel.

### 3. Naugatuck Valley Surgical Center Personnel

Evidence is expected to relate to the plaintiff's physical condition, examination and treatment of the plaintiff on May 15, 2013; that the plaintiff presented for ORIF radial styloid fx screw fixation on October 15, 2013. Personnel are expected to testify that the plaintiff's treatment was reasonable and necessary and that his injuries and treatment were causally related to his slip and fall accident on May 4, 2013.

Additionally, personnel are expected to testify in accordance with the contents of their records and reports disclosed to defense counsel.

### **Summary of Grounds for Opinions**

The medical witnesses opinions will be based upon their examination and treatment of the plaintiff, interviews with the plaintiff, review of medical records, reports and diagnostic test results; and upon their medical education, experience and training.

THE PLAINTIFF,

//430809

By \_\_\_\_\_

Joseph Rossetti, Esq.

MOORE, O'BRIEN, YELENAK & FOTI

**CERTIFICATION**

I certify that a copy of this document was mailed or delivered electronically or non-electronically on **May 8, 2015** to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

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