

DOCKET NO. HHB-CV-15-6029045-S : SUPERIOR COURT
ANTHONY GEORGER : J. D. OF NEW BRITAIN
VS. : AT NEW BRITAIN
SHELDON CROSBY, ET. AL. : SEPTEMBER 29, 2015

PRACTICE BOOK SECTION 13-4 DISCLOSURE

Name and Address

Mark C. Fletcher, D.M.D., M.D.
Avon Oral and Maxillofacial, LLP
34 Dale Road
Avon, CT 06001

Dr. Mark C. Fletcher a doctor of oral and maxillofacial medicine may be called as an expert witness to testify regarding the injuries sustained by the plaintiff, Anthony Georger, the nature, extent and treatment of the injuries, and/or the cause of the injuries. The testimony is expected to be that as a result of the August 20, 2013 assault:

1. The plaintiff sustained a right mandibular parasymphysis fracture, left mandibular subcondylar fracture, right superior orbital rim fracture, right orbital roof fracture and right frontal sinus fracture;
2. As stated in Dr. Fletcher's operative dated August 20, 2013, the plaintiff underwent surgical procedure to repair injuries referenced above. Dr. Fletcher's opinions are based upon his treatment of the plaintiff as evidenced by his medical records disclosed on September 15, 2015, which are incorporated herein as fully set forth; and
3. That all medical services rendered to the plaintiff were reasonable and necessary and that all charges therefore were reasonable.

It is expected that the health care providers will base their testimony on their education, training and experience, and on their observations and examinations of the plaintiff.

Name and Address

CT Children's Medical Center
282 Washington Street
Hartford, CT 06108

Mark C. Fletcher, DMD, MD, Matthew Vincent, MD, Vincent Laurich, M.D., or the keeper of records for CT Children's Medical Center may be called as expert witnesses to testify regarding the injuries sustained by the plaintiff, Anthony Georger, the nature, extent and treatment of the injuries, and/or the cause of the injuries. The testimony is expected to be that as a result of the August 20, 2013 assault:

1. The plaintiff sustained right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to my head; multiple abrasions to his head, skull and right knee; multiple contusions, a loss of consciousness; and a concussion. The plaintiff also had a BB pellet imbedded into his left hand.
2. As stated in CT Children's Medical Center's records, Mr. Georger's injuries were resultant from an assault and battery on August 20, 2013. Testimony will be that the plaintiff surgery on August 20, 2013 to repair his multiple injuries, and that surgery was successful, as evidenced by the medical records disclosed on September 15, 2015, which are incorporated herein as fully set forth; and
3. That all medical services rendered to the plaintiff were reasonable and necessary and that all charges therefore were reasonable.

It is expected that the health care providers will base their testimony on their education, training and experience, and on their observations and examinations of the plaintiff.

Name and Address

Jefferson Radiology
399 Farmington Avenue
Farmington, CT 06032

David L. Zimmerman, MD, Martha M. Greenwood, MD, David Blonder, M.D., or the keeper of records for Jefferson Radiology may be called as expert witnesses to testify regarding the injuries sustained by the plaintiff, Anthony Georger, the nature, extent and treatment of the injuries, and/or the cause of the injuries. The testimony is expected to be that as a result of the August 20, 2013 assault:

1. The plaintiff underwent CT-Scans and on August 20, 2013 to assist in making a determination as to the plaintiff's injuries to his facial bones, cranium and brain. The plaintiff also had x-rays taken of his left hand on August 20, 2013 to assist in making a determination as to the plaintiff's injuries to his left hand. The plaintiff underwent post-surgical CT-Scans on August 27, 2013 for reassessment of his injuries;
2. As noted in the medical records from Jefferson Radiology, Mr. Georger sustained sinus fractures; orbital blowout fractures, a rightward deviation of the osseous nasal septum with posterior osseous nasal septal spur pointing leftward. All opinions are based upon treatment of the plaintiff as evidenced by his medical records disclosed on September 15, 2015, which are incorporated herein as fully set forth; and
3. That all medical services rendered to the plaintiff were reasonable and necessary and that all charges therefore were reasonable.

It is expected that the health care providers will base their testimony on their education, training and experience, and on their observations and examinations of the plaintiff.

Name and Address

Hartford Hospital
Head Injury Clinic
80 Seymour Street
Hartford, CT 06102

All health care providers including Inam Kureshi, M.D. or the keeper of records for Hartford Hospital, may be called as an expert witness to testify regarding the injuries sustained by the plaintiff, the nature, extent and treatment of the injuries, and/or the cause of the injuries. The testimony is expected to be that as a result of the August 20, 2013 assault:

1. The plaintiff sustained head trauma, as a result of being struck during the August 20, 2013 assault;
2. As stated in Dr. Kureshi's record dated June 17, 2014, the plaintiff symptoms included frontal headaches; short-term memory impairment; and sensory changes. Dr. Kureshi opined that the plaintiff had post-concussion syndrome and prescribed nortriptyline at bedtime and an outpatient neuropsychiatry evaluation. Dr. Kureshi's opinions are based upon his treatment of the plaintiff as evidenced by his medical records disclosed on September 15, 2015, which is incorporated herein as fully set forth; and
3. That all medical services rendered to the plaintiff were reasonable and necessary and that all charges therefore were reasonable.

It is expected that the health care providers will base their testimony on their education, training and experience, and on their observations and examinations of the plaintiff.

Name and Address

Martin D. Oliveira, Psy.D.
Clinical Neuropsychologist
Northeast Neuropsychology, LLC
700 West Johnson Avenue, Suite 310
Cheshire, CT 06410

Dr. Martin D. Oliveira, a clinical neuropsychologist may be called as an expert witness to testify regarding the injuries sustained by the plaintiff, the nature, extent and treatment of the injuries, and/or the cause of the injuries. The testimony is expected to be that as a result of the August 20, 2013 assault:

1. The plaintiff has experienced headaches, fatigue ongoing distress, significant mood lability involving depression and anxiety, as well as periods of irritability/agitation;
2. As stated in Dr. Oliveira's July 29, 2014 evaluation report, the plaintiff's headaches and fatigue may result in periods of cognitive inefficiency on a day-to-day basis. All opinions are based upon the plaintiff's treatment as evidenced by the medical records disclosed on September 15, 2015, which are incorporated herein as fully set forth; and
3. That all medical services rendered to the plaintiff were reasonable and necessary and that all charges therefore were reasonable.

It is expected that the health care providers will base their testimony on their education, training and experience, and on their observations and examinations of the plaintiff.

Name and Address

Detective Tracy L. Enns
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Detective Tracy L. Enns, Badge No. 0653, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Detective Enns will base her testimony on her education, training, experience, her expertise in her field, her investigation, her

review of physical evidence and statements by the witnesses. Detective Enns responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Detective Enns will testify as to her findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

Officer Eric C. Augustyn
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Officer Eric C. Augustyn, Badge No. 0032, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Officer Augustyn will base his testimony on his education, training, experience, his expertise in his field, his investigation, his review of physical evidence and statements by the witnesses. Officer Augustyn responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Officer Augustyn will testify as to his findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

Detective Brian M. Killiany
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Detective Brian M. Killiany, Badge No. 1301, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Detective Killiany will base his testimony on his education, training, experience, his expertise in his field, his investigation, his

review of physical evidence and statements by the witnesses. Detective Killiany responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Detective Killiany will testify as to his findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

Officer Edward A. Moehringer
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Officer Edward A. Moehringer, Badge No. 1756, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Officer Moehringer will base his testimony on his education, training, experience, his expertise in his field, his investigation, his review of physical evidence and statements by the witnesses. Officer Moehringer responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Officer Moehringer will testify as to his findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

Sargent Patrick J. Buckley
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Sargent Patrick J. Buckley, Badge No. 0184, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Sargent Buckley will base his testimony on his education, training, experience, his expertise in his field, his investigation, his

review of physical evidence and statements by the witnesses. Sargent Buckley responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Sargent Buckley will testify as to his findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

Detective Susan L. Divenere
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Detective Susan L. Divenere, Badge No. 0508, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Detective Divenere will base her testimony on her education, training, experience, her expertise in her field, her investigation, her review of physical evidence and statements by the witnesses. Detective Divenere responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Detective Divenere will testify as to her findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

Name and Address

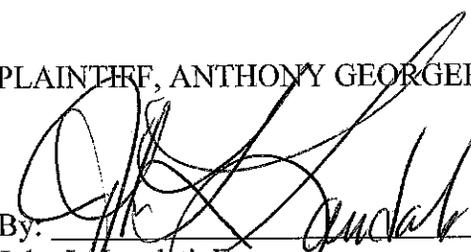
Officer Douglas S. Frink
Farmington Police Department
319 New Britain Avenue
Farmington, CT 06085

The investigating police officer, Officer Douglas S. Frink, Badge No. 0780, of the Farmington Police Department may be called as an expert witness to testify regarding the investigation of the August 20, 2013 assault. It is expected that Officer Frink will base his testimony on his education, training, experience, his expertise in his field, his investigation, his

review of physical evidence and statements by the witnesses. Officer Frink responded to the incident and prepared the police incident report, which is incorporated herein as fully set forth. To summarize Officer Frink will testify as to his findings that:

1. The plaintiff, Anthony Georger, was assaulted at 14 Colton Street in Farmington, Connecticut; and
2. As a result of the assault, the plaintiff, Anthony Georger, sustain injuries to his face/head and had been shot in the left hand with a BB gun.

PLAINTIFF, ANTHONY GEORGER

By: 

John L. Laudati, Esq.

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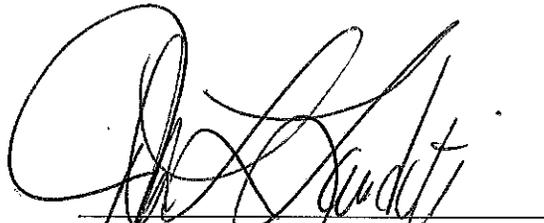
CERTIFICATION

This is to certify that a copy of the foregoing was mailed, via first-class mail, postage prepaid, on this 29th day of September, 2015 to the following parties of record:

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John L. Laudati,
Commissioner of the Superior Court