

DOCKET NO.: FBT-CV15-6048078-S : SUPERIOR COURT
JONATHAN SHAPIRO : JUDICIAL DISTRICT OF
PLAINTIFF : FAIRFIELD
V. : AT BRIDGEPORT
FRANK DELBOUNO, JR. : NOVEMBER 17, 2015
and CITY OF BRIDGEPORT
DEFENDANTS

PLAINTIFF'S SUPPLEMENTAL DISCLOSURE OF EXPERT WITNESS

Pursuant to Practice Book §13-4, et seq., the plaintiff, Jonathan Shapiro, hereby supplements the disclosure of expert witnesses whom he expects to call at the time of trial, as well as documents and records he may submit into evidence in lieu of live testimony of expert witnesses.

1. Dr. Jerald M. Perlman, Orthopaedic Surgeon, Orthopaedic Specialty Group, 75 Kings Highway Cutoff, Fairfield, CT 06824

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Perlman will testify, consistent with the medical records, concerning the diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries

and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Perlman will testify as to the plaintiff's physical condition during examination and treatment between February 21, 2013 and December 23, 2013 (as well as any subsequent treatment). Dr. Perlman will testify that, inter alia, the plaintiff suffers from a cervical sprain with right radiculitis and lumbar sprain as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Perlman will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, as well as the expected costs for the same.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Perlman will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent effects thereof, were caused and/or aggravated by the incident alleged in the Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Perlman will also testify in accordance with the medical

reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Perlman will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Perlman is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Perlman will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Perlman's evaluation of the plaintiff and his own education, training, knowledge and experience.

2. Dr. Perry A. Shear, Neurosurgeon, Orthopaedic Specialty Group, 75 Kings Highway Cutoff, Fairfield, CT 06824

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Shear will testify, consistent with the medical records, concerning the diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries

and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Shear will testify as to the plaintiff's physical condition during examination and treatment between February 21, 2013 and December 23, 2013 (as well as any subsequent treatment). Dr. Shear will testify that, inter alia, the plaintiff suffers from thoracic pain and stiffness, neck pain extending to the right trapezius, decreased range of motion in the cervical spine and decreased sensation along the medial aspect of the right forearm compared to the left as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Shear will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, as well as the expected costs for the same.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Shear will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent effects thereof, were caused and/or aggravated by the incident alleged in the

Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Shear will also testify in accordance with the medical reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Shear will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Shear is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Shear will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Shear's evaluation of the plaintiff and his own education, training, knowledge and experience.

3. Dr. Michael F. Saffir, Physical Medicine, Pain Management, Orthopaedic Specialty Group, 75 Kings Highway Cutoff, Fairfield, CT 06824

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Saffir will testify, consistent with the medical records, concerning the

diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Saffir will testify as to the plaintiff's physical condition during examination and treatment between January 8, 2014 and April 18, 2014 (as well as any subsequent treatment). Dr. Saffir will testify that, inter alia, the plaintiff suffers from cervicalgia, back and neck strain, cervical disk narrowing and disorder, thoracic sprain, right upper extremity pain, cubital tunnel syndrome, spasms, recurrent headaches and difficulty sleeping as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Saffir will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, as well as the expected costs for the same.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Saffir will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent effects thereof, were caused and/or aggravated by the incident alleged in the

Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Saffir will also testify in accordance with the medical reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Saffir will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Saffir is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Saffir will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Saffir's evaluation of the plaintiff and his own education, training, knowledge and experience.

4. Dr. Lawrence P. Kirshenbaum, Director of Pain Medicine Orthopaedic Specialty Group, 75 Kings Highway Cutoff, Fairfield, CT 06824

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Kirshenbaum will testify, consistent with the medical records, concerning

the diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Kirshenbaum will testify as to the plaintiff's physical condition during examination and treatment between March 18, 2014 and April 8, 2014 (as well as any subsequent treatment). Dr. Kirshenbaum will testify that, inter alia, the plaintiff suffers from decreased range of motion in cervical spine, cervical radiculitis, cervical spondylosis, myalgia, diffuse tenderness throughout the paraspinal neck and periscapular region bilaterally, constant pain in diffuse pattern through the neck and periscapular region bilaterally with occasional radiation to the interscapular region, as well as radiation to the right triceps region and difficulty sleeping as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Kirshenbaum will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, as well as the expected costs for the same.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Kirshenbaum will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent effects thereof, were caused and/or aggravated by the incident alleged in the Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Kirshenbaum will also testify in accordance with the medical reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Kirshenbaum will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Kirshenbaum is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Kirshenbaum will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Kirshenbaum's evaluation of the plaintiff and his own education, training, knowledge and experience.

5. Dr. Brett Carr, DC, MS, Orthopaedic Specialty Group, 75 Kings Highway Cutoff, Fairfield, CT 06824

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Carr will testify, consistent with the medical records, concerning the diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Carr will testify as to the plaintiff's physical condition during examination and treatment between May 8, 2013 and May 23, 2013 (as well as any subsequent treatment). Dr. Carr will testify that, inter alia, the plaintiff suffers from cervical sprain, back pain and headaches as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Carr will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, as well as the expected costs for the same.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Carr will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent effects thereof, were caused and/or aggravated by the incident alleged in the Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Carr will also testify in accordance with the medical reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Carr will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Carr is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Carr will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Carr's evaluation of the plaintiff and his own education, training, knowledge and experience.

THE PLAINTIFF

By: 
Kevin C. Shea
Clendenen & Shea, LLC
400 Orange Street
New Haven, Connecticut 06511
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CERTIFICATION:

This is to certify that a copy of the foregoing was sent via e-mail to Russell D. Liskov, Associate City Attorney, Office of the City Attorney at Russell.Liskov@bridgeportct.gov on November 17, 2015.



CLENDENEN & SHEA, LLC