# Martinez Plaintiff Expert Reports

Date: October 20, 2025

Case: Martinez v. Greenfield Logistics, Inc. (Mock Case)

Patient: Sarah Martinez  DOB: 07/12/1990  MRN: MM-20240315-001

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**Expert Summary:**

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# Michael P. Stevens, M.D. - Orthopedic Surgery Expert Report

Date: October 20, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Board-certified orthopedic surgeon with 22 years of experience specializing in upper extremity trauma
Chief of Orthopedics at St
Joseph’s Medical Center
Has testified in over 40 personal injury and workers’ compensation cases as an expert in fracture biomec

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Open reduction and internal fixation (ORIF) of the left humeral shaft fracture performed March 16, 2024
Postoperative imaging confirmed stable fixation and proper alignment
Residual impairment of approximately 25% to the left upper extremity.

## Opinions and Conclusions

Within a reasonable degree of medical probability, the humeral fracture, rib fractures, and pulmonary co
The treatment provided was medically necessary and consistent with the described mechanism of injury.

**Signature:** _____ Michael P. Stevens, M.D.

# Lisa Nguyen, M.D. - Anesthesiology Expert Report

Date: October 20, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Board-certified anesthesiologist with 15 years of perioperative experience at St Joseph’s Medical Center
Extensive expertise in orthopedic anesthesia, pain control, and post-anesthesia recovery protocols
Published in the Journal of Clinical Anesthesia (2023).

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Administered general anesthesia for ORIF of the left humerus
Induction and emergence were smooth; no airway difficulties or hemodynamic instability occurred
No anesthesia-related complications reported postoperatively.

## Opinions and Conclusions

The anesthetic management met all standards of care
No evidence suggests that anesthesia contributed to any postoperative morbidity or extended recovery per

**Signature:** _____Lisa Nguyen, M.D.

# Daniel Ross, PT, DPT - Physical Therapy / Rehabilitation Expert Report

Date: October 12, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Doctor of Physical Therapy with 18 years of clinical practice in orthopedic and trauma rehabilitation
Director of Rehabilitation Services at Evergreen Physical Therapy Associates
Provides expert testimony regarding functional impairment and rehabilitation outcomes.

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Patient attended 72 outpatient sessions between April and October 2024
Persistent range-of-motion deficit at six months (70% of pre-injury mobility)
Pain reduction from 8/10 to 3/10 with therapy
Strength and endurance improved, but functional ceiling reached due to scar tissue and nerve irritation.

## Opinions and Conclusions

Patient achieved maximal medical improvement
Continued maintenance therapy is indicated to preserve mobility and minimize chronic stiffness
Permanent partial impairment remains consistent with trauma-related soft tissue and bone injury.

**Signature:** _____ Daniel Ross, PT, DPT

# Laura M. Chen, M.D. - Pain Management / Physical Medicine Expert Report

Date: October 20, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Board-certified in Pain Medicine and Physical Medicine & Rehabilitation
17 years in practice with specialization in interventional spine and post-traumatic pain
Fellow of the American Academy of PM&R
Regular expert witness in pain-related injury claims.

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Three thoracic epidural steroid injections performed (August 20, October 5, and December 10, 2024)
Short-term relief of radicular thoracic pain noted, with overall baseline pain at 3–4/10 and episodic fl
Long-term medication regimen stable.

## Opinions and Conclusions

Chronic pain presentation is consistent with post-traumatic neuropathic and myofascial components second
Periodic interventional pain management every 6–12 months is reasonable and necessary.

**Signature:** _____Laura M. Chen, M.D.

# Jennifer Wong, Psy.D. - Clinical Psychology Expert Report

Date: October 20, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Licensed clinical psychologist specializing in trauma and anxiety disorders
12 years of experience, currently in private practice and consultant for trauma rehabilitation programs
Has testified in multiple personal injury cases regarding PTSD and adjustment disorders.

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Initial evaluation April 2, 2024
Symptoms included nightmares, avoidance behavior, and hypervigilance consistent with PTSD
Completed 26 CBT-based therapy sessions through September 2024
Notable improvement in sleep and affect regulation.

## Opinions and Conclusions

Within a reasonable degree of psychological certainty, the patient’s PTSD and anxiety symptoms were dire
Prognosis is favorable with continued therapy and medication management.

**Signature:** _____Jennifer Wong, Psy.D.

# Rebecca Morrison, RN, CLCP - Life Care Planning / Nursing Expert Report

Date: October 20, 2025

Engaged by: Plaintiff Counsel

## Qualifications and Background

Certified Life Care Planner and Registered Nurse with 20 years in catastrophic injury case management
Former trauma ICU nurse
Experience in cost projection, long-term rehabilitation, and future medical planning for orthopedic inju

## Materials Reviewed

- Complete St. Joseph’s Medical Center chart (March 15–19, 2024)
- Radiology studies and operative reports
- Physical therapy and pain management records
- Psychological evaluations and Life Care Plan summary

## Findings

Based on current records and expert reports, patient requires periodic medical follow-up, intermittent p
Anticipated future care cost estimated at $127,000 present value.

## Opinions and Conclusions

The projected future medical expenses are reasonable and directly attributable to the injuries sustained
Patient’s residual limitations will require long-term care coordination and maintenance therapy.

**Signature:** _____ Rebecca Morrison, RN, CLCP