

From: Teresa DiFalco cta-associates@cogeco.ca
Subject: summary of tel meeting with Sonja - April 4th at 12:30pm (with Suzanne and Teresa)
Date: April 5, 2016 at 4:06 PM
To: Sonja Nuic sonja@wynperlelaw.ca, Suzanne Young suzanne.young11@gmail.com

Hi Sonja and Suzie:

For Suzanne's benefit, I summarized our teleconference that we had yesterday. Sonja, please let me know if I captured the highlights correctly.

Sonja advised that they received a Summary Judgement Motion from two of the people named in Suzanne's Statement of Claim. These two individuals claim that they were medical students at the time and claim to have no knowledge of what happened to Suzanne. One of the students assisted the Anesthesiologist and would have been responsible for observing and taking notes during the procedure.

Sonja advised that they had Suzanne's medical records reviewed and examined by a registered nurse, who detected that Suzanne's head was tilted in a backwards position during the procedure. Teresa noted that this position would make Suzanne's head more vulnerable for injury. Sonja advised that they will be investigating this further to see if proper safety and restraints were used to protect Suzanne. Another reason why they can't justify letting these medical students go without first examining them.

These two defendants are seeking to dismiss the action against them and are seeking costs.

Sonja advised that the normal process would be to have cross examinations prior to agreeing to narrow down the list of defendants. Sonja also noted that it would cost these two named defendants less money to go through the regular process of being examined then it would to seek a summary judgement Motion to have this case dismissed against them.

Sonja advised that the hospital is not providing information and thus our only avenue in gathering evidence and information is through cross examinations and speaking with everyone who was present at the time of Suzanne's injury.

Sonja advised that they will be fighting this Motion and will need sworn Affidavits signed by Suzanne and Teresa. Sonja will send Teresa the Affidavits by Wednesday.

Teresa reminded Sonja that Cal was also present during the pre and post op of Suzanne's surgery on November 26, 2012. Cal also visited Suzanne regularly while Suzanne was in hospital. Cal is willing to participate as a witness to this incident. Teresa also informed Sonja that Cal was the Director of Major Health Strategies for the Province of Ontario with the Ministry of Health and Long-Term Care.

Summary taken by Teresa.

Teresa DiFalco
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