

ONTARIO SUPERIOR COURT OF JUSTICE

B E T W E E N:

SUZANNE YOUNG, CARI-ANN YOUNG
and THERESA DI FALCO
Plaintiffs

- and -

ST. JOSEPH'S HEALTHCARE HAMILTON,
DAVID RICHARD, JOHNSON SMALL, FREDERICK J. BAXTER,
NANCY DZAJA, ANNA DUL, NICHOLAS AFAGH, CATHERINE KELL,
BREANNA CORNELIU, JOSIELYN STACEY, ANNA MARIE WALTERS,
TINA-JACKSON BEEMER, MARY MENS, DIANE GARDINER,
JOHN DOE AND JANE DOE
Defendants

This is the Examination for Discovery of
CARI-ANN YOUNG, a Plaintiff herein, taken at the
offices of Nimigan Mihailovich Reporting, Suite 701,
One James Street South, Hamilton, Ontario, on the 21st
day of June, 2016.

APPEARANCES:

SONJA NUIC	For the Plaintiffs
WILLIAM J. BULLIVANT	For the Defendants St. Joseph's Healthcare Hamilton, Catherine Kell, Breanna Corneliu, Josielyn Stacey, Anna Marie Walters, Tina-Jackson Beemer, Mary Mens and Diane Gardiner
TREVOR COURTIS	For the Defendants Johnson Small, Frederick J. Baxter and Nancy Dzaja
SEAN MURTHA	For the Defendants Anna Dul and Nicholas Afagh

I N D E X

WITNESS: CARI-ANN YOUNG

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This should be regarded as merely a guide and does not necessarily constitute a full and complete list.

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-- EXAMINATION COMMENCED AT 2:29 P.M.

CARI-ANN YOUNG, Sworn:

EXAMINATION BY MR. COURTIS:

1 Q. As I mentioned, my name is Trevor
Courtis, and I'm one of the lawyers for Dr. Small,
Baxter, and Dzaja. Today is my opportunity on behalf
of the doctors to ask you some questions just about the
action that's being brought against them. If I ever
ask you a question you don't understand, please just
ask me, and I'll clarify. If at any point you need a
break, please just let me know.

A. Okay.

2 Q. Can you state your full name for the
record?

A. It's Cari-Ann Young.

3 Q. And you have been sworn in today?

A. Yes.

4 Q. Have you attended today with a sworn
copy of an Affidavit of Documents?

MS. NUIC: The same answer applies that
they're FLA claimants, so it's the Affidavit of
Documents in Suzanne's name.

BY MR. COURTIS:

5 Q. And any documents that you may have in
relation to this matter you've given to your lawyer?

A. Yes.

6 Q. And you have produced all of those documents?

MS. NUIC: Yes. They're the text message screen shots that she has.

BY MR. COURTIS:

7 Q. Other than that, you don't have any other documents that are sort of relevant to this matter?

A. No.

MS. NUIC: And her out of -- I think I've produced something with respect to her income loss.

BY MR. COURTIS:

8 Q. If you become aware of any additional documents that are relevant to this lawsuit, will you let your lawyer know?

A. Yes.

9 Q. What did you do to prepare for the discovery today other than meet with your lawyer?

A. I'm sorry, I don't understand.

10 Q. Other than meeting with your lawyer, did you do anything to prepare for the discovery today? Did you review any documents?

A. No.

11 Q. Did you speak with anyone other than
your lawyer?

A. No.

12 Q. Did you keep a diary or a journal or a
calendar during the relevant time in which you would
have recorded anything about the procedure that Suzanne
underwent or any symptoms afterwards?

A. I did not, no.

13 Q. So you would have otherwise no sort of
handwritten or typed notes that Suzanne received?

A. No.

14 Q. Did you, other than what you have
already produced, correspond with any others about the
symptoms that she was experiencing or the care that she
was receiving?

A. Other than with my fiancé, but nobody
else other than outside of my fiancé.

15 Q. What's your date of birth?

A. May 13th, 1983.

16 Q. And where do you live?

A. In Stoney Creek, Ontario.

17 Q. What's your address?

A. It's 34 Athenia Drive, and that's in
Stoney Creek.

18 Q. And how long have you lived at that

address?

A. Since November 2013.

19 Q. And who do you currently live there
with?

A. With my mother, Suzanne, and with my
fiancé.

20 Q. What's your fiancé's full name?

A. Aaron Murphy.

21 Q. And do you have any children?

A. No.

22 Q. And how long have you and Aaron been
married?

A. We're not married. He's my fiancé.

23 Q. Did your mother live with you prior to
November 2013?

A. I lived with my mother.

24 Q. And how long did you live with her?

A. My entire life.

25 Q. So with respect to the procedure on
November 26, 2012, that's the basis of this action, did
you attend at the hospital that day?

A. I did, yes.

26 Q. Did you go with Suzanne?

A. With Suzanne, my aunt, and my uncle.

27 Q. And you all went together?

A. Yes.

28 Q. And prior to arriving at the hospital on that day, did Suzanne complain to you about having a bump on her head?

A. No.

29 Q. Did she complain about any headaches or dizziness?

A. No.

30 Q. And other than the concerns with her ovaries that the procedure was for the purpose of, did she have any other health concerns that she noted on that date?

A. No, she did not.

31 Q. So starting from the moment you arrived at the hospital, where did you go?

A. We went into I guess the operating where you go for the preop, and they bring you in, and they bring her in to dress in a gown and get ready for the operation.

32 Q. So did you check in with a desk first?

A. Yes.

33 Q. After Suzanne had checked in, did you sit in a waiting room at that point?

A. I don't remember.

34 Q. At some point, was Suzanne taken into I

guess another room?

A. We were taken into another room where she was changed and put into a bed.

35 Q. And there was curtains around?

A. Yes.

36 Q. She changed into a gown, and there was a bed there?

A. Yes.

37 Q. And how long would you estimate that you were there in that room?

A. I would say about 40 minutes.

38 Q. Do you recall any doctors coming in to talk to Suzanne during that time?

A. I don't remember the doctor. I do remember there was nurses that came in and prepped Suzanne.

39 Q. When you say came in and prepped her, what kinds of things?

A. They gave an IV, and I just remember them getting her ready, giving her the gown.

40 Q. The three of you were there the entire time with her?

A. Yes.

41 Q. At some point, somebody came and got her to bring her to the operating room?

A. Yes.

42 Q. Was it a nurse or a porter?

A. I don't remember.

43 Q. But when somebody came to get her, did they take the actual bed and wheel it out of the room?

A. I believe so. I don't remember the exact details of that.

44 Q. Do you recall I guess going with her down the hallway after she had left that curtained area?

A. Once she left that curtained area, that's what I remember her going in. Other than that, that's what I remember.

45 Q. At the last time you saw her, did she complain to you about having a bump on her head?

A. Not at all.

46 Q. Any headaches or dizziness?

A. No.

47 Q. Or any other health concerns?

A. No.

48 Q. Where did you wait while she was in the OR? Just in the waiting room.

A. There's an OR waiting room right outside.

49 Q. Do you recall speaking with anyone

immediately following the procedure?

A. Dr. Small came out after her procedure, and he told us her surgery had gone well, and he provided us with two images of her ovaries which I thought was neat to see, and as soon as I saw them, because they were so irregular, I actually sent a text message to my fiancé because I've never seen anything like that before, and he explained to us that she was going to be in the postop a little bit longer because they were trying to stabilize some oxygen levels.

50 Q. Did he ever tell you that her oxygen had dropped?

A. I just remember him stating that she was going to be in the postop a little bit longer so that they can just stabilize the oxygen levels.

51 Q. How long after were you able to go see Suzanne?

A. I don't remember the exact time frame. It might have been around 5:30. When we were waiting for her, we were told her room was up on the sixth floor, and we had went up there to check it out and to see her room, and we were told it was by a window like she wanted. We had discussed that before. We couldn't find her. After she came out of surgery and postop, we were sent on a little bit of a wild goose chase to try

and find where she was located.

52 Q. And I guess did you make inquiries of anyone?

A. My aunt did. I followed my aunt. My aunt was trying to find out where she was located.

53 Q. And eventually you were able to locate her?

A. Yes.

54 Q. How did that -- how eventually were you able to locate her?

A. She was up on the seventh floor I believe, and we came out of the elevator, and I could hear her just yelling, and so we just followed her yelling and came into the -- there was somebody who left the room, and we came into the room, and she was just screaming.

55 Q. Did anyone ever tell you that she was being transferred to a special oximetry bed?

A. No.

56 Q. So when you first went into the room, she was hollering?

A. Yes.

57 Q. In pain?

A. Yes.

58 Q. Was she saying anything else?

A. She was saying her head hurt, and she was really -- like, it was upsetting to see that. She was really upset with her head.

59 Q. I guess was a nurse around and aware of that?

A. There was a nurse that was there and saying, "Oh, she's hallucinating, and it's just the anesthetic."

My mom just kept on saying no, and she actually got mad and threw the pillow down at the bottom of the bed and said, "No, it's my head."

And when my aunt went to go see her like see her head, her head was all wet in the back.

60 Q. Did you have an opportunity to go see the back of her head?

A. I didn't. I was more trying to help her to calm down and to breathe because not only that, but she was on a special I guess oxygen level machine. They were still monitoring her oxygen levels, so I was just trying to calm her down.

61 Q. Did she tell you anything else sort of immediately when you got into the room about anything else she was experiencing other than pain in her head?

A. No, she just kept on complaining about the pain in her head.

62 Q. And I guess did the nurse give her
anything for that pain?

A. I don't remember right away. I do know
later on they were giving her something for the pain.
She was also saying she was a bit nauseated, and so
they were giving her something for nausea as well.

63 Q. Over the course of that evening, did
her pain seem to be getting better?

A. I don't remember.

64 Q. Around what time did you leave that
evening?

A. Probably about 8:30, 9:00.

65 Q. Did your fiancé stay with you?

A. He met us at the hospital probably
around 7:00 because he was at work that day.

66 Q. So he came in the morning and left to
go to work?

A. No, no, he was at work all day.

67 Q. So at any time during that evening, did
she note any other symptoms she was experiencing other
than the head pain?

A. She was nauseous.

68 Q. Did you go visit her the next day?

A. Yes.

69 Q. And what time? Would it have been in

the morning?

A. Right after work.

70 Q. After work?

A. Yes.

71 Q. And when you got there at that point,
was she any different from the day before?

A. She kept complaining about her head,
and she was feeling extremely nauseous.

72 Q. Any other symptoms she was complaining
about to you at that time?

A. She was just nauseous, and her head was
hurting.

73 Q. Did she mention anything to you about
any discussions she'd had about with any doctors or
residents that day before you had gotten there?

A. No.

74 Q. Did your aunt tell you that she had
filed a complaint with the hospital?

A. She didn't say that she filed a
complaint. She just told me that she was asking
doctors somebody to come in and take a look at her head
because of her complaining about her head.

75 Q. I guess at that point, were you
concerned that she may have hit her head or been
dropped during the procedure?

A. I didn't know what happened. I didn't know why her head was hurting.

76 Q. While you were there that evening, was she seen by any doctors or residents?

A. No.

77 Q. Around what time would you have left that evening?

A. Just after visiting hours, so probably around 9:00 again.

78 Q. Over the course of the remainder of her hospital stay, how did her symptoms change? Did her head pain get better, worse, or stay the same?

A. I don't remember the exact level of the pain. I just remember every time I would speak with her or see her she would tell me how much she was nauseated and her head hurt.

79 Q. I guess did you personally or did you see your aunt or Suzanne relay those concerns continuously to nursing staff or doctors during that period?

A. I would tell my mom to tell the nurse.

80 Q. And are you aware of at that point what they were sort of saying in response to those complaints?

A. I don't remember.

81 Q. Was she ever referred to a specialist
of any kind while she was in the hospital?

A. I don't remember.

82 Q. At any point in the days following the
procedure while she was in the hospital, were you
present for any visits by any physicians or residents?

A. No, I was not.

83 Q. Were you present for any conversations
where anyone or any medical staff discussed the reasons
for the bump on her head or what could have possibly
happened?

A. No, I was not.

84 Q. Would you have gone to see her every
day during that period?

A. Yes, I did.

85 Q. And at the time she was discharged on
December 1st, 2012, was she still experiencing the same
symptoms?

A. I was not with her that day. My aunt
picked her up. I coach competitive cheerleading, and I
was at a competition that weekend, but my aunt had
taken care of her during my absence.

86 Q. While she was in hospital, did you
notice any or I guess did you have the opportunity to
examine the back of her head at any point?

A. No, I did not.

87 Q. Did you note any stuttering at that point when she would speak to you?

A. I don't remember.

88 Q. Did you notice any I guess cognitive delays when she would speak to you, she would speak more slowly or be unable to remember anything that you can recall?

A. I don't recall.

89 Q. Did she continue to have nausea throughout?

A. Yes.

90 Q. Do you recall her complaining about abdominal pain while she was in the hospital?

A. No, and that's what I was surprised with. She didn't really complain about the incision where her stomach was. It was more about her head and how nauseous she felt.

91 Q. Do you recall any discussions why she was being kept for the five days after the procedure?

A. No, I don't.

92 Q. Do you recall any discussions about -- concerns about she wasn't passing gas or her bowel movements hadn't returned to regularity?

A. No.

93 Q. At the time she was discharged in light of the symptoms that she last expressed to you, were you concerned that she was being discharged with those ongoing symptoms?

A. I don't remember.

94 Q. How did her symptoms progress over December and January in the months after the procedure?

A. When she was home, we did notice like she was very dizzy. I would have to help her become -- like move around. We lived on a one-floor apartment, so I had to help her move around. She was unable to -- still unable to wash her hair. I was doing her hair for her. She started complaining about her vision being blurred. She was having a hard time reading anything with a smaller print. She was nauseous.

I would call her every single day from work and she would tell me -- I would always check in and say, "How are you doing?"

And every single day she would say that she had a headache and she was nauseated, and if she had to do too much movement, she would get dizzy.

95 Q. Do you recall the onset of stuttering during those few months?

A. Yes.

96 Q. Was it a gradual onset, or did you

notice it all of a sudden?

A. I just noticed it.

97 Q. Has it gotten worse in the three and a half years since?

A. To be honest, it's been so long that I've almost become accustomed to understanding her stuttering, so I don't remember if it's gotten worse or if it's gotten better.

98 Q. In the months following her discharge, did you attend doctors' appointments with her?

A. The odd one. I wasn't able to take too much time because of work.

99 Q. Did you attend any appointments with Dr. Small?

A. Not postop.

100 Q. But some preoperative?

A. Yes.

101 Q. As far as the symptoms that she continues to experience today that she's told you about, does she continue to experience headaches?

A. Yes.

102 Q. How about dizziness?

A. Yes.

103 Q. And nausea?

A. Yes.

104 Q. Difficulties with balance?

A. Yes. She's fallen actually quite a few times.

105 Q. How many times would you estimate she's fallen since?

A. I don't know an exact number, but she has fallen a few times.

106 Q. Have you had to take her to the hospital after she's had one of those falls?

A. Nothing has been severe. We've just relaxed and get her composure again.

107 Q. Have you noticed any ongoing cognitive delays, ability to recall things?

A. Yes.

108 Q. I guess could you describe those?

A. It's just frustrating. One thing with my mom I could tell her something and she would remember something instantly, and now when I'm talking to her, she -- I forget that she doesn't remember things, and it gets really frustrating.

109 Q. For both of you?

A. That's a daily basis, and I have to remember this is who she is now, and it's frustrating.

110 Q. Is she depressed and anxious now?

A. Yes.

111 Q. Is she increasingly frustrated and irritable as a result?

A. Yes.

112 Q. Now, prior to the procedure, was she generally in good health?

A. Yes. My goodness, she was one -- she's probably one of the hardest working people I know. She always worked two jobs. She was a single parent my entire life. She supported me. I was a competitive dancer, competitive cheerleader. She would go to all my competitions. She would sew my costumes. Like, she was so full of life.

113 Q. She's unable to do that?

A. No.

114 Q. Prior to the procedure, did she ever have persistent headaches or dizziness?

A. No.

115 Q. Did she ever complain of tension headaches?

A. Not that I remember.

116 Q. Do you remember any sort of ongoing depression and anxiety before the procedure?

A. No.

117 Q. Did you notice any change in her mood after she was terminated from Manpower in May of 2012?

A. She was upset, but she was the person that with one door closed another one would open, and I remember her looking for other positions right away.

118 Q. As far as her mood goes and any depression, she would have rebounded by November of that year?

A. Oh, absolutely.

119 Q. Prior to the procedure, did she have any issues sleeping?

A. No.

120 Q. Did she ever go to a sleep clinic or have a sleep study done that you're aware of?

A. Not before the surgery.

121 Q. But after the surgery she has?

A. Yes.

122 Q. So after the procedure, how has her ability to carry out the activities of her daily life changed? Specifically, I'll ask about a few. Is she able to wash her hair and bathe?

A. No. She bathes herself. I usually stay in the room with her in case there's any issues, but I wash her hair, and I do her hair for her now.

123 Q. And she asks you to wash her hair?

A. She gets dizzy. Like, when she does her hair and she has to put her head back, she gets

really dizzy.

124 Q. How often will you have to do that?

A. We do it maybe once every other week.

125 Q. Do you help her with any other grooming?

A. I do. Not the other grooming. Like, I'll do her waxing for her or stuff like that, but she can go to the bathroom herself, and she can physically wash herself. She can brush her own teeth.

126 Q. Can she brush her own hair?

A. I help her brush her hair.

127 Q. Is that because the area is still tender?

A. It's easier for me to help her to do her hair. She has a lot of hair.

128 Q. Does she still prepare meals at all?

A. No.

129 Q. Is she able to prepare sort of basic snacks that don't require a stove?

A. Toast. What I've done is I prepare any meals that have to be on the stove or in the oven, and then the microwave we actually have it labelled out of where to push so that she's aware of what to do if I'm not home.

130 Q. So who prepares the majority of the

meals?

A. I do.

131 Q. And before the procedure, who prepared
the majority of the meals?

A. She did.

132 Q. I guess beforehand how many would you
have prepared on a percentage basis, or would she have
done almost all of them?

A. Maybe once a week. I have a really
busy schedule, and between work and when I coached, I
was out almost every night of the week.

133 Q. And before the procedure, she was able
to wash her own hair and brush her own hair?

A. Yes.

134 Q. What sort of household chores is she
able to do now after the procedure?

A. She's able to keep her area clean, but
I do all of the vacuuming. I clean all our bathrooms.
My fiancé and I do all the housework and all the
outside work as well.

135 Q. Is she able to do the laundry?

A. I help her out with that as well. She
can fold her laundry, but when it comes to the buttons,
I help with selecting the wash and the dryer mode.

136 Q. I guess she's unable to carry the

laundry bucket?

A. Yes, I help her with that.

137 Q. And before the procedure, who would do
the majority of the household chores?

A. They were split.

138 Q. Who would do the laundry?

A. We did our own.

139 Q. And now all her laundry you have to
help assist her doing it other than the folding part?

A. Yes.

140 Q. How long after or I guess I'll ask
first did you notice her lose hair in that spot after
the procedure?

A. I noticed it in December. A couple of
weeks after the surgery I was doing her hair for her,
and that's when I noticed she had the bald spot in her
hair. She was complaining actually that it felt like
bugs. She's like, "I don't know what's in my hair,"
and she felt it, and that's when I spread her hair
apart, and that's when I noticed the bald spot.

141 Q. Did she ever have any oozing or any
like liquid coming out of that bump on the head?

A. No, there was no -- there was just a
bald spot.

142 Q. How long after the procedure did it

take for the bump to go away?

A. I didn't notice.

143

Q. I'm just going to ask a few brief questions about the damages you've claimed. So you have claimed for out-of-pocket expenses. If you could talk a bit about those. What sort of things or expenses have you incurred on her behalf?

A. Now that she's unable to work I cover the majority of the groceries and our bills and gas taking her to appointments or if we need to go out for any reason.

144

Q. What percentage of the household expenses would she generally cover from the income that she gets?

A. I don't understand.

MS. NUIC: She's getting ODSP and CPP now.

THE DEPONENT: Yes.

MS. NUIC: What does she contribute to the household? Does she pay a certain bill?

THE DEPONENT: Yes, she pays us rent.

BY MR. COURTIS:

145

Q. And how much does she pay you?

A. 600.

146

Q. And are you renting the place?

A. No, we own it.

147 Q. Does she pay for any other specific bills every month?

A. No.

148 Q. Does she otherwise contribute to groceries or other things you may buy for the household?

A. Not usually. Sometimes she does.

149 Q. If you were to put I guess a percentage of the total household expenses that she would help out with, what would you estimate that as?

A. To be honest, I'm not too sure. I know we cover the majority of it. We take the money that she gives us, and we divide it amongst our own bills of paying for the house and paying for groceries and hydro and phone.

150 Q. Does she take care of her own finances?

A. I help her with that.

151 Q. How long have you been helping her with her finances?

A. Since the injury.

152 Q. Other than I guess household expenses, you mentioned the travel expenses going to appointments or just generally going out?

A. It could be just going to a grocery

store. When she's having a good day, we try to go to a grocery store or try to get her out of the house because she never wants to leave the house anymore.

153 Q. And other than those expenses, do you have any other out-of-pockets that you can think of at this point?

A. No.

154 Q. Can I have an undertaking for any records supporting any out-of-pocket expense claims?

U/T MS. NUIC: Yes.

BY MR. COURTIS:

155 Q. You also claim a reasonable allowance for travel expenses visiting her during her treatment and recovery. How often I guess in the months after the procedure -- I guess you wouldn't have to visit her because you lived together?

A. Yes.

156 Q. How often would you take her to appointments in the years since?

A. To be honest, I don't remember. I just do them.

157 Q. Would it be one a week, one a month, a few times a month just on average?

A. I don't remember.

158 Q. Would you usually be the one who is

taking her to appointments?

A. My aunt usually does because they're during the day and I'm at work, but if there's any days that she's unable to make it, that's where I would step in and I would take her to appointments.

159 Q. You also claim for a reasonable allowance for nursing, housekeeping, and other services. Can you talk specifically about the nursing care that you provided Suzanne?

A. Can you explain?

160 Q. Just after the procedure, did you provide any I guess nursing care to her, you know, changing any dressings that there may have been or helping her out in that sort of medical capacity while she was at home?

A. There was a nursing company that came in and would do her bandages for her.

161 Q. And are there any -- other than what we've talked about already helping her groom and otherwise, are there any other sort of nursing or other services that you can think of that you provided to her?

A. No. It was just her daily life. Like, I've been helping her with her daily chores and her grooming and cooking.

162 Q. So who would do the majority of the
chores around the household between you and your
fiancé?

A. We both share them. I do all of the
cooking. He doesn't cook.

163 Q. Prior to the procedure, you were living
with her?

A. Yes.

164 Q. And what would be the split of
housekeeping?

MS. NUIC: She indicated previously
they would split the chores.

THE DEPONENT: Yes.

BY MR. COURTIS:

165 Q. To the extent it's not captured in the
previous undertaking, can we have any records for
nursing, housekeeping, or any of the travel expenses
that are being claimed?

MS. NUIC: As I've indicated, the
nursing and all that is part of the loss of care,
guidance, and companionship and what she's given to her
mother and the new role she's had to take on as a
responsibility, so her mother is not paying for these
duties, so it's not --

MR. COURTIS: So the pleading for that

nursing, housekeeping, and other services is subsumed in the loss of care?

MS. NUIC: Yes, because ultimately it's a role reversal.

MR. COURTIS: Are you advancing a loss of income claim?

MS. NUIC: There's a couple of days that she lost income as a result.

BY MR. COURTIS:

166 Q. How many days would you estimate that you've lost having to help her out as a result of the procedure?

A. I don't have an exact number, but I sent you the documents.

U/T MS. NUIC: Yes, you did. I will send that. I realize it's not in the Affidavit of Documents, but I'll send that over to you. I believe I have sent it, but it's just not in the Affidavit of Documents.

MR. COURTIS: I guess does said document set out the sort of quantity that's being claimed for that day?

MS. NUIC: Yes.

BY MR. COURTIS:

167 Q. And for those days, to the extent you

can recall, what was the reason for those? She had an appointment?

A. Some were appointments, and some were if she wasn't having a good day, I would stay home and stay with her to make sure she was okay.

168 Q. Did you ever have to skip work while she was in hospital?

A. I took the day off for her surgery.

169 Q. And other than those few days that we'll get the document on, is there any other loss of income that you're claiming?

A. No.

170 Q. What was your relationship like with your mother prior to the procedure?

A. She's my best friend. I'm an only child, and she's a single mom, and she's my best friend.

171 Q. What kinds of things would you enjoy doing together?

A. We would go to concerts. We would go shopping. We would go out and just hang out, just movies, dinners.

172 Q. And you felt comfortable confiding in her?

A. Absolutely.

173

Q. And how did this change after the procedure?

A. She's no longer my -- it feels like I'm her mom and I'm the one taking care of her, whereas before I was able to go to her for things, and now the roles have reversed. I didn't think that I would be in my 30s and having to do this. I expected this to happen when she was older, but I didn't expect that it was going to happen now like have her living with me and having to take care of her. Like, I call her every day to make sure she takes her medication. Have you done this? How are you feeling today? It's a lot.

174

Q. Sure. Do you still ever go to concerts or movies together?

A. No.

175

Q. Do you ever go out for dinners together?

A. Whenever she's feeling okay, we'll go not clothing shopping. I'll take her to the grocery store, but we don't go out as much as what we used to. We used to go out all the time.

176

Q. And now how often would you go out not for an errand and just to go out to someplace that you enjoy?

A. Not very frequently.

177 Q. So that would be less than once a
month?

A. About that.

178 Q. Does she regularly attend family
gatherings still?

A. No.

179 Q. Do you find she has to be coaxed out of
the house?

A. Yes.

180 Q. Does she regularly attend social
gatherings anymore -- prior to the procedure, did she
regularly attend family gatherings and social
gatherings?

A. Yes.

181 Q. Does she still attend church?

A. The odd time.

182 Q. And prior to the procedure, would you
go to church with her?

A. I did not go to church with her.

183 Q. How often would she attend?

A. She would go on a weekly basis.

184 Q. Do you find you're unable to confide in
her as much after the procedure?

A. It's not so much confiding. It's just
hard to discuss things with her because she forgets,

and it gets frustrating. I get frustrated easily, and I see that she gets frustrating, so I don't tell her as much, and she worries about things, and so I try to keep things -- I don't want to tell her things because I don't want her to worry or get upset.

185 Q. Have you had to make any modifications to the house to account for her symptoms?

A. Just when we were looking for a house, we made sure that we had everything like the majority of everything on the main floor. So we have a bathroom on the main floor. The kitchen is on the main floor, and so she has a good living area on the main floor.

186 Q. And she lives on the main floor?

A. She stays most of the day on the main floor, but her bedroom is upstairs.

187 Q. Is she able to climb the stairs by herself?

A. Like, I walk behind her usually.

188 Q. If you have any further memory regarding any of the questions I've asked you, can you please tell your lawyer right away and have her convey that to me?

A. Yes.

MR. COURTIS: And subject to questions which may arise out of answers to undertakings, under

advisements, and refusals, those are my questions.

MR. BULLIVANT: Thanks, Ms. Young. I don't have any questions.

EXAMINATION BY MR. MURTHA:

189 Q. Just one question for me, ma'am. I think I already anticipate the answer. I'm on for two doctors who were residents at the time, and our understanding at this time is they were in the operating room at the time, and it doesn't seem like they had any formal interaction with your mother or any members of your family afterwards. I just want to confirm whether you recall ever having any interaction with Anna Dul or Nicholas Afagh.

A. No.

MR. MURTHA: Thank you.

-- EXAMINATION CONCLUDED AT 3:10 P.M.

I hereby certify the foregoing to be the evidence of CARI-ANN YOUNG, a Plaintiff herein, given under oath before me on the 21st day of June, 2016, recorded verbatim and later transcribed by me.

CATHERINE DOARY

COURT REPORTER

COMMISSIONER OF OATHS (Expires March 18, 2018)

Photostatic copies of this transcript are not certified and have not been paid for unless they bear the original signature of Catherine Doary; and accordingly are in direct violation of Ontario Regulation 587/91, Courts of Justice Act, January 1, 1990.