

1 told you that she had glare or halos before you were
2 going to operating?

3 A. So that she knew what I meant when I said that
4 you could have glare and halo problems, that was the
5 significance. Some people say, I have no idea what
6 you're talking about, I've never even seen anything
7 like that.

8 Q. Okay.

9 A. And then I have to explain what those terms mean.
10 So I ask people whether they're familiar with those
11 terms.

12 Q. Okay.

13 A. And with that visual experience.

14 Q. Did you document anywhere that the patient said
15 she had problems with glare or halos prior to the
16 surgery?

17 A. No.

18 Q. Okay. Now, did you document anywhere that she
19 had problems with star burst prior to the surgery?

20 A. No.

21 Q. Did she tell you she had problem with star burst
22 before surgery?

23 A. I don't recall.

24 Q. Do you have anything that tells you she did have

1 problems with star burst before the surgery?

2 MS. NEWMAN: In other words, anything
3 other than the medical records, and she
4 said, no.

5 MR. KAFRISSEN: I'm talking about
6 anything. So the prior medical records,
7 she referenced the questionnaire, the
8 patient's questionnaire that type of thing.

9 THE WITNESS: No.

10 BY MR. KAFRISSEN:

11 Q. Do you have any record that she had double vision
12 prior to the surgery in her right eye?

13 A. No.

14 Q. You did a number of examinations before March 20,
15 1997, lasik on the right eye; is that correct?

16 A. Yes.

17 Q. If you were examining a patient and the patient
18 said, you know, I'm seeing double, is that something
19 that you would consider a significant finding?

20 A. Yes.

21 Q. Is that something that you would document in your
22 chart?

23 A. I would question the patient as to what he meant
24 by double.

1 MS. NEWMAN: Would you document in
2 the chart that a patient complained of
3 double vision?

4 THE WITNESS: Yes.

5 BY MR. KAFRISSEN:

6 Q. Am I correct that there is no documentation in
7 your chart prior to the March 20 surgery, that there
8 were any complaints of double vision?

9 A. Yes.

10 Q. I know we had organized a number of letters you
11 had written to Dr. Scenerino, I was asking you a
12 question about the letters so let me do that. Your
13 first letter to Dr. Scenerino, when was that?

14 A. February 18.

15 MS. NEWMAN: I think I saw
16 February 9.

17 THE WITNESS: For Dr. Scenerino?

18 BY MR. KAFRISSEN:

19 Q. Is there a February 10 letter?

20 MS. NEWMAN: No, there is not, I'm
21 sorry, there is no February 10 letter to
22 Dr. Scenerino.

23 THE WITNESS: There is a visit
24 February 10, but not a letter.

1 BY MR. KAFRISSEN:

2 Q. There's a letter -- I'm sorry, there is a
3 Personal Choice letter on February 10.

4 A. Right.

5 Q. Did you authorize a letter February 10, 1997, to
6 Blue Cross Personal Choice?

7 A. Yes.

8 Q. Why were you writing to Blue Cross Personal
9 Choice?

10 A. At Ms. Fiorelli's request. She wanted to see if
11 her insurance might cover her surgery. She asked me to
12 write to them and I said, I would.

13 Q. Do you know whether they did cover her surgery?

14 A. No, I don't know.

15 (Whereupon Exhibit Nevyas-Wallace 4
16 was marked for identification.)

17 MS. NEWMAN: Off the record.

18 (A discussion was held off the
19 record.)

20 BY MR. KAFRISSEN:

21 Q. The bill that I have that was furnished is a five
22 page bill, would you take look at that.

23 A. It looks like she paid for surgery --

24 MS. NEWMAN: Wait for a question.