

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

TINA SPENCER-SMITH,

Plaintiff,

v.

VOLUNTEER RESTAURANT ASSOCIATES,
INC. d/b/a CAFÉ 290 and NEWBURGER-ANDES
& CO.,

Defendants.

Civil Action No. 17EV000950

PROPOSED CONSOLIDATED PRE-TRIAL ORDER

The following constitutes the parties' Consolidated Pretrial Order for the above-styled case:

- (1) The name, address and phone number of the attorneys who will conduct the trial are:

Plaintiff: Anthony Jones
Bruce Millar
MILLAR & MIXON, LLC
108 Williamson Mill Road
Jonesboro, Georgia 30236
(770) 477-6360

Defendants: Brantley C. Rowlen
Kate Cappelmann
LEWIS BRISBOIS BISGAARD & SMITH LLP
1180 Peachtree Street, NE
Suite 2900
Atlanta, Georgia 30309
(404) 348-8585

- (2) The estimated time required for trial is: 4-5 days
- (3) There are no motions or other matters pending for consideration by the Court except as follows:

a. By the Plaintiff: Plaintiff reserves the right to file any motions in limine or other evidentiary motions before or during trial, as evidentiary issues arise. Plaintiff also reserves the right to file motions to compel non-parties to produce documents to which requests for production of documents or open records act requests were properly served.

b. By the Defendant: Defendant's motions in *limine*.

(4) The jury will be qualified as to any relationship with the following:

a. By the Plaintiff:

1) Bruce R. Millar, Anthony R. Jones II, and all members of The Millar Law Firm.

2) The Plaintiff shows that it is well settled that jurors must be qualified as to their interest and relationship to Hudson Specialty Insurance Company. O.C.G.A. §15-12-135. This applies whether the carrier is a stock company, Dalton v. Vo, 230 Ga. App. 413 (1998), citing Atlanta Coach Co. v. Cobb, 178 Ga. 544, 549 S.E. 131 (1934) (Court is required to purge jury panel of employees, stock holders, and relations of stock holders of Defendant's liability insurer), or a mutual company, Weatherbee v. Hutchenson, 114 Ga. App. 761, 152 S.E.2d 715 (1966). (If insurance company having potential financial interest in outcome of case is mutual company, in assets of which policy holders had interest, policyholders are disqualified from jury service.) It is reversible error not to do so. Stevens v. Wright Contracting Co., 92 Ga. App. 373, 88 S.E.2d 511 (1955). Qualifying the Jury as to the defendant's insurance company is normally done by the Court, but it is within the sound discretion of the Trial Court to allow the Plaintiff to perform insurance qualification or to allow additional follow up by Plaintiff's Counsel regarding insurance during panel or individual *voir dire*. See Parsons v. Harrison, 133 Ga. App. 280 (1974)(After the Court had

qualified Jurors as to Georgia Mutual Insurance Company, it was not error for the Court to allow Plaintiff's Counsel to ask whether any juror had ever been an agent or employee of Georgia Mutual, or if any juror has ever worked for any insurance company").

b. By the Defendant:

1) Tina Spencer-Smith, Plaintiff;

2) Volunteer Restaurant Associates, Inc. d/b/a Café 290 and any of its past or present employees, agents, officers, shareholders, directors, subsidiaries, parents or affiliates;

3) Newburger-Andes & Company and any of its past or present employees, agents, officers, shareholders, directors, subsidiaries, parents or affiliates;

4) The law firm of Millar & Mixon, LLC and counsel Anthony Jones and Bruce Millar;

5) The law firm of Lewis Brisbois Bisgaard & Smith, LLP and counsel Brantley C. Rowlen and Kate Cappelmann;

6) Peachtree Orthopedic Clinic and any of its past or present employees, agents, officers, shareholders, directors, subsidiaries, parents or affiliates;

7) Defendants object to the jury being qualified as to Hudson Insurance Group.

It is only proper to qualify jurors as to whether they are policy holders or related within the prohibited degree to policyholders when the insurance company is a mutual or when it does not appear whether or not it is a mutual. Weatherbee v. Hutcheson, 114 Ga. App. 761, 765 (1966). If the insurance company is a stock company, such an inquiry is irrelevant as "the policyholder has nothing more than a contract with the company, giving him no interest in its assets, and he is no more disqualified than would be a depositor in a bank that is a party to a litigation." Id. Hudson Insurance Group is not a mutual insurance company and, therefore,

no juror will have a financial interest in the outcome of this suit. Because a policyholder relationship will not disqualify a juror, inquiry into such matters in the presence of the jury would only serve to cause prejudice or harm to Defendants of which no probative value to Plaintiff is outweighed.

(5) a. All discovery has been completed, unless otherwise noted, and the Court will not consider any further motions to compel discovery except for good cause shown. The parties, however, will be permitted to take depositions of any person(s) for the preservation of evidence for use at trial. Plaintiff and Defendant reserve the right to insist upon the appropriate supplementation of discovery as required by the Georgia Civil Practice Act, O.C.G.A. § 9-11-26(e).

By the Plaintiff: The parties reserve the right to take a discovery deposition of any witness identified in supplemental responses to discovery as either a fact or expert witness and to view any evidence identified by supplemental discovery responses.

The parties reserve the right to take the deposition of the opposing party's "will call" or "may call" witnesses, said depositions not to delay the trial of the case. Additionally, the parties reserve the right to insist upon the appropriate supplementation as required by §26(e) of the Georgia Civil Practice Act, O.C.G.A. §9-11-26(e). The parties reserve the right to continue discovery to the extent that it will not delay trial and reserve the right to request supplementation of prior discovery responses herein.

By the Defendants: Defendants reserve the right to take depositions of any witnesses not previously identified and allowed to testify by the Court. In the event any witnesses, known or unknown, are unavailable for trial, Defendant would

proceed to take those depositions as well. Defendants reserve the right to depose any “will call” or “may call” witnesses listed by Plaintiff.

b. Unless otherwise noted, the names of the parties as shown in the caption to this Order are correct and complete and there is no question by any party as to the misjoinder or non-joinder of any parties.

By the Plaintiff: None.

By the Defendants: None

(6) The following is the Plaintiff’s brief and succinct outline of the case and contentions:

At approximately 9:15 PM on April 15, 2013, Ms. Tina Spencer-Smith and her friend, Sheryl Chinn, went to a jazz club by the name of Café 290, located at 290 Hilderbrand Rd., Atlanta, Fulton County, Georgia 30328. Ms. Chinn had previously made reservations for a table. As they entered the club, they stopped at the first hostess stand, which was located by the door, in order to pay their entry fee. The first hostess then directed them to another Café 290 employee, named Monica White, who was to show them to their reserved table. They gave Monica White their names, and instead of escorting them to their table, she pointed them to the general area where their table was located.

The two ladies then turned to locate the name card with Sheryl’s name on it, with Tina walking slightly ahead of Sheryl. The tables were high tables and bar stools were used as chairs. The area was being lit with small candles on the tables in order to create a darker environment. Their table was positioned directly beside some steps that were the exact same color as the maroon colored carpet, making the steps extremely difficult to see in the dark. The lamp that was supposed to illuminate the steps had been covered up by a concert poster. Tina went to take her seat on the opposite side of the table. As she pulled her chair out, she took a step back with her left leg and hit

something. She attempted to stabilize herself with her right leg, but her right leg then hit the same thing and she fell to the ground, striking her right hip and other parts of her body. It was only after she fell that she realized she had hit some steps that were located there. Tina immediately felt pain in her right hip and right knee.

After her fall, Tina attempted to stay but could not take the increasing pain. After about ten minutes, she asked to speak to a manager, and was told by the hostess in charge that the manager would not be in until midnight. At that time, one of the hostesses told her that she was not the first person to fall on those steps and she wouldn't be last. Tina left Café 290 and had Sheryl drive her to the emergency room at Northside Hospital for treatment.

At Northside Hospital, Ms. Spencer-Smith made complaints of right hip pain and right knee pain. Abrasions were observed on her right hip and right knee. Over the next few days, the pain in her hip continuously increased, and she started experiencing soreness and pain in her right foot. She sought medical treatment with Dr. Daren Newfield of Newfield Orthopaedics, who put her on a course of treatment that included supervised physical therapy two-three times a week for six weeks.

On May 19, 2015, Ms. Spencer-Smith went to see her primary care physician, Dr. Frieda Millhouse-Jones, at Laureate Medical Group, with complaints of continued right leg pain and increasing lower back pain. She was diagnosed with lower back strain and Piriformis syndrome secondary to the fall. Physical therapy for her lower back was added to her physical therapy plan of care. On July 6, 2015, Ms. Spencer-Smith had an MRI of her lower back performed at Northside Hospital, which showed disc desiccation and an annular disc bulge at her L5-S1.

In the Fall of 2015, Ms. Spencer-Smith went for an evaluation for hip pain with Dr. John Henry and an evaluation for lower back pain with Dr. Shevin Pollydore, both at Peachtree Orthopaedic Clinic. She complained of continued right hip and thigh pain, as well as lower back

pain and right knee pain. Diagnostic testing was performed, and she was referred for additional physical therapy for her hip and lower back. Over the next two and a half years, she continued to treat at Peachtree Orthopaedic Clinic, seeing Dr. John Henry for her what was thought to be hip bursitis and Dr. Shevin Pollydore for her back pain and lumbar disc herniation. During that time, she received multiple painful steroid injections into her right hip and lower back. Thinking that he may need to send Ms. Spencer-Smith for a second opinion, Dr. John Henry referred her to another orthopaedic surgeon who specializes in hip injuries, named Dr. Dominic Carreira. On April 24, 2018, Ms. Spencer-Smith began treating with Dr. Carreira for her continued right hip pain. By June 2018, Dr. Carreira diagnosed a labral tear as the source of her hip pain, and he performed a surgical repair on July 17, 2018.

Plaintiff contends that Defendants' negligent conduct proximately caused the fall and injuries suffered by Plaintiff, thereby making Defendants liable for all of Plaintiff's medical bills totaling \$156,944.32, as well as her pain and suffering (See Para. 11, below).

(7) The following is the Defendants' brief and succinct outline of the case and contentions:

This case arises out of an alleged trip and fall occurring on Defendants' premises, better known as Café 290, on April 25, 2015, (hereinafter "the Incident"). Café 290 is a nightclub and restaurant offering food, full-service bar, and live music. On the evening of the Incident, Plaintiff arrived at Café 290 with a friend, paid the cover charge at the door, and checked in with the reservation host, Monica White. Ms. White then showed Plaintiff and her friend to their table and advised Plaintiff to watch out for the step beside their table. The path Plaintiff traveled to get to the table led her directly to the step Plaintiff alleges she tripped on. The steps lead to a door which opens out onto the sidewalk, and which has an illuminated "EXIT" sign hanging in front of it. The

steps are illuminated by a floor light to the right of the stairs when facing the steps, and by a spot light mounted to the ceiling.

Ms. White left Plaintiff and her friend at their table. When Plaintiff pulled her seat out she stepped backwards without looking where she placed her feet, and fell onto the steps. Though Plaintiff had been instructed to be aware of the step, and though the steps were noticeable to a person exercising reasonable care for their own safety, Plaintiff assumed the risk of falling by not paying attention to her surroundings and failing to exercise reasonable care in avoiding the step.

Plaintiff alleges Defendants were negligent in breaching their duty to Plaintiff by failing to maintain the premises in a reasonably safe and proper condition, specifically by not providing adequate light in the area where Plaintiff allegedly fell. However, Plaintiff had been to other night clubs and jazz clubs before, and was therefore aware nightclubs, especially those featuring live music, typically use lower lighting. The steps were appropriately lit by two different sources of light. The steps were in an open and obvious location readily visible and noticeable, despite low light, due to their open and obvious nature. Lastly, Plaintiff was specifically told by a Café 290 employee the step was there. Therefore, Plaintiff's injuries were proximately caused by her own failure to exercise reasonable care to avoid the step, and Defendants are not liable. Additionally, Plaintiff claims injuries that are wholly unrelated to her alleged fall.

(8) Issues for determination by the jury are as follows:

By the Plaintiff:

- (a) Negligence;
- (b) Special damages;
- (c) General damages; and
- (d) Proximate cause.

By the Defendants:

- a. Whether the step constituted a hazardous condition;
 - b. Whether the lighting in the nightclub constituted a hazardous condition;
 - c. Whether Plaintiff had equal or superior knowledge of any hazardous condition;
 - d. Whether Defendant has superior knowledge of any hazardous condition;
 - e. Whether Plaintiff assumed the risk by voluntarily encountering any alleged hazardous condition;
 - f. Whether Defendant breached the duty to keep its premises safe;
 - g. Whether Defendant's alleged breach of duty proximately caused Plaintiff's injuries;
- (9) Specifications of negligence including applicable code sections include the following:

By the Plaintiff:

Negligence:

- a. Defendants were negligent for violating O.C.G.A. §51-1-2, liability for ordinary negligence.
- b. Defendants failed to maintain its property in a safe and reasonable manner, at all times relevant to this action O.C.G.A. §51-3-1.
- c. Defendants failed to keep the premises and approaches safe to invitees, pursuant to O.C.G.A. §51-3-1.
- d. Defendants failed to properly train employees, at all times relevant to this action O.C.G.A. §51-2-2.
- e. Defendant was negligent for violating O.C.G.A. §51-2-2, liability for torts of employees.

By the Defendants:

- a. O.C.G.A. § 51-12-33: Reduction and apportionment of award or bar of recovery according to percentage of fault of parties and nonparties.

(10) If the case is based on a contract, either oral or written, the terms of the contract are as follows:

Not applicable

(11) The types of damages and the applicable measure of damages are as follows:

By the Plaintiff:

- a. Special Damages for past medical expenses in the amount of at least \$156,944.32; Plaintiff provided itemized medical bills to Defendant in the amount of Benchmark \$43,507.00; Atlanta COD Emergency Physicians \$1,346.00; Chung Acupuncture \$2,755.00; Laureate Medical Group \$320.00; Newfield Orthopedic \$760.00; Northside Emergency Associates \$842.00; Northside Hospital \$27,499.00; Peachtree Neurological Clinic \$900.00; Peachtree Orthopedic Clinic \$67,867.82; Piedmont Fayette Hospital \$2,863.00; and Southern Regional Medical Clinic \$8,284.50. Plaintiff objects to any claim by Defendants that medical expenses totaling \$156,944.32 have not been provided.

- b. General Damages for past, present and future pain and suffering in an amount to be determined by a fair and impartial jury.

By the Defendants:

Defendants do not seek damages

Defendants object to any suggestion or references to lost wages or loss of future earnings. As further discussed in Defendants Motion in *limine*, Plaintiff cannot verify with any degree of reasonable certainty a specific amount of wages lost due to the alleged incident. Since Plaintiff cannot prove her lost wages or loss of future earnings beyond mere

speculation, she should be precluded from presenting evidence of lost wages or loss of future earnings. Claxton v. Lee, 229 Ga. App. 357 (1997).

(12) If the case involves divorce each party shall present to the court at the pre-trial conference the affidavits as required by Rule 24.2: Not applicable.

(13) The following facts are stipulated: None at this time.

(14) The following is a list of all documentary and physical evidence that will be tendered at the trial by the Plaintiff or Defendants. Unless noted, the parties have stipulated as to the authenticity of the documents listed and the exhibits listed may be admitted without further proof of authenticity.

All exhibits shall be marked by counsel prior to trial so as not to delay the trial before the jury.

By the Plaintiff: See Attachment A-1.

a. Plaintiff reserves the right to amend and supplement this list prior to trial and Plaintiff reserves the right to object to the proposed documentary and/or physical evidence to be presented by the Defendants until Plaintiff's counsel has had an opportunity to examine such evidence, and until such evidence has been properly tendered.

b. NOTE: Plaintiff reserves the right to object to the introduction of any documents by the defendant that do not comply with the requirements set for by the Georgia Rules of Evidence.

c. NOTE: Plaintiff also objects to the introduction of any learned treatises and medical articles that have been prepared by experts but have not been provided to the plaintiffs during discovery. Plaintiff further objects to the introduction of these materials to the extent that they do not comply with the Georgia Rules of Evidence.

NOTE: Plaintiff also objects to the admissibility of any of Plaintiff's criminal history as introduction of such evidence would be inadmissible character evidence.

NOTE: Plaintiff also objects to the admissibility of any employment records of Plaintiff that Defendant intends to tender at trial that have not been disclosed to Plaintiff.

By the Defendants: See Attachment A-2.

a. Defendants do not stipulate to the admissibility of any documents listed in this Pre-Trial Order and reserve the right to object to the admissibility of any documents, including documents listed in the Pre-Trial Order.

b. Defendants reserve the right to supplement this list up to and including trial.

c. Defendants reserve their objections to Plaintiff's exhibits. Defendants reserve the right to utilize and introduce additional documentary evidence should same be determined relevant.

d. Lastly, Defendants reserve the right to utilize and introduce documentary and physical evidence for impeachment and credibility purposes.

(15) Special authorities relied upon by Plaintiff relating to peculiar evidentiary or other legal questions are as follows: None at this time. Plaintiff reserves the right to file motions in *Limine* and/or other briefs.

(16) Special authorities relied upon by Defendants relating to peculiar evidentiary or other legal questions are as follows: None at this time other than those listed in Defendant's Motions in *Limine*. Defendants reserve the right to file trial memoranda or briefs on particular legal issues if the same become relevant.

(17) All requests to charge anticipated at the time of trial will be filed in accordance with Rule 10.3.

The parties reserve the right to file additional requests to charge as the evidence may dictate through the course of the trial.

(18) The testimony of the following persons may be introduced by deposition:

By the Plaintiff:

- a. Any of Plaintiff's treating physicians, therapists, or other medical professions; including but not limited to Dr. Shevin Pollydore, Dr. John Henry, and Dr. Dominic Carreira.
- b. Any person who has been deposed and is unable to attend the trial due to a legally sufficient reason.
- c. Plaintiff objects to Defendant's introduction of witness testimony by deposition of witnesses who have not been shown to be legally unavailable to testify at trial. Plaintiff reserves the right to depose any witness listed by Defendant.

By the Defendant: Dr. Shevin Pollydore, Dr. John Henry, and Dr. Dominic Carreira.

Any objection to the depositions or questions or arguments in depositions shall be called to the attention of the court prior to trial.

(19) The following are lists of witnesses the:

a. **Plaintiff will** have present:

1. Tina Spencer-Smith

b. **Plaintiff may** have present:

1. Any of Plaintiff's treating physicians, therapists, or other medical professionals;
2. Any witness listed by the Defendant;
3. Any witness necessary for purposes of impeachment or rebuttal;
4. Sheryl Chinn;

5. Tamika Johnson;
6. Jerome Aiken;
7. Ashley Smith;
8. Stephanie Janelle Scott;
9. Keith A. Spencer;
10. Robin C. White;
11. Jane Jelks Jones;
12. Valda Gibson-Bates, M.D.

c. **Defendant will** have present at trial:

1. John Scatena

d. **Defendant may** have present at trial:

1. Dr. Keith Osborn
2. Monica White

The parties reserve the right to supplement and/or amend this portion of the Pretrial Order with proper notice to the Court and the parties.

Opposing counsel may rely on representation by the designated party that he will have a witness present unless notice to the contrary is given in sufficient time prior to trial to allow the other party to subpoena the witness or obtain his testimony by other means.

(20) The form of all possible verdicts to be considered by the jury are as follows:

(1) By the Plaintiff:

We, the jury, find for the Plaintiff in the amount of _____

Or

We, the jury, find for the Defendants.

(2) By the Defendants: Defendants request they be allowed to submit their proposed verdict form at the close of all evidence.

- (21) (a) The possibilities of settling the case are: Fair.
(b) The Defendant wants the case reported.
(c) The cost of take-down will be shared by the Parties.
(d) Other matters: None.

This 15th day of January, 2019.

MILLAR & MIXON, LLC

108 Williamson Mill Road
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(770) 477-6360

/s/ ANTHONY R. JONES, II
Anthony R. Jones, II
Georgia Bar No. 562715
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Attorneys for Defendants

IN THE STATE COURT OF FULTON COUNTY
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TINA SPENCER-SMITH,

Plaintiff,

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VOLUNTEER RESTAURANT ASSOCIATES,
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Defendants.

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It is hereby ordered that the foregoing, including the attachments thereto, constitutes the PRE-TRIAL ORDER in the above case and supersedes the pleadings which may not be further amended except by order of the court to prevent manifest injustice.

This 15th day of January 2019.



Hon. Diane E. Bessen
Chief Judge, State Court of Fulton County

CERTIFICATE OF SERVICE

The undersigned certifies that on this date Proposed Consolidated Pretrial Order was served upon counsel for Defendant via email and by mailing a copy of same to said counsel, to wit:

Brantley C. Rowlen
Kate Cappelmann
LEWIS BRISBOIS BISGAARD & SMITH LLP
1180 Peachtree Street, NE
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(404) 348-8585
(404) 467-8845 Facsimile
Brantley.Rowlen@lewisbrisbois.com
Kate.Cappelmann@lewisbrisbois.com

This 15th day of January, 2019.

MILLAR & MIXON, LLC

108 Williamson Mill Road
Jonesboro, Georgia 30236
(770) 477-6360

/s/ ANTHONY R. JONES, II
Anthony R. Jones, II
Georgia Bar No. 562715
Bruce R. Millar
Georgia Bar No. 505980
Attorneys for Plaintiff

ATTACHMENT A-1

Plaintiff's Exhibit List

1. Plaintiff's medical bills from Northside Hospital;
2. Plaintiff's medical records from Northside Hospital;
3. Plaintiff's medical bills from Northside Emergency Associates;
4. Plaintiff's medical records from Northside Emergency Associates;
5. Plaintiff's medical bills from Piedmont Fayette Hospital;
6. Plaintiff's medical records from Piedmont Fayette Hospital;
7. Plaintiff's medical bills from Atlantic COD ER Physicians;
8. Plaintiff's medical records from Atlantic COD ER Physicians;
9. Plaintiff's medical bills from Newfield Orthopaedics;
10. Plaintiff's medical records from Newfield Orthopaedics;
11. Plaintiff's medical bills from Laureate Medical Group;
12. Plaintiff's medical records from Laureate Medical Group;
13. Plaintiff's medical bills from Southern Regional Medical Center;
14. Plaintiff's medical records from Southern Regional Medical Center;
15. Plaintiff's medical bills from Benchmark Physical Therapy;
16. Plaintiff's medical records from Benchmark Physical Therapy;
17. Plaintiff's medical bills from Peachtree Orthopaedic Clinic;
18. Plaintiff's medical records from Peachtree Orthopaedic Clinic;
19. Plaintiff's medical bills from Emory St. Joseph Hospital;
20. Plaintiff's medical records from Emory St. Joseph Hospital;
21. Plaintiff's medical bills from Atlanta Gastroenterology Associates;

22. Plaintiff's medical records from Atlanta Gastroenterology Associates;
23. Plaintiff's medical bills from Chung Acupuncture;
24. Plaintiff's medical records from Chung Acupuncture;
25. Plaintiff's medical bills from Peachtree Neurological Clinic;
26. Plaintiff's medical records from Peachtree Neurological Clinic;
27. Plaintiff's medical bills from Dr. Freida Millhouse-Jones;
28. Plaintiff's medical records from Dr. Freida Millhouse-Jones;
29. Deposition testimony of John Scatena;
30. Deposition testimony of Monica White;
31. Deposition testimony of Dr. Shevin Pollydore;
32. Deposition testimony of Dr. John Henry;
33. Deposition testimony of Dr. Dominic Carreira;
34. Photographs of Café 290;
35. Photographs from Plaintiff's surgery;
36. Plaintiff's post-operative photographs;
37. Photographs of Plaintiff before the subject-incident;
38. Defendants' Responses to Plaintiff's Discovery Requests;
39. Defendants' Responses to Plaintiff's Request for Admissions;
40. Any and all photographs of the location of the subject-incident;
41. Demonstrative evidence of exhibits;
42. Any documents listed by Defendant.

ATTACHMENT A-2

Defendants' Evidence List

1. Picture of Floor Light
2. 3 Videos from April 12, 2018 Site Inspection
3. 11 Pictures from April 12, 2018 Site Inspection
4. Certified Medical Records from Peachtree Orthopedic Center
5. Certified Medical Records from Benchmark Rehab Partners/Atlanta Medical Center Bone and Joint Specialists
6. Certified medical Records from Newfield Orthopedics, PC
7. Certified Medical Records from Peachtree Orthopedic Surgery Center
8. Certified Medical Records from Northside Hospital
9. Certified Medical Records from Peachtree Orthopedic Clinic
10. MRI Images from Peachtree Orthopedics
11. Certified Medical Records from Southern Regional Medical Center
12. Certified Medical Records from Piedmont Fayette Hospital
13. Certified Medical Records from Chung's Acupuncture Clinic
14. Certified Medical Records from OMI Diagnostics
15. Certified Medical Records from Peachtree Neurology Clinic
16. Certified Medical Records from Dr. Frieda L. Millhouse-Jones
17. Certified Medical Records from Laureate Medical Group
18. Certified Medical Records from Northside Village Imaging
19. Medical Records from Atlanta Gastroenterology Associates
20. Certified Medical Records from The Women's Health Associates Group LLC
21. Certified Medical Records from Emory Saint Joseph's Hospital

22. Certified Medical Records from CVS Pharmacy
23. Certified Medical Records from Addison Dental Associates
24. Deposition Testimony of Dr. Shelvin Pollydore
25. Deposition Testimony of Dr. John Henry
26. Deposition Testimony of Dr. Dominic Carreira
27. Demonstrative evidence
28. Any and all documents identified in Plaintiff's Evidence List