

1 at the bottom of the page by Karen Emerly.

2 Who does the preoperative phone call?

3 THE WITNESS: The nurses from the
4 surgery center.

5 BY MR. KAFRISSEN:

6 Q. What's the purpose of that phone call?

7 A. To confirm with the patient that the eye drops
8 were started, whether the patient has questions, to
9 give the patient instructions for the day of surgery
10 such as to take their regular medicines.

11 Q. Is there anything in the note that you see in the
12 preoperative phone call, notations made by the nurse,
13 that causes you any concern in going ahead with the
14 procedure on the 20th?

15 A. Wait, this is 3/20, are you talking about the
16 preoperative phone call, is there anything that gives
17 me any concern, is that your question?

18 Q. Yes.

19 A. No, nothing.

20 Q. Right, the surgery is 3/20?

21 A. Right.

22 Q. And when are the preop orders done, there's a
23 thing called lasik surgery order and that's Page 2. At
24 the bottom, your signature appears to be on it, as well

1 carried out?

2 A. Yes.

3 Q. This sheet, which is a print out, what is this
4 sheet?

5 A. That is a sheet indicating exactly what the laser
6 is programmed to do.

7 Q. Now, this says, I don't know who wrote this on
8 the top, done 3/19, it was just on the copy. When is
9 the laser programed?

10 A. The day before surgery, normally.

11 Q. So what we're looking at here which is a sheet
12 that's says sheet 1 at the top, Page 1 at the bottom,
13 it has handwritten on the top done 3/19/97, is exactly
14 what the laser has been programed to do during the
15 surgery?

16 A. Yes.

17 Q. Do you know whether any alteration was made to
18 that programming at any time up to and through the
19 surgery?

20 A. None to my knowledge.

21 Q. Who does the programming?

22 A. Usually our director of nursing.

23 Q. How does she know how to program the laser for
24 the particular patient involved?

1 as the nurse's signature, it's pretty close to the
2 back.

3 THE WITNESS: Have you found it?

4 MS. NEWMAN: No.

5 BY MR. KAFRISSEN:

6 Q. What I have, I'll tell you, I have the consent
7 form, and I have the phone call and then I have two
8 pages of I think actually readings off of the laser and
9 then the orders.

10 A. May I look at yours?

11 Q. Sure.

12 A. I don't see it.

13 MS. NEWMAN: I'm sure they're in here
14 somewhere.

15 THE WITNESS: Preop orders.

16 BY MR. KAFRISSEN:

17 Q. When are the preop orders done?

18 A. When are they written?

19 Q. Yes, when are they written, when are they carried
20 out?

21 A. Well, they're written a couple of days before
22 surgery in preparation for the surgery and then they
23 are carried out the day of surgery.

24 Q. Okay. And were all the preoperative orders

1 A. Oh, the doctors write out exactly how they want
2 it programed for each patient, and she enters it into
3 the computer and then gives us a printout so we can
4 check and be sure that she entered precisely what we
5 want.

6 Q. The printout that we're looking at here has
7 patient name across the top, Fiorelli Cheryl, then it
8 has FIOR ODO 1 and then it has the word, right.

9 A. Yes.

10 Q. It has a bunch of columns and a bunch of rows all
11 written out by a computer?

12 A. Yes.

13 Q. The information on this sheet was the programming
14 for the laser, the instructions for the laser's
15 programming, are they made by you, were they made by
16 you for Cheryl Fiorelli?

17 A. The instructions for the laser's programing were
18 made by me.

19 Q. Did you get this sheet at some point before the
20 surgery?

21 A. Yes.

22 Q. And did you review it?

23 A. Yes.

24 Q. Was there anything about the information on this