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6 Counsel for Plaintiffs

FILED
5/14/13
DATE: _____ TIME: _____ am/pm
By: LM
CLERK, FSM SUPREME COURT
KOSRAE
TRIAL DIVISION

7 **IN THE SUPREME COURT OF**
8 **THE FEDERATED STATES OF MICRONESIA**
9 **TRIAL DIVISION – STATE OF KOSRAE**

10 **BETSY ROSE MONGKEYA, et., al.,) CIVIL ACTION NO. 2010-2002**

11 **Plaintiffs,**)

12 **v.**)

13 **KOSRAE STATE GOVERNMENT,**)
14 **KOSRAE STATE HOSPITAL, et. al.,**)

15 **Defendants.**)

**PLAINTIFF'S RESPONSE TO
DEFENDANT CANVASBACK
MISSION'S THIRD SET OF
INTERROGATORIES**

16 COME NOW, Plaintiffs, by and through the undersigned counsel,
17 and hereby respond to defendant Canvasback Missions Third Set of
18 Interrogatories as follows:

- 19 1. Identify each person whom the Plaintiffs expect to call as
20 an expert witness at trial, and state the substance of
21 the facts and opinions to which the expert is expected to
22 testify and a summary of the grounds for each opinion.

23 Response: Dr. Johnny Hedson, Surgeon at Pohnpei State
24 Hospital. The substance of Dr. Hedson's testimony centers on
25 the argument that the patient was left to die right after the
operation given that there were no nursing notes from the ward

1 to indicate whether or not vital signs were taken after the
2 decedent was wheeled into the ward to fully recover. Vital
3 signs should be taken every 15 minutes for the first hour
4 after operation, and then every 30 minutes thereafter until
5 patient is awake and responsive for all patients who had
6 underwent general anesthesia. Second, there was also no
7 indication whether or not the patient was extubated after the
8 surgery given that his nostrils were packed with gauze and he
9 was minimally responsive when leaving OR. It is reasonable to
10 keep the tracheal tube for few minutes to hours after
11 operation to keep the airway open and/or to protect the
12 patient from aspirating any saliva or blood from inadvertent
13 bleeding from the operative site. Lastly, the use of pulse
14 oxymeter was necessary given that again, the patient was
15 reported to be minimally responsive when leaving the OR.
16

17 Date 5/14/13

Betsy Rose Mongkeya
Betsy Rose Mongkeya

19 Subscribed and sworn to before me this 10th day of April 2013.

20
21 **LOUISA H. NENA**
NOTARY PUBLIC
State of Kosrae, Federated States of Micronesia
My Commission expires on the
22 12th day of June 2013

May - 13

Notary Public
State of Kosrae
Federated States of Micronesia

23 Date: 10 April 2013

24 Respectfully Submitted:
Marstella E. Jack
25 Marstella E. Jack
Counsel for Plaintiff

CERTIFICATE OF SERVICE

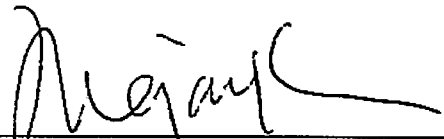
This is to certify that on 10 April 2013, I caused to be served on the following counsels the above Responses to Defendant Canvasback Missions Third Set of Interrogatories, in the following manner.

1. Cindy Haro
Attorney General
Kosrae State Government

By Hand Delivery

2. Aaron Warren
Assistant AG
FSM Department of Justice
Palikir, Pohnpei FSM 96941

By Mail



Marstella E. Jack