INTERACTIVE MEDIATION BRIEF

The Chart Knew by Midnight

Five days after a planned operation, a patient's vital signs crossed every line on the hospital's own sepsis screen. The first antibiotic came seven hours and forty minutes later.

MATTER	Brennan v. Leland-Ashby Memorial Hospital, No. 26-CV-1127
FORUM	Circuit Court for Dunmore County, State of Franklin. Mediation set for November 10, 2026
WRITTEN FOR	The mediator and counsel for the hospital
DATED	November 3, 2026
PREPARED BY	Counsel for the plaintiff, Daniel Brennan. Your firm's name and letterhead sit here.
RECORD	13 exhibits; the 13 cited pages are attached below.

Confidential mediation statement under Franklin Rule of Evidence 408 and the court's mediation order.

> **Composite sample.** Every person, company, place, document and number here is invented to show the form. It is set in the State of Franklin, a jurisdiction that does not exist.

01 The person

02 What happened

03 Why it happened

04 What they knew

05 The harm

06 The numbers

07 The ask

BEAT 01 · THE PERSON

Daniel Brennan is 52 and has worked with his hands for 27 years.

He is a journeyman electrician, married, with two daughters. [BRN-EMP-0002] [BRN-EMP-0002] On January 9, 2026 he entered Leland-Ashby Memorial for a planned bowel operation. [LAM-001950]

WHO THIS HAPPENED TO

PHOTOGRAPH GOES HERE

Mr. Brennan on a job site, 2024

Daniel Brennan

Journeyman electrician

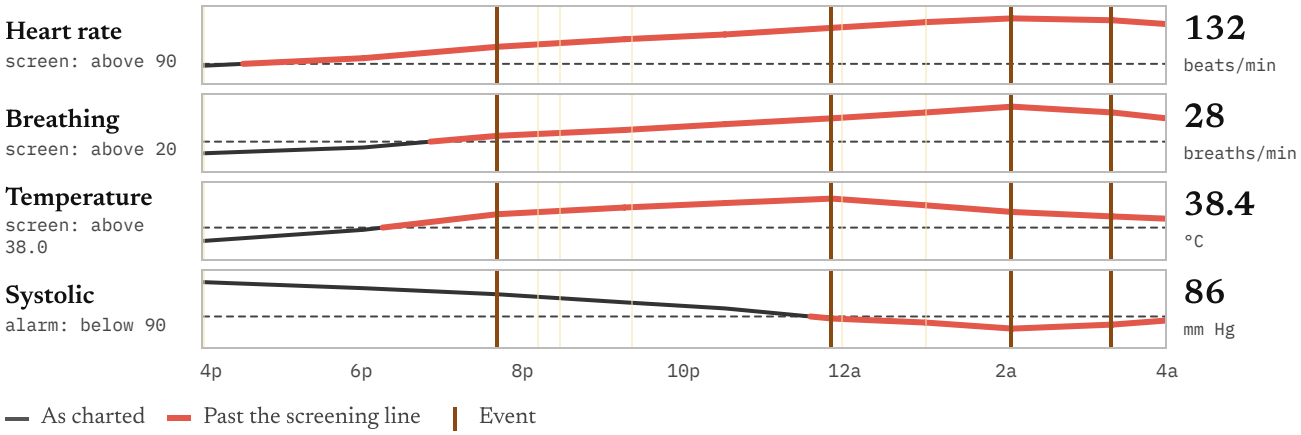
AGE	52
WORK	Twenty-seven years wiring commercial buildings
HOME	Married 24 years, two daughters
ADMITTED	January 9, 2026, for a planned operation

BEAT 02 · WHAT HAPPENED

At 6:00 p.m. he was recovering as expected.

Five days after surgery his temperature, breathing and blood pressure were inside every line the hospital uses to screen for sepsis. [LAM-000212] [LAM-001102]

ROOM 512, THE FIFTH NIGHT AFTER SURGERY



SINCE THE SCREEN WAS MET

7 h 40 min

to the first antibiotic

4:00 p.m. Fifth day after surgery. Every sign is inside its line.

7:40 p.m. Three signs cross the hospital's screening lines. The alert fires.

8:10 p.m. The nurse pages the surgical resident.

8:26 p.m. The resident calls back and orders acetaminophen.

9:20 p.m. Second page: pain worse, belly distended. An order comes from a distance.

11:50 p.m. Systolic pressure 88. The rule: call rapid response at once.

11:58 p.m. Third page. The resident is in an operating room.

1:00 a.m. Fourth page. Pressure 84.

2:05 a.m. The nurse calls the rapid response team herself.

3:20 a.m. The first dose of antibiotics goes in.

January 14 to 15, 2026. Values as charted (LAM-000212). Dashed lines are the hospital's own screening lines (LAM-001102). Red is the part of each trace past its line.

At 7:40 p.m. the chart met the hospital's sepsis screen.

Temperature 38.6, heart rate 108, breathing 22. [LAM-000212] The hospital's policy calls that a positive screen and starts two clocks: a provider at the bedside in 30 minutes, antibiotics in 60. [LAM-001102] [LAM-001102]

The nurse paged the surgical resident twice. He ordered Tylenol.

Her first page gave the numbers and said the screen was positive. [LAM-000702] Her second said his belly was distended and asked the resident to come. [LAM-000702]

The answer both times was acetaminophen, ordered from somewhere else. [LAM-000702] [LAM-000702]

By ten to midnight his blood pressure had fallen below 90.

The 11:50 reading was 88 over 50. [LAM-000212] The policy says to call the rapid response team at once. [LAM-001102] The charge nurse said to keep paging. [LAM-000241]

At 2:05 a.m. the nurse called rapid response herself.

She had paged four times in six hours. [LAM-000702] [LAM-000702] Her note reads: *Called rapid response myself.* [LAM-000241]

The first antibiotic went in at 3:20 a.m.

That is seven hours and forty minutes after the screen was met. [LAM-000803] Take the clock and run the night yourself.

The scan found a leak where the bowel had been joined.

His lactate was 6.1. [LAM-000803] A CT at 6:30 a.m. showed the leak, and he was back in the operating room at 8:15. [LAM-000803] [LAM-000803]

WHAT THE MORNING FOUND

EX. 7 · RAPID RESPONSE AND INTENSIVE CARE RECORD LAM-000803

TIME	EVENT
2:10 a.m.	Rapid response team at bedside
2:48 a.m.	Lactate 6.1 mmol/L (drawn 2:20)
3:20 a.m.	Piperacillin-tazobactam, first dose
4:10 a.m.	Transferred to intensive care; norepinephrine started
6:30 a.m.	CT: leak at the bowel join, free fluid
8:15 a.m.	Return to operating room: washout, colostomy

BEAT 03 · WHY IT HAPPENED

One second-year resident was covering 61 patients.

The hospital's night schedule put a single resident over three surgical services. [LAM-001340] From 10:40 p.m. to 1:35 a.m. he was assisting in an operating room. [LAM-001340]

WHO WAS COVERING THE FLOOR

EX. 6 · NIGHT COVERAGE AND OPERATING ROOM LOG — LAM-001340

Resident on call	K. Sorensen, second-year resident. Covering general surgery, trauma and vascular floors: 61 patients at 7:00 p.m.
Operating room 3	Trauma laparotomy, 10:40 p.m. to 1:35 a.m. Assisting: K. Sorensen.
Attending on call	At home. First call logged from the hospital: 2:15 a.m.

He never came to the bedside.

He testified that he took the first page as post-operative fever and saw the temperature. [Sorensen Dep. 38:4] [Sorensen Dep. 39:10] The page in front of him listed three abnormal signs and the words *sepsis screen positive*. [LAM-000702]

Asked whether he would have gone had he been covering one service, he said: *I'd like to think so.* [Sorensen Dep. 52:2]

THE RESIDENT: TESTIMONY AND PAGE

UNDER OATH, JULY 21, 2026

EX. 9 · DEPOSITION OF DR. K. SORENSEN — SORENSEN DEP. 38 TO 52

38:4 **Q.** Did you go to the bedside after the first page?
A. No. I took it as post-operative fever.

39:10 **Q.** Did you look at the heart rate and the breathing?
A. I saw the temperature.

WHAT THE PAGES SAID

EX. 4 · PAGING AND ORDER LOG — LAM-000702

TIME	FROM	ENTRY
8:10 p.m.	RN Adeyemi	Page to surgical resident: "Rm 512 Brennan POD 5. T 38.6 HR 108 RR 22. Sepsis screen positive. Please evaluate."
9:20 p.m.	RN Adeyemi	Page: "HR 116 T 38.9. Belly distended, pain 8 of 10. Please come see him."

No one called the attending surgeon.

When a provider does not come in 15 minutes, the policy sends the charge nurse to the attending. [LAM-001102] The attending's first call that night came at 2:15 a.m. [LAM-001340]

THE STEP THE POLICY REQUIRED NEXT

EX. 2 · POLICY NUR-417, ADULT SEPSIS SCREENING — LAM-001102

No response	If the provider has not come in 15 minutes, the charge nurse calls the attending.
Systolic below 90	Call the rapid response team at once. Any staff member may call.

BEAT 04 · WHAT THEY KNEW

The hospital's own software raised the alarm four times before midnight.

The record system fired a sepsis alert at 7:42, 9:16, 10:31 and 11:51 p.m. [LAM-000655] [LAM-000655] [LAM-000655] [LAM-000655] Each one carried the rule on its face. [LAM-000655]

The resident opened the chart once, for 41 seconds. [LAM-000655]

THE HOSPITAL'S OWN ALERT

EX. 3 · SEPSIS ALERT AUDIT TRAIL — LAM-000655

Text shown with each alert: "Per NUR-417: provider to bedside within 30 minutes. Antibiotics within 60 minutes."

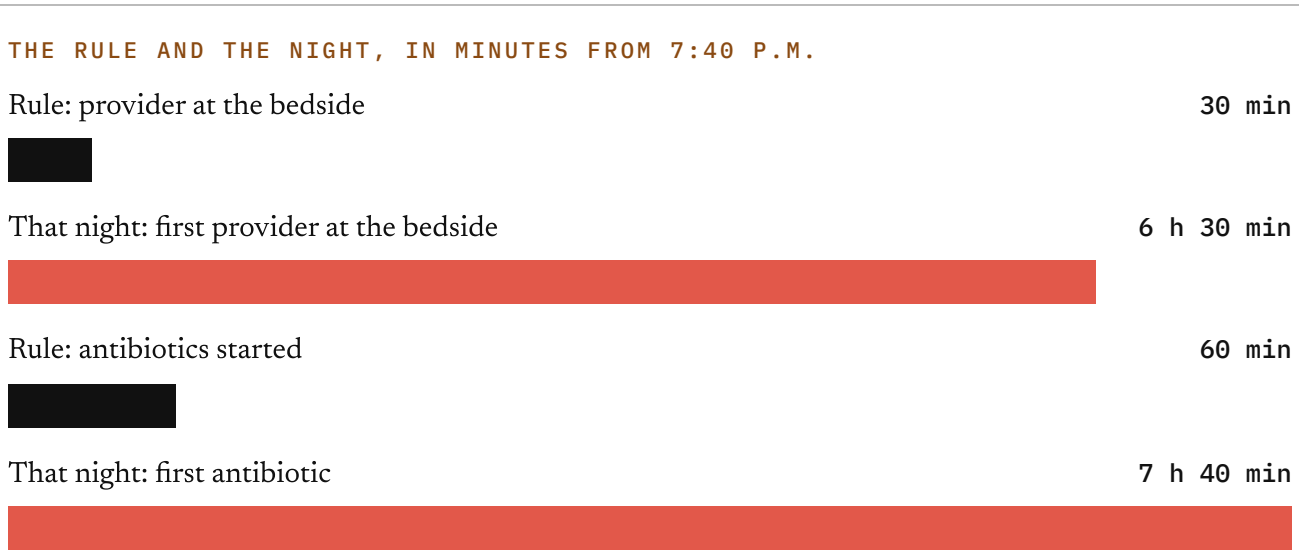
FIRED	SEEN BY	RESPONSE SELECTED
7:42 p.m.	RN Adeyemi	Notifying provider
9:16 p.m.	RN Adeyemi	Provider aware
10:31 p.m.	RN Adeyemi	Provider aware
11:51 p.m.	RN Adeyemi	Provider aware
2:06 a.m.	RN Adeyemi	Rapid response called

Chart opened by Dr. Sorensen: 9:21 p.m., from a workstation in the surgical lounge, for 41 seconds.

The rule says 30 and 60 minutes. The night ran 390 and 460.

The first provider reached the bedside at 2:10 a.m., with the rapid response team. [LAM-000803] The policy's limits are written in minutes. [LAM-001102] [LAM-001102]

THE RULE AND THE NIGHT, IN MINUTES FROM 7:40 P.M.



Bars are drawn to one scale. Sources: LAM-001102, LAM-000803.

The hospital's best points are on this page too.

Its expert says a leak occurs without negligence. [DEF-EXP-0003] Mr. Brennan does not claim otherwise.

Its expert says earlier antibiotics may not have mattered. [DEF-EXP-0003] Plaintiff's surgeon says treatment by 9:00 p.m. would more likely than not have prevented the shock. [BRN-EXP-0006]

THE HOSPITAL'S BEST POINTS, AND THE RECORD

They say	A leak can happen without anyone's negligence.
Record	Agreed. The claim is the seven hours after the chart showed it.
They say	Earlier antibiotics may not have changed the outcome.
Record	The hospital's own policy sets the clock at 60 minutes.

BEAT 05 · THE HARM

Fifty-eight days in the hospital, twenty-three in intensive care.

Mr. Brennan went into septic shock. His kidneys failed and he was on dialysis for 19 days. [LAM-001950] [LAM-001950]

JANUARY 9 TO MARCH 8, 2026

58
days in the hospital

23
days in intensive care

19
days on dialysis

2
amputations, hand and foot

Source: discharge summary, LAM-001950.

He lost four fingers of his right hand and the toes of his left foot.

The drugs that held his blood pressure up starved his hands and feet of blood. The amputations were on February 10. [LAM-001950] He left with a colostomy. [LAM-001950]

He has not been cleared to return to his trade. [BRN-EMP-0002]

DISCHARGE SUMMARY

EX. 8 · DISCHARGE SUMMARY — LAM-001950

Course	Septic shock from an anastomotic leak. Acute kidney injury; dialysis for 19 days. Kidney function partly recovered.
Limb loss	Loss of blood supply to the extremities while on vasopressors. February 10: amputation of four fingers of the right hand and all toes of the left foot.
At discharge	Colostomy in place. To inpatient rehabilitation.

BEAT 06 · THE NUMBERS

Economic loss: $3,715,200.

Medical bills to date are $1,184,300, and future care has a present value of $1,460,000. [BRN-ECON-0004] [BRN-ECON-0004]

He has lost $58,900 in earnings so far and $1,012,000 in future earnings and benefits. [BRN-ECON-0004] [BRN-ECON-0004]

ECONOMIC LOSS

Medical bills to date 58 hospital days, surgery, dialysis, prosthetics	$1,184,300
Future care life-care plan, present value	$1,460,000
Earnings lost to date	$58,900
Future earnings and benefits journeyman scale to age 65, present value	$1,012,000
Economic loss	**$3,715,200**

Source: economist's report, BRN-ECON-0004.

BEAT 07 · THE ASK

Mr. Brennan will resolve the case at mediation for $8,750,000.

The figure is his economic loss of $3,715,200 and $5,034,800 for a working man's hand, his foot, and the years he will live with both.

A jury will decide this case on the hospital's own documents: its policy, its alert and its nurse's pages. [LAM-001102] [LAM-000655] [LAM-000702]

THE DEMAND AT MEDIATION

$8,750,000
to resolve all claims

7 h 40 min
against a 60-minute rule

FOR COUNSEL

Cite table

Every cited statement in the piece, in reading order, beside the page it rests on. Counsel checks each line and signs off before anything is sent.

NO.	BEAT	STATEMENT	SOURCE	CHECKED
01	The person	He is a journeyman electrician, married, with two daughters.	[Ex. 12 · BRN-EMP-0002] [Ex. 12 · BRN-EMP-0002]	☐
02	The person	On January 9, 2026 he entered Leland-Ashby Memorial for a planned bowel operation.	[Ex. 8 · LAM-001950]	☐
03	What happened	Five days after surgery his temperature, breathing and blood pressure were inside every line the hospital uses to screen for sepsis.	[Ex. 1 · LAM-000212] [Ex. 2 · LAM-001102]	☐
04	What happened	Temperature 38.6, heart rate 108, breathing 22.	[Ex. 1 · LAM-000212]	☐
05	What happened	The hospital's policy calls that a positive screen and starts two clocks: a provider at the bedside in 30 minutes, antibiotics in 60.	[Ex. 2 · LAM-001102] [Ex. 2 · LAM-001102]	☐
06	What happened	Her first page gave the numbers and said the screen was positive.	[Ex. 4 · LAM-000702]	☐
07	What happened	Her second said his belly was distended and asked the resident to come.	[Ex. 4 · LAM-000702]	☐
08	What happened	The answer both times was acetaminophen, ordered from somewhere else.	[Ex. 4 · LAM-000702] [Ex. 4 · LAM-000702]	☐
09	What happened	The 11:50 reading was 88 over 50.	[Ex. 1 · LAM-000212]	☐
10	What happened	The policy says to call the rapid response team at once.	[Ex. 2 · LAM-001102]	☐
11	What happened	The charge nurse said to keep paging.	[Ex. 5 · LAM-000241]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
12	What happened	She had paged four times in six hours.	[Ex. 4 · LAM-000702] [Ex. 4 · LAM-000702]	☐
13	What happened	Her note reads: Called rapid response myself.	[Ex. 5 · LAM-000241]	☐
14	What happened	That is seven hours and forty minutes after the screen was met.	[Ex. 7 · LAM-000803]	☐
15	What happened	His lactate was 6.1.	[Ex. 7 · LAM-000803]	☐
16	What happened	A CT at 6:30 a.m. showed the leak, and he was back in the operating room at 8:15.	[Ex. 7 · LAM-000803] [Ex. 7 · LAM-000803]	☐
17	Why it happened	The hospital's night schedule put a single resident over three surgical services.	[Ex. 6 · LAM-001340]	☐
18	Why it happened	From 10:40 p.m. to 1:35 a.m. he was assisting in an operating room.	[Ex. 6 · LAM-001340]	☐
19	Why it happened	He testified that he took the first page as post-operative fever and saw the temperature.	[Ex. 9 · Sorensen Dep. 38:4] [Ex. 9 · Sorensen Dep. 39:10]	☐
20	Why it happened	The page in front of him listed three abnormal signs and the words sepsis screen positive.	[Ex. 4 · LAM-000702]	☐
21	Why it happened	Asked whether he would have gone had he been covering one service, he said: I'd like to think so.	[Ex. 9 · Sorensen Dep. 52:2]	☐
22	Why it happened	When a provider does not come in 15 minutes, the policy sends the charge nurse to the attending.	[Ex. 2 · LAM-001102]	☐
23	Why it happened	The attending's first call that night came at 2:15 a.m.	[Ex. 6 · LAM-001340]	☐
24	What they knew	The record system fired a sepsis alert at 7:42, 9:16, 10:31 and 11:51 p.m.	[Ex. 3 · LAM-000655] [Ex. 3 · LAM-000655] [Ex. 3 · LAM-000655] [Ex. 3 · LAM-000655]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
25	What they knew	Each one carried the rule on its face.	[Ex. 3 · LAM-000655]	☐
26	What they knew	The resident opened the chart once, for 41 seconds.	[Ex. 3 · LAM-000655]	☐
27	What they knew	The first provider reached the bedside at 2:10 a.m., with the rapid response team.	[Ex. 7 · LAM-000803]	☐
28	What they knew	The policy's limits are written in minutes.	[Ex. 2 · LAM-001102] [Ex. 2 · LAM-001102]	☐
29	What they knew	Its expert says a leak occurs without negligence.	[Ex. 11 · DEF-EXP-0003]	☐
30	What they knew	Its expert says earlier antibiotics may not have mattered.	[Ex. 11 · DEF-EXP-0003]	☐
31	What they knew	Plaintiff's surgeon says treatment by 9:00 p.m. would more likely than not have prevented the shock.	[Ex. 10 · BRN-EXP-0006]	☐
32	The harm	Mr. Brennan went into septic shock. His kidneys failed and he was on dialysis for 19 days.	[Ex. 8 · LAM-001950] [Ex. 8 · LAM-001950]	☐
33	The harm	The drugs that held his blood pressure up starved his hands and feet of blood. The amputations were on February 10.	[Ex. 8 · LAM-001950]	☐
34	The harm	He left with a colostomy.	[Ex. 8 · LAM-001950]	☐
35	The harm	He has not been cleared to return to his trade.	[Ex. 12 · BRN-EMP-0002]	☐
36	The numbers	Medical bills to date are $1,184,300, and future care has a present value of $1,460,000.	[Ex. 13 · BRN-ECON-0004] [Ex. 13 · BRN-ECON-0004]	☐
37	The numbers	He has lost $58,900 in earnings so far and $1,012,000 in future earnings and benefits.	[Ex. 13 · BRN-ECON-0004] [Ex. 13 · BRN-ECON-0004]	☐
38	The ask	A jury will decide this case on the hospital's own documents: its policy, its alert and its nurse's pages.	[Ex. 2 · LAM-001102] [Ex. 3 · LAM-000655] [Ex. 4 · LAM-000702]	☐

38 cited statements, 13 exhibits. Sign-off: _____ Date: _____

ATTACHED

The record

This sample attaches the cited pages. A client piece attaches each exhibit in full, behind the same chips, on a private link.

EX.	DOCUMENT	DATE	BATES RANGE	CITED
1	**Vital signs flowsheet, room 512**	January 14 to 15, 2026	LAM-000210 to LAM-000216	3×
2	**Policy NUR-417, adult sepsis screening**	Revised June 2025	LAM-001100 to LAM-001104	6×
3	**Sepsis alert audit trail**	January 14 to 15, 2026	LAM-000650 to LAM-000658	4×
4	**Paging and order log**	January 14 to 15, 2026	LAM-000700 to LAM-000704	6×
5	**Nursing notes**	January 14 to 15, 2026	LAM-000240 to LAM-000244	2×
6	**Night coverage and operating room log**	January 14, 2026	LAM-001338 to LAM-001342	3×
7	**Rapid response and intensive care record**	January 15, 2026	LAM-000800 to LAM-000809	4×
8	**Discharge summary**	March 8, 2026	LAM-001948 to LAM-001953	4×
9	**Deposition of Dr. K. Sorensen**	July 21, 2026	Pages 1 to 104	2×
10	**Report of plaintiff's surgical expert**	August 4, 2026	BRN-EXP-0001 to BRN-EXP-0014	1×

EX.	DOCUMENT	DATE	BATES RANGE	CITED
11	**Defense expert disclosure**	September 15, 2026	DEF-EXP-0001 to DEF-EXP-0009	2×
12	**Employment record**	April 2026	BRN-EMP-0001 to BRN-EMP-0012	2×
13	**Economist's report**	August 18, 2026	BRN-ECON-0001 to BRN-ECON-0019	2×

EXHIBIT 1

Vital signs flowsheet, room 512

Hospital chart · January 14 to 15, 2026
Produced by the hospital
LAM-000210 to LAM-000216

EX. 1 · VITAL SIGNS FLOWSHEET, ROOM 512 LAM-000212

BRENNAN, Daniel. Post-operative day 5

TIME	HR	RR	TEMP °C	BP	RN
4:00 p.m.	88	16	37.4	124/76	TL
6:00 p.m.	96	18	37.9	118/72	TL
7:40 p.m.	108	22	38.6	112/68	MA
9:15 p.m.	116	24	38.9	104/62	MA
10:30 p.m.	121	26	39.1	98/58	MA
11:50 p.m.	128	28	39.3	88/50	MA
1:00 a.m.	134	30	39.0	84/46	MA
2:05 a.m.	138	32	38.7	78/42	MA
3:20 a.m.	136	30	38.5	82/44	MA
4:00 a.m.	132	28	38.4	86/48	MA

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 2

Policy NUR-417, adult sepsis screening

Hospital nursing policy · Revised June 2025
Produced by the hospital
LAM-001100 to LAM-001104

Screening and response

Positive screen	Two or more: temperature above 38.0 °C or below 36.0; heart rate above 90; respiratory rate above 20; white count above 12,000 or below 4,000; with a known or possible source of infection. A surgical wound is a possible source.
Provider	Notified at once. At the bedside within 30 minutes.
Treatment	Lactate and blood cultures drawn. Antibiotics started within 60 minutes of a positive screen.
No response	If the provider has not come in 15 minutes, the charge nurse calls the attending.
Systolic below 90	Call the rapid response team at once. Any staff member may call.

EXHIBIT 3

Sepsis alert audit trail

Electronic record audit log · January 14 to 15, 2026
Produced by the hospital
LAM-000650 to LAM-000658

EX. 3 · SEPSIS ALERT AUDIT TRAIL LAM-000655

Best-practice alert: “Sepsis screen POSITIVE.” Patient: BRENNAN, Daniel

Text shown with each alert: “Per NUR-417: provider to bedside within 30 minutes. Antibiotics within 60 minutes.”

FIRED	SEEN BY	RESPONSE SELECTED
7:42 p.m.	RN Adeyemi	Notifying provider
9:16 p.m.	RN Adeyemi	Provider aware
10:31 p.m.	RN Adeyemi	Provider aware
11:51 p.m.	RN Adeyemi	Provider aware
2:06 a.m.	RN Adeyemi	Rapid response called

Chart opened by Dr. Sorensen: 9:21 p.m., from a workstation in the surgical lounge, for 41 seconds.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 4

Paging and order log

Hospital paging system record · January 14 to 15, 2026
Produced by the hospital
LAM-000700 to LAM-000704

EX. 4 · PAGING AND ORDER LOG LAM-000702

TIME	FROM	ENTRY
8:10 p.m.	RN Adeyemi	Page to surgical resident: “Rm 512 Brennan POD 5. T 38.6 HR 108 RR 22. Sepsis screen positive. Please evaluate.”
8:26 p.m.	Dr. Sorensen	Call back, 1 minute. Verbal order: acetaminophen.
9:20 p.m.	RN Adeyemi	Page: “HR 116 T 38.9. Belly distended, pain 8 of 10. Please come see him.”
9:22 p.m.	Dr. Sorensen	Order entered remotely: acetaminophen 1 g. “Continue to monitor.”
11:58 p.m.	RN Adeyemi	Page: “BP 88/50 HR 128. Need you at the bedside.”
1:00 a.m.	RN Adeyemi	Page: “BP 84/46. Still waiting.”
2:05 a.m.	RN Adeyemi	Rapid response team called.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 5

Nursing notes

Hospital chart · January 14 to 15, 2026
Produced by the hospital
LAM-000240 to LAM-000244

EX. 5 · NURSING NOTES LAM-000241

TIME	NOTE
9:25 p.m.	Resident ordered Tylenol by phone. Has not come to bedside. Patient states “something is wrong.”
11:55 p.m.	Charge RN notified of BP 88/50. Told resident is in the OR with a trauma; keep paging.
2:05 a.m.	Called rapid response myself. M. Adeyemi RN

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 6

Night coverage and operating room log

Department of Surgery records · January 14, 2026
Produced by the hospital
LAM-001338 to LAM-001342

EX. 6 · NIGHT COVERAGE AND OPERATING ROOM LOG — LAM-001340

Resident on call	K. Sorensen, second-year resident. Covering general surgery, trauma and vascular floors: 61 patients at 7:00 p.m.
Operating room 3	Trauma laparotomy, 10:40 p.m. to 1:35 a.m. Assisting: K. Sorensen.
Attending on call	At home. First call logged from the hospital: 2:15 a.m.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 7

Rapid response and intensive care record

Hospital chart · January 15, 2026
Produced by the hospital
LAM-000800 to LAM-000809

EX. 7 · RAPID RESPONSE AND INTENSIVE CARE RECORD — LAM-000803

TIME	EVENT
2:10 a.m.	Rapid response team at bedside
2:48 a.m.	Lactate 6.1 mmol/L (drawn 2:20)
3:20 a.m.	Piperacillin-tazobactam, first dose
4:10 a.m.	Transferred to intensive care; norepinephrine started
6:30 a.m.	CT: leak at the bowel join, free fluid
8:15 a.m.	Return to operating room: washout, colostomy

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 8

Discharge summary

Hospital chart · March 8, 2026
Produced by the hospital
LAM-001948 to LAM-001953

EX. 8 · DISCHARGE SUMMARY — LAM-001950

Admitted	January 9, 2026, for a planned laparoscopic sigmoid colectomy (recurrent diverticulitis).
Stay	58 days, 23 of them in intensive care.
Course	Septic shock from an anastomotic leak. Acute kidney injury; dialysis for 19 days. Kidney function partly recovered.
Limb loss	Loss of blood supply to the extremities while on vasopressors. February 10: amputation of four fingers of the right hand and all toes of the left foot.
At discharge	Colostomy in place. To inpatient rehabilitation.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 9

Deposition of Dr. K. Sorensen

Deposition transcript · July 21, 2026
Taken by plaintiff
Pages 1 to 104

EX. 9 · DEPOSITION OF DR. K. SORENSEN — SORENSEN DEP. 38 TO 52

38:4 **Q.** Did you go to the bedside after the first page?
A. No. I took it as post-operative fever.

39:10 **Q.** Did you look at the heart rate and the breathing?
A. I saw the temperature.

52:2 **Q.** Would you have gone if you had been covering one service?
A. I'd like to think so.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 10

Report of plaintiff’s surgical expert

Expert report · August 4, 2026
Served by plaintiff
BRN-EXP-0001 to BRN-EXP-0014

EX. 10 · REPORT OF PLAINTIFF’S SURGICAL EXPERT BRN-EXP-0006

Opinions

1. A patient five days out from a colectomy with fever, a fast heart, fast breathing and rising pain has a leak until proven otherwise. The standard of care is a bedside evaluation within the hour.

2. Antibiotics, fluids and a scan begun by 9:00 p.m. would more likely than not have prevented septic shock, and with it the dialysis and the amputations.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 11

Defense expert disclosure

Expert disclosure · September 15, 2026
Served by the hospital
DEF-EXP-0001 to DEF-EXP-0009

EX. 11 · DEFENSE EXPERT DISCLOSURE DEF-EXP-0003

Summary of opinions

A. An anastomotic leak is a known complication of colectomy and occurs without negligence.

B. The patient’s course was driven by the leak. Earlier antibiotics may not have changed the outcome.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 12

Employment record

Union and employer records · April 2026
Plaintiff's records
BRN-EMP-0001 to BRN-EMP-0012

EX. 12 · EMPLOYMENT RECORD BRN-EMP-0002

Trade	Journeyman inside wireman since 1999. Twenty-seven years in the trade.
Return to work	Not cleared. The work requires fine handling with both hands and ladder work.
Family	Married 24 years. Two daughters, 19 and 16.

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT

EXHIBIT 13

Economist's report

Expert report · August 18, 2026
Served by plaintiff
BRN-ECON-0001 to BRN-ECON-0019

EX. 13 · ECONOMIST'S REPORT BRN-ECON-0004

Summary of economic loss

ITEM	AMOUNT
Medical bills to date	$1,184,300
Future care, present value	$1,460,000
Earnings lost to date	$58,900
Future earnings and benefits, present value	$1,012,000
Total	$3,715,200

INVENTED RECORD · COMPOSITE SAMPLE · THE CHART KNEW BY MIDNIGHT