INTERACTIVE DEMAND PACKAGE

Two Aides, Forty Beds

An 84-year-old woman rang for help to the bathroom and waited. That night the unit had one aide for forty residents. Its own plan called for three.

MATTER	Claim of Eleanor Whitcombe, by her attorney-in-fact Ruth Whitcombe-Diaz, against Tolliver-Marsh Care Center and Tolliver-Marsh Senior Living
FORUM	Before suit. Dunmore County, State of Franklin
WRITTEN FOR	The facility's liability insurer
DATED	January 15, 2026
PREPARED BY	Counsel for Eleanor Whitcombe. Your firm's name and letterhead sit here.
RECORD	13 exhibits; the 15 cited pages are attached below.

Settlement communication under Franklin Rule of Evidence 408.
Open until 5:00 p.m. on February 17, 2026.

> **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

Eleanor Whitcombe is 84. Until last May she lived on her own.

She was a school librarian for 31 years. [TMC-0004] She dressed, bathed and cooked for herself and walked with a cane. [TMC-0004] [WHT-STMT-0001]

She came to Tolliver-Marsh Care Center after pneumonia, to get strong enough to go home. [TMC-0004]

WHO THIS HAPPENED TO

PHOTOGRAPH GOES HERE

Mrs. Whitcombe reading to a kindergarten class, 2024

Eleanor Whitcombe

Retired school librarian

AGE	84
BEFORE	Lived alone, walked with a cane, read to kindergartners on Tuesdays
ADMITTED	May 19, 2025, to regain strength after pneumonia
GOAL	Home in four to six weeks

BEAT 02 · WHAT HAPPENED

Her care plan said she was never to go to the bathroom alone.

The facility scored her a high risk for falls on the day after she arrived. [TMC-0031] Its plan required one staff member for every trip to the toilet, offered every two hours and at 2:00 a.m. [TMC-0031] [TMC-0031]

HER CARE PLAN FOR FALLS

EX. 1 · ADMISSION RECORD AND CARE PLAN — TMC-0031

Risk	High. Fall-risk score 65. Weak after illness; urgency at night.
Transfers and toileting	Assist of one staff member, every time.
Schedule	Offer the toilet every 2 hours while awake, and at 11 p.m., 2 a.m. and 5 a.m.
Devices	Bed alarm on at all times. Call light within reach.

On the night of June 13 the unit had two aides for forty residents.

The posted staffing form shows one nurse and two aides. [SVY-0041] At 1:00 a.m. one aide was sent to cover another unit. For the next two and a half hours a single aide had all forty. [SVY-0007]

MAPLE UNIT, JUNE 1 TO 14, 2025

Aides on the unit	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Day plan 4	4	4	3	4	4	3	4	4	4	3	4	4	3	4
Evening plan 4	4	3	3	4	3	3	3	4	3	3	4	3	3	3
Night plan 3	2	2	3	2	2	2	2	3	2	2	3	2	2	2

At or above the staffing plan · Below the plan · The night of the fall

NIGHT SHIFTS BELOW THE PLAN

11 of 14

40 residents on the unit

Jun 13, night 2 aides for 40 residents; the plan calls for 3. Call lights: 19 min typical wait, 49 min longest. At 1:00 a.m. one aide was sent to another unit, leaving one for 40 residents until 3:30.

Each square is one shift. The number is the aides on the unit, from the posted staffing forms (SVY-0041). The plan is the facility's own assessment (SVY-0058). Call-light waits are from the system report (SVY-0066).

At 1:42 a.m. she pressed her call light.

The system logged the light in room 214 at 1:42 and did not log it cancelled until 2:31. [SVY-0066] Two other rooms on the hall waited 38 minutes each.

THE CALL-LIGHT SYSTEM, THAT NIGHT

EX. 4 · CALL-LIGHT SYSTEM REPORT, MAPLE UNIT — SVY-0066

ROOM	LIGHT ON	CANCELLED	MINUTES
209	1:15 a.m.	1:53 a.m.	38
214	1:42 a.m.	2:31 a.m.	49
221	2:02 a.m.	2:40 a.m.	38

Whole shift: 19 calls. Typical wait 19 minutes. Longest 49 minutes.

At 2:19 a nurse found her on the bathroom floor.

She had waited 37 minutes. She told the nurse: *I rang and rang. I couldn't wait.* [TMC-0112]

Her bed alarm never sounded. It had no batteries. [TMC-0112]

THE NURSE'S NOTE

EX. 5 · NURSING NOTE, JUNE 14 — TMC-0112

TIME	NOTE
2:19 a.m.	Heard resident calling from room 214. Found on bathroom floor on right side. States "I rang and rang. I couldn't wait." Right leg shortened and turned out.
2:25 a.m.	Bed alarm did not sound. Alarm unit found with no batteries.
2:40 a.m.	911 called. 3:05 a.m. to Dunmore County Hospital.

BEAT 03 · WHY IT HAPPENED

The facility's own plan calls for three aides at night.

Federal rules make every nursing home assess what its residents need and staff to it. Tolliver-Marsh's assessment for Maple Unit: four aides by day, four in the evening, three at night. [SVY-0058] [SVY-0058]

THE FACILITY'S OWN STAFFING PLAN

EX. 3 · FACILITY ASSESSMENT, STAFFING PLAN — SVY-0058

Aides required	Day 4. Evening 4. Night 3.
Basis	22 residents need one or two people to transfer. 14 are at high risk of falling.

It scheduled two on eleven nights out of fourteen.

The posted forms for June 1 to 14 show two aides on eleven nights. [SVY-0041] State surveyors confirmed the count from payroll. [SVY-0011]

Tap any shift to see its staffing and how long residents waited.

MAPLE UNIT, JUNE 1 TO 14, 2025

Aides on the unit	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Day plan 4	4	4	3	4	4	3	4	4	4	3	4	4	3	4
Evening plan 4	4	3	3	4	3	3	3	4	3	3	4	3	3	3
Night plan 3	2	2	3	2	2	2	2	3	2	2	3	2	2	2

At or above the staffing plan · Below the plan · The night of the fall

NIGHT SHIFTS BELOW THE PLAN

11 of 14

40 residents on the unit

Jun 13, night 2 aides for 40 residents; the plan calls for 3. Call lights: 19 min typical wait, 49 min longest. At 1:00 a.m. one aide was sent to another unit, leaving one for 40 residents until 3:30.

Red squares are shifts staffed below the facility's own plan. Sources: SVY-0041, SVY-0058, SVY-0066.

The administrator told the state where the number came from.

Asked about night staffing, the administrator said it *is set by the labor budget we get from corporate.* [SVY-0007]

WHAT THE ADMINISTRATOR TOLD THE STATE

EX. 6 · STATE COMPLAINT SURVEY, STATEMENT OF DEFICIENCIES — SVY-0007

From 1:00 to 3:30 a.m. on June 14, one aide was on Maple Unit for 40 residents. The second aide had been sent to Birch Unit to cover a call-off.

Administrator, interviewed July 29: staffing "is set by the labor budget we get from corporate."

BEAT 04 · WHAT THEY KNEW

The state had cited the same shift eight months earlier.

In October 2024 surveyors cited Maple Unit's night staffing after residents reported waits of more than 30 minutes. [PUB-0012]

The administrator signed a plan of correction promising three aides on nights from November 15, 2024. [PUB-0012]

EIGHT MONTHS EARLIER

EX. 7 · ANNUAL SURVEY AND PLAN OF CORRECTION, 2024 — PUB-0012

Sufficient nursing staff, cited. Night shift, Maple Unit: residents reported waiting more than 30 minutes for help to the toilet.

Plan of correction, signed by the administrator: "Maple Unit will be staffed with three aides on nights effective November 15, 2024."

Its reported staffing sat well under the state average.

The facility reported 3.08 nursing hours per resident per day. [PUB-0021] The state average was 3.92. [PUB-0021]

NURSE STAFFING, HOURS PER RESIDENT PER DAY



Bars are drawn to one scale. Source: federal payroll-based staffing data, PUB-0021.

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

A resident may decline help. Mrs. Whitcombe asked for it and waited 37 minutes. [SVY-0066] [TMC-0112]

A wound can form despite good care. The turning record shows 31 of 84. [TMC-0188] [SVY-0011]

THE FACILITY'S BEST POINTS, AND THE RECORD

They say	She chose to get up without help.
Record	She rang and waited 37 minutes. Her plan said she was not safe alone.
They say	Pressure injuries happen to frail patients after a hip fracture.
Record	31 of 84 turns were charted. The state cited actual harm.

BEAT 05 · THE HARM

A broken hip, and then a wound to the bone.

The fall broke her right hip, and surgeons fixed it the next day. [WHT-MED-0006] [WHT-MED-0006] She went back to Tolliver-Marsh unable to put weight on the leg. [WHT-MED-0006]

JUNE 14 TO SEPTEMBER 9, 2025

Jun 14	Right hip broken in the fall
Jun 15	Surgery to fix the hip
Jul 3	Pressure injury first charted, stage 2
Aug 2	Stage 4: down to the bone
Aug 4	Hospital again, wound infected
Sep 9	To another facility. Not walking.

She was to be turned every two hours. The record shows 31 turns of 84.

A pressure injury was charted on July 3. [TMC-0188] In the week of July 13 the staff documented 31 of the 84 turns ordered. [TMC-0188] By August 2 the wound had reached stage 4, and she had lost 14 pounds. [TMC-0188]

REPOSITIONING, JULY 13 TO 19



Bars are drawn to one scale. Sources: TMC-0188; SVY-0011.

She has not stood up since June 14.

The hospital found the wound infected, with bone involved, and operated on August 6. [WHT-MED-0006] [WHT-MED-0006] She was discharged to a different facility and does not walk. [WHT-MED-0006] [WHT-STMT-0001]

HER DAUGHTER'S STATEMENT

EX. 11 · STATEMENT OF RUTH WHITCOMBE-DIAZ WHT-STMT-0001

Before the pneumonia my mother lived on her own. She drove to the school on Tuesdays to read to the kindergartners, and she walked her dog twice a day.

She has not stood up since June 14.

BEAT 06 · THE NUMBERS

Medical bills to date: $339,300.

Two hospital admissions, one surgery on the hip and one on the wound. [WHT-BILL-0002] The care she will now need for the rest of her life has a present value of $418,000. [WHT-BILL-0002]

MEDICAL BILLS

Dunmore County Hospital, June hip fracture admission	$61,400
Surgeon and anesthesia	$18,900
Dunmore County Hospital, August to September wound infection, 36 days	$212,700
Wound care and IV antibiotics	$46,300
Billed to date	**$339,300**

Source: billing ledger, WHT-BILL-0002.

There were two occurrences, and each has its own limit.

The policy pays up to $1,000,000 for each occurrence. [INS-0002] The fall of June 14 is one. The wound that formed in July, from a separate failure to turn her, is another.

THE LOSS BESIDE THE COVERAGE



Bars are drawn to one scale.

BEAT 07 · THE ASK

Mrs. Whitcombe will resolve both claims for $2,000,000.

Her bills and future care come to $757,300. The rest is for a woman who walked in on a cane, planning to go home, and will not walk again.

The facility promised the state three aides on nights. [PUB-0012] It staffed two, and on June 14 it staffed one. [SVY-0007]

THE DEMAND

$2,000,000
the limit for each of two occurrences

February 17, 2026
at 5:00 p.m., this offer closes

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	She was a school librarian for 31 years.	[Ex. 1 · TMC-0004]	☐
02	The person	She dressed, bathed and cooked for herself and walked with a cane.	[Ex. 1 · TMC-0004] [Ex. 11 · WHT-STMT-0001]	☐
03	The person	She came to Tolliver-Marsh Care Center after pneumonia, to get strong enough to go home.	[Ex. 1 · TMC-0004]	☐
04	What happened	The facility scored her a high risk for falls on the day after she arrived.	[Ex. 1 · TMC-0031]	☐
05	What happened	Its plan required one staff member for every trip to the toilet, offered every two hours and at 2:00 a.m.	[Ex. 1 · TMC-0031] [Ex. 1 · TMC-0031]	☐
06	What happened	The posted staffing form shows one nurse and two aides.	[Ex. 2 · SVY-0041]	☐
07	What happened	At 1:00 a.m. one aide was sent to cover another unit. For the next two and a half hours a single aide had all forty.	[Ex. 6 · SVY-0007]	☐
08	What happened	The system logged the light in room 214 at 1:42 and did not log it cancelled until 2:31.	[Ex. 4 · SVY-0066]	☐
09	What happened	She had waited 37 minutes. She told the nurse: I rang and rang. I couldn't wait.	[Ex. 5 · TMC-0112]	☐
10	What happened	Her bed alarm never sounded. It had no batteries.	[Ex. 5 · TMC-0112]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
11	Why it happened	Federal rules make every nursing home assess what its residents need and staff to it. Tolliver-Marsh's assessment for Maple Unit: four aides by day, four in the evening, three at night.	[Ex. 3 · SVY-0058] [Ex. 3 · SVY-0058]	☐
12	Why it happened	The posted forms for June 1 to 14 show two aides on eleven nights.	[Ex. 2 · SVY-0041]	☐
13	Why it happened	State surveyors confirmed the count from payroll.	[Ex. 6 · SVY-0011]	☐
14	Why it happened	Asked about night staffing, the administrator said it is set by the labor budget we get from corporate.	[Ex. 6 · SVY-0007]	☐
15	What they knew	In October 2024 surveyors cited Maple Unit's night staffing after residents reported waits of more than 30 minutes.	[Ex. 7 · PUB-0012]	☐
16	What they knew	The administrator signed a plan of correction promising three aides on nights from November 15, 2024.	[Ex. 7 · PUB-0012]	☐
17	What they knew	The facility reported 3.08 nursing hours per resident per day.	[Ex. 8 · PUB-0021]	☐
18	What they knew	The state average was 3.92.	[Ex. 8 · PUB-0021]	☐
19	What they knew	A resident may decline help. Mrs. Whitcombe asked for it and waited 37 minutes.	[Ex. 4 · SVY-0066] [Ex. 5 · TMC-0112]	☐
20	What they knew	A wound can form despite good care. The turning record shows 31 of 84.	[Ex. 9 · TMC-0188] [Ex. 6 · SVY-0011]	☐
21	The harm	The fall broke her right hip, and surgeons fixed it the next day.	[Ex. 10 · WHT-MED-0006] [Ex. 10 · WHT-MED-0006]	☐
22	The harm	She went back to Tolliver-Marsh unable to put weight on the leg.	[Ex. 10 · WHT-MED-0006]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
23	The harm	A pressure injury was charted on July 3.	[Ex. 9 · TMC-0188]	☐
24	The harm	In the week of July 13 the staff documented 31 of the 84 turns ordered.	[Ex. 9 · TMC-0188]	☐
25	The harm	By August 2 the wound had reached stage 4, and she had lost 14 pounds.	[Ex. 9 · TMC-0188]	☐
26	The harm	The hospital found the wound infected, with bone involved, and operated on August 6.	[Ex. 10 · WHT-MED-0006] [Ex. 10 · WHT-MED-0006]	☐
27	The harm	She was discharged to a different facility and does not walk.	[Ex. 10 · WHT-MED-0006] [Ex. 11 · WHT-STMT-0001]	☐
28	The numbers	Two hospital admissions, one surgery on the hip and one on the wound.	[Ex. 12 · WHT-BILL-0002]	☐
29	The numbers	The care she will now need for the rest of her life has a present value of $418,000.	[Ex. 12 · WHT-BILL-0002]	☐
30	The numbers	The policy pays up to $1,000,000 for each occurrence.	[Ex. 13 · INS-0002]	☐
31	The ask	The facility promised the state three aides on nights.	[Ex. 7 · PUB-0012]	☐
32	The ask	It staffed two, and on June 14 it staffed one.	[Ex. 6 · SVY-0007]	☐

32 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	**Admission record and care plan**	May 19 to 20, 2025	TMC-0001 to TMC-0038	5×
2	**Posted daily nurse staffing, Maple Unit**	June 1 to 14, 2025	SVY-0040 to SVY-0054	2×
3	**Facility assessment, staffing plan**	January 2025	SVY-0056 to SVY-0061	1×
4	**Call-light system report, Maple Unit**	Night of June 13 to 14, 2025	SVY-0064 to SVY-0068	2×
5	**Nursing note, June 14**	June 14, 2025	TMC-0110 to TMC-0114	3×
6	**State complaint survey, statement of deficiencies**	Survey completed July 30, 2025	SVY-0003 to SVY-0019	5×
7	**Annual survey and plan of correction, 2024**	October 17, 2024	PUB-0010 to PUB-0016	3×
8	**Federal staffing data**	Second quarter 2025	PUB-0020 to PUB-0022	2×
9	**Wound and turning records**	June 20 to August 2, 2025	TMC-0180 to TMC-0196	4×

EX.	DOCUMENT	DATE	BATES RANGE	CITED
10	**Dunmore County Hospital records**	June to September 2025	WHT-MED-0001 to WHT-MED-0240	4×
11	**Statement of Ruth Whitcombe-Diaz**	November 2025	WHT-STMT-0001 to WHT-STMT-0003	2×
12	**Bills and future care**	December 2025	WHT-BILL-0001 to WHT-BILL-0030	2×
13	**Coverage disclosure**	October 28, 2025	INS-0001 to INS-0002	1×

EXHIBIT 1

Admission record and care plan

Facility chart · May 19 to 20, 2025
Produced by the facility on the resident's request
TMC-0001 to TMC-0038

EX. 1 · ADMISSION RECORD AND CARE PLAN TMC-0004

Admission summary. WHITCOMBE, Eleanor, age 84

Admitted	May 19, 2025, from Dunmore County Hospital after pneumonia. Goal: return home in four to six weeks.
Before admission	Lived alone. Independent in dressing, bathing and meals. Walked with a cane.
Background	Retired school librarian, 31 years. Widow. Daughter Ruth holds power of attorney.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EX. 1 · ADMISSION RECORD AND CARE PLAN TMC-0031

Care plan: falls

Risk	High. Fall-risk score 65. Weak after illness; urgency at night.
Transfers and toileting	Assist of one staff member, every time.
Schedule	Offer the toilet every 2 hours while awake, and at 11 p.m., 2 a.m. and 5 a.m.
Devices	Bed alarm on at all times. Call light within reach.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 2

Posted daily nurse staffing, Maple Unit

Daily staffing forms required to be posted · June 1 to 14, 2025
State survey file, by public records request
SVY-0040 to SVY-0054

EX. 2 · POSTED DAILY NURSE STAFFING, MAPLE UNIT SVY-0041

Night shift, 11 p.m. to 7 a.m. Census 40

NIGHT OF	LICENSED NURSES	AIDES
Jun 10	1	2
Jun 11	1	3
Jun 12	1	2
Jun 13	1	2
Jun 14	1	2

June 1 to 14: two aides on 11 nights, three aides on 3 nights.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 3

Facility assessment, staffing plan

Facility's own assessment under federal rules · January 2025
State survey file, by public records request
SVY-0056 to SVY-0061

EX. 3 · FACILITY ASSESSMENT, STAFFING PLAN SVY-0058

Maple Unit, 40 beds

Aides required	Day 4. Evening 4. Night 3.
Basis	22 residents need one or two people to transfer. 14 are at high risk of falling.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 4

Call-light system report, Maple Unit

System report · Night of June 13 to 14, 2025
State survey file, by public records request
SVY-0064 to SVY-0068

EX. 4 · CALL-LIGHT SYSTEM REPORT, MAPLE UNIT — SVY-0066

ROOM	LIGHT ON	CANCELLED	MINUTES
209	1:15 a.m.	1:53 a.m.	38
214	1:42 a.m.	2:31 a.m.	49
221	2:02 a.m.	2:40 a.m.	38

Whole shift: 19 calls. Typical wait 19 minutes. Longest 49 minutes.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 5

Nursing note, June 14

Facility chart · June 14, 2025
Produced by the facility on the resident's request
TMC-0110 to TMC-0114

EX. 5 · NURSING NOTE, JUNE 14 — TMC-0112

TIME	NOTE
2:19 a.m.	Heard resident calling from room 214. Found on bathroom floor on right side. States "I rang and rang. I couldn't wait." Right leg shortened and turned out.
2:25 a.m.	Bed alarm did not sound. Alarm unit found with no batteries.
2:40 a.m.	911 called. 3:05 a.m. to Dunmore County Hospital.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 6

State complaint survey, statement of deficiencies

State survey agency report · Survey completed July 30, 2025
Public record
SVY-0003 to SVY-0019

EX. 6 · STATE COMPLAINT SURVEY, STATEMENT OF DEFICIENCIES SVY-0007

Accidents and supervision. Level: actual harm

From 1:00 to 3:30 a.m. on June 14, one aide was on Maple Unit for 40 residents. The second aide had been sent to Birch Unit to cover a call-off.

Administrator, interviewed July 29: staffing “is set by the labor budget we get from corporate.”

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EX. 6 · STATE COMPLAINT SURVEY, STATEMENT OF DEFICIENCIES SVY-0011

Sufficient nursing staff. Pressure injuries. Level: actual harm

Payroll showed two aides on nights on 11 of the 14 nights reviewed. The facility’s own assessment calls for three.

Resident 1’s turning record for July 13 to 19 documents 31 of 84 scheduled repositionings.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 7

Annual survey and plan of correction, 2024

State survey agency report · October 17, 2024
Public record
PUB-0010 to PUB-0016

EX. 7 · ANNUAL SURVEY AND PLAN OF CORRECTION, 2024 PUB-0012

Sufficient nursing staff, cited. Night shift, Maple Unit: residents reported waiting more than 30 minutes for help to the toilet.

Plan of correction, signed by the administrator: “Maple Unit will be staffed with three aides on nights effective November 15, 2024.”

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 8

Federal staffing data

Payroll-based staffing data, public file · Second quarter 2025
Public record
PUB-0020 to PUB-0022

EX. 8 · FEDERAL STAFFING DATA PUB-0021

Nurse staffing, this facility	3.08 hours per resident per day
State average	3.92 hours per resident per day
Owner	Tolliver-Marsh Senior Living, 14 facilities

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 9

Wound and turning records

Facility chart · June 20 to August 2, 2025
Produced by the facility on the resident’s request
TMC-0180 to TMC-0196

EX. 9 · WOUND AND TURNING RECORDS TMC-0188

DATE	ENTRY
Jul 3	Stage 2 pressure injury at the base of the spine, first charted
Jul 13 to 19	Repositioning ordered every 2 hours: 31 of 84 documented
Aug 2	Stage 4. Weight 114 lb, down from 128 lb at admission

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 10

Dunmore County Hospital records

Hospital records · June to September 2025
Claimant's records, by authorization
WHT-MED-0001 to WHT-MED-0240

EX. 10 · DUNMORE COUNTY HOSPITAL RECORDS WHT-MED-0006

Summary of two admissions

DATE	EVENT
Jun 14	Displaced fracture of the right hip
Jun 15	Surgical fixation
Jun 20	Returned to Tolliver-Marsh, no weight on the leg
Aug 4	Admitted with an infected stage 4 pressure injury, 7 by 6 cm, bone involved
Aug 6	Surgical cleaning of the wound; six weeks of IV antibiotics
Sep 9	Discharged to a different nursing facility. Not walking.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 11

Statement of Ruth Whitcombe-Diaz

Signed statement · November 2025
Claimant
WHT-STMT-0001 to WHT-STMT-0003

EX. 11 · STATEMENT OF RUTH WHITCOMBE-DIAZ WHT-STMT-0001

Before the pneumonia my mother lived on her own. She drove to the school on Tuesdays to read to the kindergartners, and she walked her dog twice a day.

She has not stood up since June 14.

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 12

Bills and future care

Billing ledger and life-care plan summary · December 2025
Claimant's records and expert
WHT-BILL-0001 to WHT-BILL-0030

EX. 12 · BILLS AND FUTURE CARE — WHT-BILL-0002

ITEM	AMOUNT
Dunmore County Hospital, June	$61,400
Surgeon and anesthesia	$18,900
Dunmore County Hospital, August to September	$212,700
Wound care and IV antibiotics	$46,300
Billed to date	$339,300
Future care caused by the injuries, present value	$418,000

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS

EXHIBIT 13

Coverage disclosure

Letter from the facility's insurer · October 28, 2025
Received in response to counsel's letter
INS-0001 to INS-0002

EX. 13 · COVERAGE DISCLOSURE — INS-0002

Professional and general liability	$1,000,000 each occurrence; $3,000,000 aggregate

INVENTED RECORD · COMPOSITE SAMPLE · TWO AIDES, FORTY BEDS