Document Dumps:
Dealing with Large Amounts of Paper –
Sorting, Highlighting and Organizing

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I.   INTRODUCTION

Some cases involve millions of documents. If you have such a case, God help you. Seriously, if your case involves millions of documents, then you will be using techniques far more sophisticated than found in this paper. You would probably retain third-party vendors who are used to handling rooms and rooms full of paper.

My topic is a bit more manageable – how to deal with a case that may involve 10,000 to 30,000 pages of documents.

It surprises me sometimes how much paper can be generated by discovery in even a relatively "normal" case. As my practice has matured, and I have learned better what documents to seek in discovery, my files have grown larger. In our office it is not uncommon for a case to have in excess of 10,000 pages of documents. Over the years we have developed a system for dealing with the large volume of documents that is "dumped" on our office during discovery. Here is how we do it.

II.   THE BASICS

When you have a large number of documents in a case, you want to be able to work with those documents. You want to be able to find documents. You want to be able to find facts that are contained in the documents. You want to be able to find facts that relate to issues in the case.

You want to be able to find people, and to know what they say. The way to accomplish this is through software.

There are a number of software programs on the market that help you organize documents. Our firm happens to like and use CaseMap. Although there are many programs, and each has its own benefits and drawbacks, the basic tools for working with a large number of documents are pretty simple. The three basic tools are: (1) "sort," (2) "find," and (3) "filter."

Software programs can help you put facts, documents, and people in lists. You can then sort those lists in a number of ways. Two common ways of sorting are alphabetic and numeric. Doing various types of "sorts" allows you to find information.

You can also use the "find" feature in the software. The "find" feature allows you to look for a word or the name of a person and find everywhere in that case that the word or person's name is mentioned.

You can "filter." Case management software programs allow you to "filter" information according to criteria that you designate. You might filter facts that have been marked "Key" to bring up only those factors you believe are important. You might filter a series of facts by the type of fact involved (i.e., medical, liability, wage loss).

Document management software programs can be extraordinarily complex and intimi-dating to deal with. I have found that the programs are less intimidating if you scale back your goals just a bit, and simplify what you are doing. In our office we break these tasks out as follows:

1. Find a document;
2. Find a person;
3. What do various people know?
4. What are the issues – what facts support or oppose each issue?

5.   Working with facts.

III.   FIND A DOCUMENT

A.   Put the document into your system.

You first have to put the document into your computer system. There are various ways to enter documents into a system. They can be in an electronic format, such as a word document or a deposition transcript. Documents may be in other forms, one of the most common of which is a PDF.

In the system you name the document and create a link to wherever that document is stored on your computer. That way, when you click on the name of the document, the document pops up on your screen.

B.   The Basics – "Sort," "Find" and "Filter."

Remember, whenever you are trying to find something, the computer can help you. The computer allows you to "sort" documents (i.e., numeric or alphabetic), the computer allows you to "find" documents by allowing you to search for a word. And lastly, the computer helps you find documents by "filtering" according to some criteria that you have set. This is explained in more detail below.

C.   Sorting documents.

You can sort documents in many different ways. One common way is to sort a document list by name. **Exhibit No. 1** is a list of documents that have been sorted by the first column which reads "Full Name." Notice that documents named with a number float to the top. Then documents are listed in alphabetical order beginning with "A". If you know the name of the

document you are looking for, and the rough area of the alphabet that it appears, then you can find the document.

You can sort documents by the type of document. **Exhibit No. 2** is a list of documents sorted by column 2 labeled "Document Type." As you can see, the documents that are articles float to the top, followed by Court-file documents, economic loss documents, and insurance documents. If you know the type of document you want to work with, then you can "sort" by "type" and quickly locate a document.

D.   Use the "find" command to find a document.

If you don't recall the name of the document, or the document type, then you can search for a document by using the "find" function. For example, **Exhibit No. 3** is a list of documents where I searched using the word "Seattle" because I knew an article had been published in the Seattle PI. If you look at **Exhibit No. 3** at the second to the last document on the page, you will see reference to a Seattle PI article on the dangers of methamphetamine.

E.   Filter documents.

When you "sort" documents, it puts the documents in a certain order. When you "filter" documents, you tell the computer you only want to see documents that meet your filter criteria. Therefore, if you have a very lengthy list of documents, and you filter by certain criteria, you may be able to bring the list of documents down to a very small number.

Exhibit No. 4 is an illustration of a list of documents that has been filtered by the "document type," that is "police report." By running such a filter, it leaves only those documents which have been categorized as "police reports."

The software programs that I have seen allow you to classify documents in many different ways. Some common document classifications might include: deposition, discovery, economic loss, insurance, medical records, medical bills, police report, etc.

There are other ways to use document management software to find documents, but you get the basic idea.

IV. FIND A PERSON

A. Put the person into your computer.

The first thing you need to do is enter the person into your software program. You can enter as much information about that person as you like. Obviously, you will enter the name of the person and their role in the case. You might also enter their address, phone number, what type of witness they are (more on that later), and any other information you think is important.

B. The Basics – "Sort," "Find" and "Filter."

Just like with documents, you find people by sorting them (usually alphabetic). You can also use the "find" function to find a person whose name you know part of but can't quite remember it all. Lastly, you can filter people by the criteria that you set.

C. "Sort" alphabetically.

One of the easiest ways to find people in your system is to sort alphabetically. **Exhibit No. 5** is a list of people in a case, sorted by their last names. This is a common way to be able to quickly locate a person.

D. **"Filter" by "type" of witness.**

In our cases, witnesses are classified by the type of witness they are. The witness types that we typically use are: adjuster, attorney, defendant, expert-damage, expert-liability, fact-damage, fact-liability, other person, plaintiff, police, and unknown.

At the time we enter a person into the system, we put down what type of witness they are using the categories described above. **Exhibit No. 6** is a list of witnesses sorted by the second column which is the "type" of witness. The first two witnesses on the list are adjusters. The next people are attorneys. Thereafter the list continues with various experts and continues until all types of witnesses are listed.

E. **"Find" "key" witnesses.**

We typically enter the names of every person that we come across relating to a case. Some of these people may have a fairly minor part in the case, others are major. If somebody is likely to be called as a witness at trial, we mark a checkmark in a checkbox by that witness's name. **Exhibit No. 7** is a list of witnesses sorted by the third column which is labeled "Key-RKD." These are the witnesses that I believe will be called at trial. When I want to see that list of key witnesses, I simply "filter" by the criteria "Key" and the computer will show a list of all the persons who have a checkmark in the "Key" box.

F. **Use multiple "filters" and "sorts."**

Sometimes it will be necessary to use multiple "filters" or "sorts" before you get the list that you want to work with. For example, I could have a case with 300 people listed in the computer software. By first filtering for "Key" witnesses, the number might come down to 35. If I then filter by the "type" of witness, such as "expert-damage," I might be left with the three doctors who are going to testify as experts regarding my client's damages.

V. WHAT DO VARIOUS PEOPLE KNOW

A common thing that attorneys want to know is what facts a specific witness knows. We might then also want to know what the source of those facts are.

Well, you first have to enter the facts. How to enter facts into a document management system will be described later, but for now, just assume that facts have been entered. When you enter a fact that fact will have a source. We learn facts from documents. For example, your client's medical records will contain facts about your injuries and treatment. The medical records are the source of medical facts. We learn facts from persons. For example, a person might be interviewed and say that the light was red when the defendant entered the intersection and collided with your client. So, the source for that document is a person. We learn facts from all kinds of other sources such as transcripts, letters, etc. We can even learn facts from photographs.

Once the facts are entered and you have a source for that fact, it is easy to determine what various people know about the various facts of the case.

As an example, **Exhibit No. 8** is a report run that shows what witness Brianne Akins knows about a case. Her part is relatively modest. Some blood was taken from the defendant by a police officer named Hansmann. Officer Hansmann entered the blood into evidence. Officer Oliver then mailed the blood to Brianne Akins by UPS. Running a simple report on Brianne Akins shows me the chain of custody evidence that I will need to prove the blood draw at trial.

The case software management programs that I have seen allow you multiple ways to run reports showing what various people know.

VI.   WHAT ARE THE ISSUES – WHAT FACTS SUPPORT OR OPPOSE EACH ISSUE

Cases have issues. In an automobile collision case the issue might be who crossed over the center line, or who had the red light at the intersection. Or a case might involve a medical issue, or a patent issue. The list of potential "issues" is endless.

Case document management software allows you to create a list of issues you believe are important and to link facts to those issues. Once you have entered the facts, then you can go back and run a report on who had the red light. The report will show every reference to the red light, what was said, and who said it.

As an example, **Exhibit No. 9** is a list of facts relating to an issue of how much smoke was breathed in by a little girl in a house fire. One measure of how much smoke was breathed in is a carboxyhemoglobin reading. By running a report that references "carboxyhemoglobin," the software filtered out and displayed 11 facts out of 2,788 facts. It is easy to find every reference in the case about the issue of "carboxyhemoglobin."

CaseMap also allows you to create a "Issue Outline." After the facts have been entered, they are then linked to an issue (it is easy). You can then run a report that lists all of the facts that relate to an issue that you are interested in.

As an example, **Exhibit No. 10** shows an "issue outline" in a motor vehicle collision case. If you look at the second line down, you will see that there are 131 facts that relate to defendant's fault in this case. There are 32 facts that relate to allegations that the plaintiff was at fault. By clicking on one button, the computer generates a report listing each of the facts that relates to that issue. If you look further down the list, at line 2.8, you will see that there are two facts that relate to loss of consortium. Clicking on a button would show you those two facts.

VII. WORKING WITH FACTS

A. Introduction.

Before using case management software, I used to read cases, make outlines of depositions, do memos of meetings with witnesses, and organize my file in a well-thought-out hardcopy paper system. There is a bit of learning curve to implement case management software. However, I did not find it hugely difficult to make a change from our fairly organized paper system to an organized computer document management system. Here are the basic steps involved.

B. Enter facts in system.

Facts come to us from many sources. We get them from police reports, witness statements, and medical records. We get facts from letters, memos, emails, and conversations with witnesses and with our clients.

When you are working with a lot of documents, you first enter the document into the system, as was described earlier. Then you enter a fact or a quote from that document. The fact is automatically linked to the source for that fact and the page where it came from. It is a real pleasure to look at a medical fact and then click on the link. The software will take you right to page 343 of the 1,200 page Harborview medical record, and you can see the fact in context.

What information you enter into the fact section of the software depends on the case, and what you will want to look for later. **Exhibit No. 11** is a screen from a fact chronology from CaseMap. If you look at the various columns, you can see how facts are entered, and you can see how they can be retrieved later.

The first column on **Exhibit No. 11** is "Date & Time." You put a date and time for a fact that allows you to sort the facts chronologically. It allows you to create timelines. You can also filter and select facts that occurred on a certain day.

The next column is the "fact text." Here is where you enter the fact. It can be a very short description, of somewhat longer. Document management software employs a number of tricks to speed the entry of fact information. For example, if you are typing along, the software will anticipate words that you are about to enter and enter them for you. You can also "copy" from digital documents and paste into the fact text.

The third column is the "source" column. This column tells the attorney what the source of the fact was. The source might be a document, or it might be a person. This column tells where the attorney got the fact.

You can filter by "source." For example, you might have ten facts that are entered that have the source "May 16, 2002 John Smith memo." If you filter by that source then all the facts that were in that memo will pop up.

You can filter by the fourth column which is "fact type." When facts are entered we typically categorize them by the following categories: economic, insurance, liability, medical, other.

If I want to look at the facts in a case that relate to insurance coverage, I just filter by the fact type "insurance." Only the facts that relate to insurance will appear. If I want to look at the facts that relate to medical issues in the case, then I filter by the fact type "medical." Only the medical facts will appear.

You can also filter by the fifth column, marked "key." Some facts are more important than others. We put a check mark in the "Key" box next to a fact that is very important. There may be several thousand facts in a complex case. However, by filtering for only those facts that are "key" the number of facts becomes much more manageable. If we then run a second filter by fact type, the numbers get even smaller. For example, we could first filter for "key" facts. If we then take those key facts and filter again by the fact type "medical," we are left with only the key facts that are medical facts.

We can also filter by the sixth column which is the "linked issues." As described earlier, you can create issues in a case such as liability, economic loss, pain and suffering, or any other issue that is present in your case. When you enter a fact, the software allows you to quickly click on what issue or issues you want to link the fact to. Thereafter, you can filter by the issue and see all the facts that relate to the issue that you are interested in.

I've included a seventh column labeled "staff notes." This is a place to put the attorney's thoughts and comments about various facts. When you put together fact chronologies for sending to experts, or even to the defense, you probably don't want your thoughts about the various facts going to the defense. It is a simple matter to close that column. If you are creating a chronology to mail to the defense attorney, then you would close that column, print the document and send it to the defense attorney. When you are working with the facts and using your own judgment and creating your work product, then you can make entries in this column.

VIII. CONCLUSION

The beauty of a document management system is its flexibility. Once the information is entered, you can find it, analyze it, and print it more quickly than you could ever imagine under a

paper-based system. You can find specific facts when you need them. You can find what specific people know with a couple of clicks.

I don't know about you, but when I have more than 20 depositions in a case, I can't remember what each person said on each specific issue. Document management software allows me to do that. And, heaven forbid, trying to remember specific contents of 10-15,000 pages of paper. I need help. A document management system is the help that I need.

Bob Dawson
10/04/07, WSTLA – Disciplined Discovery
(W:\RKD\seminar\10-04-07, WSTLA– Disciplined Discovery\Document Dumps ....doc)

Full Name	Document Type +	Rev'd RKD?	From	To
2002 Tax Return - Part A	Economic Loss	✓	??/??/2002	??/??/2002
2002 Tax Return - Part B	Economic Loss	✓	??/??/2002	??/??/2002
2003 Tax Return	Economic Loss	✓	??/??/2003	??/??/2003
2004 Tax Return	Economic Loss	✓	??/??/2004	??/??/2004
2005 Tax Return	Economic Loss	✓	??/??/2005	??/??/2005
2006 Tax Return	Economic Loss	✓	??/??/2006	??/??/2006
AIG Cancellation Documents	Insurance		Mon 01/22/2007	Mon 01/22/2007
Amica Auto Policy - from client	Insurance	✓	Mon 01/01/2007	Tue 01/01/2008
Amica Homeowners Policy - from client	Insurance	✓	Mon 01/01/2007	Tue 01/01/2008
Amica Rental Homeowners Policy - from client	Insurance	✓	Mon 01/01/2007	Tue 01/01/2008
Amica Umbrella Policy - from client	Insurance	✓	Sat 01/01/2005	Sun 01/01/2006
Amica Umbrella Policy - from client	Insurance	✓	Mon 01/01/2007	Tue 01/01/2008
Amphetamines and Driving	article	✓	To Be Determined	To Be Determined
Amphetamines: An Update on Forensic Issues	article	✓	??/??/2001	??/??/2001
Blog re: collision	article	✓	Sun 02/18/2007	Sun 02/18/2007
Cause & Manner of Death in Fatalities Involving Methamphetamine	article	✓	To Be Determined	To Be Determined

EXHIBIT 1

Full Name	Document Type +	Rev'd RKD?	From	To
Seattle PI - The dangers of meth cannot be understood	article	✓	Mon 12/13/1999	Mon 12/13/1999
Fatigue, Alcohol, Other Drugs, and Medical Factors in Fatal-to-Driver Heavy Truck Crashes	article	✓	To Be Determined	To Be Determined
Amphetamines and Driving	article	✓	To Be Determined	To Be Determined
Cause & Manner of Death in Fatalities Involving Methamphetamine	article	✓	To Be Determined	To Be Determined
Seattle PI - An epidemic in our midst: methamphetamine	article	✓	Sun 12/12/1999	Sun 12/12/1999
Snohomish County Prosecutors Pleadings Filed	Court File	✓	To Be Determined	To Be Determined
Snohomish County Prosecutors Jury Instructions	Court File	✓	To Be Determined	To Be Determined
2005 Tax Return	Economic Loss	✓	??/??/2005	??/??/2005
2004 Tax Return	Economic Loss	✓	??/??/2004	??/??/2004
2006 Tax Return	Economic Loss	✓	??/??/2006	??/??/2006
2002 Tax Return - Part B	Economic Loss	✓	??/??/2002	??/??/2002
2002 Tax Return - Part A	Economic Loss	✓	??/??/2002	??/??/2002
2003 Tax Return	Economic Loss	✓	??/??/2003	??/??/2003
Scott Dilworth Wage Loss Statement	Economic Loss	✓	Tue 02/13/2007	Fri 06/22/2007
Amica Homeowners Policy - from client	Insurance	✓	Mon 01/01/2007	Tue 01/01/2008
AIG Cancellation Documents	Insurance		Mon 01/22/2007	Mon 01/22/2007

EXHIBIT 2

Full Name	Document Type +	Rev'd RKD?	From	To
Methamphetamine Fact Sheet	article	✓	To Be Determined	To Be Determined
HeraldNet - Trial goes to Jury	article	✓	Fri 04/20/2007	Fri 04/20/2007
NW Cycle News	article	✓	Tue 04/17/2007	Tue 04/17/2007
Blog re: collision	article	✓	Sun 02/18/2007	Sun 02/18/2007
Gazette Times	article	✓	Mon 03/12/2007	Mon 03/12/2007
HeraldNet Article - Wreck Leaves Officer Battered	article	✓	Thu 02/15/2007	Thu 02/15/2007
HeraldNet Article re: collision	article	✓	Sat 03/03/2007	Sat 03/03/2007
HeraldNet Article re: trial	article	✓	Tue 04/17/2007	Tue 04/17/2007
HeraldNet Article - Two MC officers injured in hit & run wreck	article	✓	Wed 02/14/2007	Wed 02/14/2007
Methamphetamine and Driving Impairment	article	✓	To Be Determined	To Be Determined
LPD News	article	✓	Wed 02/14/2007	Wed 02/14/2007
International Trailer - Towing Tips	article	✓	To Be Determined	To Be Determined
Amphetamines: An Update on Forensic Issues	article	✓	??/??/2001	??/??/2001
Methamphetamine - Effects on Human Performance and Behavior	article	✓	??/??/2002	??/??/2002
Seattle PI - The dangers of meth cannot be understated	article	✓	Mon 12/13/1999	Mon 12/13/1999
Fatigue, Alcohol, Other Drugs, and Medical Factors in Fatal-to-Driver Heavy	article	✓	To Be Determined	To Be Determined

EXHIBIT 3

	Full Name	Document Type +	Rev'd RKD?	From	To
	LPD Investigative Report - Complete	Police Report	✓	To Be Determined	To Be Determined
	Snohomish Police Department vehicle prowl 06-10-07	Police Report	✓	Sun 06/10/2007	Sun 06/10/2007
	SNOPAC 911 Tape Transcription	Police Report	✓	Tue 02/13/2007	Tue 02/13/2007
	DUI Toxicology Report	Police Report	✓	Thu 02/22/2007	Tue 03/06/2007
	Snohomish County Prosecutor's File	Police Report	✓	To Be Determined	To Be Determined
	Snohomish County Sheriff Collision Report	Police Report	✓	Tue 02/13/2007	Tue 02/13/2007
	LPD Investigative Report	Police Report	✓	Tue 02/13/2007	Tue 03/06/2007

EXHIBIT 4

Full Name	Short Name	Role In Case	Type +
Brianne Akins	AkinsB	Washington State Toxicology Laboratory analyst	Expert--Liability
Christopher H. Allan, M.D.	AllanC	Hand surgeon--Harborview	Expert--Damage
Paul Arroyos	ArroyosP	Skagit County Sheriff's Department Sheriff, tended Scott Dilworth at scene	Police
Alan Baker	BakerA	Snohomish County Sheriff's Department's department lead investigator - detective, took photos	Police
David Barei, M.D.	BareiD	Harborview Medical Center	Expert--Damage
Joe Beard	BeardJ	Snohomish County Sheriff's Department detective	Police
Pamela Beaton, CPA	BeatonP	Scott Dilworth's CPA	Expert--Damage
Ann Bernethy	BernethyA	mother of Christopher Church	Fact--Liability
Dana K Bernethy	BernethyD	uncertain	Unknown
John Bernethy	BernethyJ	step-father of Christopher Church	Fact--Liability
Robert Bernethy	BernethyR	uncertain	Unknown
Doug Blair	BlairD	prior driver of trailer	
Mike Briggs	BriggsM	DawsonBrown, P.S. investigator	Plaintiff
Peter Brown	BrownP	attorney for Scott Dilworth	Attorney
Ronald L. Brown, M.D.	BrownR	Providence Everett Medical Center - Colby, listed as witness in Snohomish County Prosecutor's File	Expert--Damage
Dalin D. Carner	CarnerD	friend of Christopher Church	Fact--Liability

EXHIBIT 5

Full Name	Type +	Role In Case
Lance Hammond	Adjuster	St. Paul Insurance Company adjuster
Kimberly Yi	Adjuster	AIG Insurance Company insurance adjuster
Paul F. Moon	Attorney	Cascade District Court Commissioner
J. Stansell	Attorney	prosecutor
Paul Stern	Attorney	Snohomish County Superior Court deputy prosecutor
Peter Brown	Attorney	attorney for Scott Dilworth
Bob Dawson	Attorney	Scott Dilworth civil attorney
Erik Roy	Attorney	attorney for St. Paul Insurance Company
Alan Peizer	Attorney	Christopher Church insurance defense attorney
Michael Jones	Attorney	Christopher Church criminal defense attorney
Christopher Church	Defendant	Defendant
Clay Wertheimer, M.D.	Expert--Damage	listed as witness in Snohomish County Prosecutor's File
David Barei, M.D.	Expert--Damage	Harborview Medical Center
Pamela Beaton, CPA	Expert--Damage	Scott Dilworth's CPA
Marie Gordon	Expert--Damage	Washington State Toxicology Laboratory Lab Manager
Al Frederick	Expert--Damage	PROVIDENCE--listed as witness in Snohomish County Prosecutor's File
David Kalahar, M.D.	Expert--Damage	Doctor with Cascade Rehabilitation
Ronald L. Brown, M.D.	Expert--Damage	Providence Everett Medical Center - Colby, listed

EXHIBIT 6

Full Name	Type +	Key-RKD	Role In Case
Brianne Akins	Expert--Liability	✓	Washington State Toxicology Laboratory analyst
Christopher H. Allan, M.D.	Expert--Damage	✓	Hand surgeon--Harborview
Paul Arroyos	Police	✓	Skagit County Sheriff's Department Sheriff, tended Scott Dilworth at scene
Alan Baker	Police	✓	Snohomish County Sheriff's Department's department lead investigator - detective, took photos
John Bernethy	Fact--Liability	✓	step-father of Christopher Church
Christopher Church	Defendant	✓	Defendant
Pat Connelly	Police	✓	Lynnwood Police Department, motorcycle instructor, tended Scott Dilworth at the scene.
Corey Cook	Police	✓	Officer with Snohomish Police Department
Greg Cornett	Police	✓	Lynnwood Police Department _____, wrote collision report
John Cummings	Police	✓	Snohomish County Sheriff's Department Detective, took photos of Tami Dilworth and Corey Cook at hospital.
Wayne Davis	Police	✓	Lynnwood Police Department Sargent, lead instructor
Wes Deppa	Police	✓	Lynnwood Police Department Liaison, took 10 polaroids at Harborview Medical Center
Scott Dilworth	Plaintiff	✓	plaintiff, motorcycle driver,

EXHIBIT 7

Date & Time	Fact Text	Source(s)
Tue 06/26/2007	Daryl Hansmann took the blood and entered into evidence. R.G. Oliver mailed the blood to Brianne Akins.	Alan Baker Mtg 6/26/07, Alan Baker
Wed 06/27/2007	R.G. Oliver mailed Christopher Church's blood sample by United Parcel Service to Brianne Akins.	DUI Toxicology Report [%LF%|0] Page 1

EXHIBIT 8

Date & Time	Fact Text	Fact Type +
Wed 05/01/2002 2:10 a.m. ET	100% O2 blow by. carboxyhemoglobin	Medical
Wed 05/01/2002 3:00 a.m. ET	carboxyhemoglobin level 5.5% (which would classify her as a heavy smoker)	Medical
Wed 05/01/2002 7:00 a.m. ET	suctioning for carbonaceous sputum by Carolyn Blayney, RN carboxyhemoglobin	Medical
> Wed 05/01/2002 = 3:30 a.m. ET	suctioned for scant amount of carbonaceous sputum by Julie Hueffed, RN carboxyhemoglobin	Medical
Thu 05/02/2002	care conference: "inhalation damage hasn't peaked yet, we are still suctioning carbon from her lungs, this has cleared from yesterday, but again it can be up to a week until we know the actual extent of her inhalation injury to her lungs" carboxyhemoglobin	Medical
Sat 10/26/2002	carboxyhemoglobin is formed when hemoglobin is exposed to carbon monoxide.	Medical
Sat 10/26/2002	carbon monoxide causes anoxia because the carboxyhemoglobin formed does not permit hemoglobin to combine with oxygen.	Medical
Thu 09/22/2005	carboxyhemoglobin memo by Peter Brown.	Medical
Wed 05/31/2006	Mary Sussex, RN found the carboxyhemoglobin test. The results were very high even after being on oxygen since the fire. The result was so high that it put little Emily in the "heavy smoker" category. Emily breathed a lot of smoke. Mary says we need a pulmonologist to translate this into how much smoke was inhaled, and for how long. The nursing notes also note how much black stuff was suctioned out of her lungs.	Liability
Thu 10/26/2006	should draw blood sample to do carboxyhemoglobin test before starting oxygen therapy.	Medical

EXHIBIT 9

Full Name	LS: Facts	LS: Extracts
1 Liability	348	5
1.1 Def fault	131	0
1.2 Pltf fault	32	0
1.3 Non-party fault	17	0
2 Damages--General	50	0
2.1 Parts of body injured	31	0
2.2 Pain description	3	0
2.3 Medication	2	0
2.4 Compliance with care	2	0
2.5 Permanency	0	0
2.6 Pltf's life activities	4	0
2.7 Pre-existing conditions	3	0
2.8 Consortium	2	0
3 Damages--Special	28	0
3.1 Medical bills	0	0
3.2 Wage Loss	17	0
3.3 Property Damage	0	0
4 Plaintiff credibility	15	0
5 Defendant credibility	14	0
6 Insurance	54	1

EXHIBIT 10

	Date & Time	Fact Text	Source(s)	Fact Type +	Key	Linked Issues	Staff Notes
	To Be Determined						

EXHIBIT 11