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SUPP  
NIA C. KILLEBREW, ESQ.  
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Nevada Bar No.: 00051  
GILLOCK, MARKLEY & KILLEBREW, P.C.  
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Attorneys for Plaintiffs  
Gwendolyn and Lovey Martin

**DISTRICT COURT**  
**CLARK COUNTY NEVADA**

\* \* \*

|                                  |   |  |
|----------------------------------|---|--|
| In the Matter of Endoscopy       | ) | Case No.: A558091                          |
| Center and Associated Businesses | ) | Dept.: XIX                                 |
| and Coordinated Cases            | ) |  |
|                                  | ) | Cordero et al v. Endoscopy Center of       |
|                                  | ) | Southern Nevada, et al.                    |
|                                  | ) |  |
|                                  | ) | Case No.: A558827                          |
|                                  | ) | <u>Martin et al v. Endoscopy Center of</u> |
|                                  | ) | <u>Southern Nevada et al.</u>              |

**PLAINTIFFS' SUPPLEMENT LIST OF WITNESSES AND DOCUMENTS**

Comes now Plaintiffs, GWENDOLYN AND LOVEY MARTIN, by and through attorney of record NIA KILLEBREW, ESQ. of the law firm of GILLOCK, MARKLEY & KILLEBREW and hereby supplement their witness and exhibit list as follows:

I.

**LIST OF WITNESSES**

Plaintiffs designate the following individuals as patients "A", "B" and "C" for purposes of protecting the following patients' privacy rights. These witnesses are expected to testify regarding the facts and circumstances giving rise to their care and treatment rendered at the Endoscopy Center of Southern Nevada at 700 Shadow Lane and their subsequent diagnosis of Hepatitis C, genotype 1b. These witnesses and their respective medical records strongly suggest

1 another cluster/outbreak of Hepatitis C on March 15, 2007 at the Endoscopy Center of Southern  
2 Nevada given the temporal relationship of time, place, procedures and genotype (1b) of Hepatitis  
3 C for each of these three patients.

4 1. Patient "A".

5 Patient "A" underwent a colonoscopy at approximately 9:05 a.m. by Dr. Clifford  
6 Carroll on March 15, 2007 at the Endoscopy Center of Southern Nevada, 700 Shadow Lane.  
7 Patient "A" was subsequently diagnosed with Hepatitis C genotype 1b. Patient "A" is  
8 represented by the law firm of Kemp, Harrison & Jones.

9 2. Patient "B"

10 Patient "B" underwent a colonoscopy at approximately 9:35 a.m. by Dr. Clifford  
11 Carroll and/or Dr. Dipak Desai on March 15, 2007 at the Endoscopy Center of Southern Nevada,  
12 700 Shadow Lane. Patient "B" was subsequently diagnosed with Hepatitis C genotype 1 b.  
13 Patient "B" is represented by the law firm of Mainor Eglet Cottle.

14 3. Patient "C".

15 Patient "C" underwent a colonoscopy at approximately 10:35 a.m. by Dr. Clifford  
16 Carroll on March 15, 2007 at the Endoscopy Center of Southern Nevada, 700 Shadow Lane.  
17 Patient "C" was subsequently diagnosed with Hepatitis C genotype 1b. Patient "B" is  
18 represented by the law firm of Gillock, Markley & Killebrew.

19 II.

20 LIST OF DOCUMENTS

- 21
- 22 1. Patient "A" relevant medical records in the custody of Kemp, Harrison & Jones,  
23 bates stamp numbers HKJ-(redacted)-00088-89, HKJ-(redacted)-000096-97,  
24 HKJ-(redacted)-00102, HKJ-(redacted)-00098-101, HKJ-(redacted)-00183-186.
  - 25 2. Patient "B" relevant medical records in the custody of the law firm of Mainor  
26 Eglet Cottle, bates stamp numbers (redacted)-SMAMR-MEDICAL-000051,  
27 (redacted)-SMAMR-MEDICAL-000054, (redacted)-SMAMR-MEDICAL-  
28 000061-000063, (redacted)-SMAMR-MEDICAL-000072-000074, (redacted)-  
SMAMR-MEDICAL-000087-000092, (redacted)-SMAMR-MEDICAL-000100-  
000103, (redacted)-SMAMR-MEDICAL-000158-000159, (redacted)-SMAMR-  
MEDICAL-000162, (redacted)-SMAMR-MEDICAL-000214-215, (redacted)-

1 SMAMR-MEDICAL-000268-000274, (redacted)-SMAMR-MEDICAL-000277,  
2 (redacted)-SMAMR-MEDICAL-000281-000285, and (redacted)-SMAMR-  
MEDICAL-0000287.

- 3 3. Patient "C" relevant medical records in the custody of the law firm of Gillock,  
4 Markley & Killebrew, bates stamp numbers M-(redacted)-ECSN-0001-61, M-  
5 (redacted)-GastroCenter-00001-00049, M-(redacted)-QuestDiagnostics-00034,  
00039, 00042.

6 Plaintiffs will agree to produce redacted copies of relevant medical records of patients  
7 "A", "B" and "C" referenced above following a court order ensuring patient "A", "B" and  
8 "C"'s privacy rights are protected and/or compliance with applicable HIPPA regulations.

9 Dated this 21<sup>st</sup> day of September, 2009.

10 GILLOCK, MARKLEY & KILLEBREW, P.C.

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12  
13 BY: Nia Killebrew  
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18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on the 22<sup>nd</sup> day of September, 2009, I did serve, via EFP Program  
20 and pursuant to the Court's Order filed on March 31, 2008, a copy of the foregoing  
21 PLAINTIFFS' FIRST SUPPLEMENT TO NRCP 16.1 LIST OF WITNESSES AND  
22 DOCUMENTS.

23  
24 Y. Dell  
25 An employee of GILLOCK, MARKLEY  
26 & KILLEBREW, P.C.  
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