

Deposition / Cross-Examination Prep

Case: **test-case-5-6143587d0932ce510d808ba396be34fb** · Tier: **premium** · Events: 22 · Attorney commentary: **On**

Attorney commentary mode — interpretive counsel notes explaining why chart facts matter are shown in **red** below.

1. Executive Summary

How to Use This Packet

- Step 1 — Review high-level anchors
- Step 2 — Validate source-linked corrections
- Step 3 — Walk severity-coded timeline
- Step 4 — Verify OCR anomalies
- Step 5 — Use Counsel Action Checklist
- Step 6 — Pull full Bates citations from Appendix

Rebuttal Strength Key:

- **STRONG:** Direct chart contradiction with dated source — highest deposition leverage
- **MODERATE:** Chart-backed support; corroborate with Bates-stamped exhibits
- **WEAK:** Contextual support only; verify against source PDFs before use

What this rebuttal does: This packet maps opposing expert assertions to chart-verified sources and scores rebuttal strength using deterministic chronology intelligence

What it does not do: This is not medical opinion, legal advice, or a substitute for expert review. It does not OCR-parse opposing expert reports unless counsel uploads them

How counsel should use it: Review Sections 1–7 in order, verify OCR anomalies in the sidebar, then complete the Counsel Action Checklist and Appendix citations

Counsel Interpretation Notes (Auto-Generated)

Counsel Interpretation Notes (Auto-Generated) — meaning of chart signals, not legal conclusions

- **Mechanism-of-Injury Contradiction:** The record shows 11 distinct **mechanism-of-injury** accounts found across 9 encounter(s) (e.g., **Mechanism of Injury** (MOI): Patient slipped in kitchen..., SSED APPOINTMENT Reason scheduled: Post-fall recheck after..., **Mechanism of Injury**: Pt reports falling backwards, landing...), which undermines any expert claim of a single consistent mechanism
- **PT compliance:** PT compliance is documented at 80.0% with improvement trajectory — rebutting non-compliance assertions

- **Imaging timeline:** Imaging delay signals indexed (7 row(s)) — use to rebut claims that imaging was timely or unnecessary
- **Vitals escalation:** 1 **missed** - **escalation** flag(s) indexed — rebut severity minimization

5. OCR Verification

OCR anomalies flagged for counsel verification — underlying chronology is not altered

Medication anomalies

[OCR anomaly — verify against source PDF] — non-formulary medication name detected
(01/19/2024)

[OCR anomaly — verify against source PDF] — non-formulary medication name detected
(02/18/2024)

ICD anomalies

[OCR anomaly — verify against source PDF] — non-standard ICD code
(01/19/2024)

This report does not opine on negligence, breach of the standard of care, legal causation, or witness credibility. It presents deterministic, source-linked deposition prep materials for counsel to evaluate — not expert medical or legal testimony

STANDARD 1. Witness Profile & Case Position

Witness profile assembled from chronology and sibling snapshots

Role: Counsel to designate witness role (treating provider, fact witness, corporate rep)

Treatment overview: 22 chronology events across 8 facilities

Relevant records: 26 source-linked record(s) indexed for deposition prep

Providers

- A. Nguyen, PA-C
- M. Harlan, MD
- K. Patel, MD
- R. Okonkwo, MD
- L. Cho, MD
- J. Ruiz, DPT

- S. Bernstein, MD
- Riverside Family Medicine — treating provider (name not in extract)
- Metro General Hospital — treating provider (name not in extract)
- Metro General Imaging — treating provider (name not in extract)
- Quick Care Urgent Clinic — treating provider (name not in extract)
- Mountain View Imaging Center — treating provider (name not in extract)

Facilities

- Mountain View Imaging Center
- Riverside Family Medicine
- Quick Care Urgent Clinic
- Metro General Hospital
- Metro General Imaging
- Harlan Shoulder Clinic
- Peak Motion Physical Therapy
- Metro Neuro Associates

See Encounter Registry for full encounter detail; other sections cross-link by ref id

High-level risk areas

- Multiple distinct mechanism categories referenced (fall, lifting...see Appendix for full excerpt
- EVT-02182024_ab8 — Encounter (02/18/2024) — MRI review; delayed...see Appendix for full excerpt
- EVT-03112024_667 — Encounter (03/11/2024) — Delayed neuro consult...see Appendix for full excerpt
- EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment +...see Appendix for full excerpt
- EVT-01122024_c4a — Encounter (01/12/2024) — NO-SHOW / MISSED...see Appendix for full excerpt
- ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 | Purpose: Acute...see Appendix for full excerpt
- 1 early refill(s) before 80% of prior days supply elapsed
- Elevated diversion risk from combined signals: early refills...see Appendix for full excerpt

STANDARD

2. Encounter Registry (canonical detail)

Canonical encounter index — cite once here; other sections cross-link by ref id

4. Timeline Engine

The timeline below highlights severity-coded events relevant to rebuttal themes. 7 indexed imaging delays

Timeline shows repeated Mechanism-of-Injury contradictions, multiple missed-care events, delayed imaging, abnormal vitals without documented escalation, and related care-pattern signals

Imaging Delay Events (3)

01/19/2024 — ENCOUNTER 04 — EMERGENCY Department
Visit Date: 01/19/2024 | Purpose: ED: MOI c...

 Imaging Delay

 MOI Contradiction

 OCR Anomaly

ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 | Purpose: ED: MOI **contradiction** · **vitals** non-**escalation** · ICD · **delayed** XR BATES-000004 FACILITY: Metro General Hospital — EMERGENCY DEPT...see Appendix for full excerpt

Citation: BATES-000004 — EMERGENCY Department Visit (01/19/2024)

01/19/2024 — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 | Purpose: Delayed X...

 Imaging Delay

ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 | Purpose: **Delayed** XR left shoulder (**delayed** imaging key event) BATES-000005 FACILITY: Metro General Imaging ENCOUNTER 05 — Radiology...see Appendix for full excerpt

Citation: BATES-000005 — Radiology / Imaging Report (01/19/2024)

02/05/2024 — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 | Purpose: Delayed MRI (~12 days af...

 Imaging Delay

ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 | Purpose: **Delayed** MRI (~12 days after ortho) BATES-000008 FACILITY: Mountain View Imaging Center Patient: [Name]

Citation: BATES-000008 — MRI Imaging (02/05/2024)

Missed Care (2)

01/12/2024 — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 | Purpose: NO-SHOW / MISSED...

 Missed Care

ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 | Purpose: NO-SHOW / **MISSED** APPOINTMENT (care-gap) BATES-000003 FACILITY: Riverside Family Medicine Patient: [Name]

Citation: BATES-000003 — Primary Care Office (01/12/2024)

02/22/2024 — ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 | Purpose: Missed app...

 Missed Care

Citation: BATES-000013 — Physical Therapy Progress (02/22/2024)

Abnormal Vitals (1)

01/08/2024 — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall — mild...

 Abnormal Vitals

ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not booked BATES-000002 FACILITY: Quick...see Appendix for full excerpt

Citation: BATES-000002 — Urgent Care Visit (01/08/2024)

Medication Changes (6)

01/20/2024 — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 | Purpose: CVS initial opi...

 Medication Change

ENCOUNTER 06 — **Pharmacy** Fill Record Date: 01/20/2024 | Purpose: CVS initial opioid + NSAID (days supply for early-refill math) BATES-000006 **PHARMACY** FILL / DISPENSE RECORD **Pharmacy**: CVS **Pharmacy**...see Appendix for full excerpt

Citation: BATES-000006 — Pharmacy Fill Record (01/20/2024)

02/14/2024 — ENCOUNTER 11 — Pharmacy Fill Record Date: 02/14/2024 | Purpose: Walgreens early...

 Medication Change

Citation: BATES-000011 — Pharmacy Fill Record (02/14/2024)

02/18/2024 — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review — ...

 Medication Change

 OCR Anomaly

Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024)

03/02/2024 — ENCOUNTER 15 — Pharmacy Fill Record Date: 03/02/2024 | Purpose: CVS refill — mu...

 Medication Change

Citation: BATES-000015 — Pharmacy Fill Record (03/02/2024)

03/05/2024 — ENCOUNTER 17 — Hospital Admission — Inpatient Date: 03/05/2024 | Purpose: True...

 Medication Change

Citation: BATES-000017 — Hospital Admission — Inpatient (03/05/2024)

03/20/2024 — ENCOUNTER 21 — Pharmacy Fill Record Date: 03/20/2024 | Purpose: Gabapentin star...

 Medication Change

Citation: BATES-000021 — Pharmacy Fill Record (03/20/2024)

STANDARD

2b. Source-Linked Factual Corrections

imaging (Strong)

Opposing Expert Claim: Opposing expert asserts absence of imaging or objective findings

Chart Rebuttal: ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see Appendix for full excerpt

Citation: BATES-000007 — Orthopedic Clinic (01/24/2024) Full text in Appendix.

ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic —.....see Appendix for full excerpt.

Why It Matters: This dated imaging entry directly contradicts the opposing expert's assertion

pt (Strong)

Opposing Expert Claim: Opposing expert asserts absence of **physical therapy** compliance or rehabilitation

Chart Rebuttal: ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory...see Appendix for full excerpt

Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024) Full text in Appendix.

*ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009...see...see Appendix for full excerpt.*

Why It Matters: This documented PT session directly contradicts the opposing expert's assertion

MOI (Strong)

Opposing Expert Claim: Opposing expert misstates the **mechanism of injury** or index event

Chart Rebuttal: **Mechanism of Injury** (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Citation: Urgent Care Visit (01/08/2024) Full text in Appendix.

Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Why It Matters: This conflicting mechanism-of-injury entry directly contradicts the opposing expert's assertion

Vitals (Strong)

Opposing Expert Claim: Opposing expert minimizes clinical severity despite **missed escalation** signals

Chart Rebuttal: ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see Appendix for full excerpt

Citation: BATES-000002 — Urgent Care Visit (01/08/2024) Full text in Appendix.

ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see Appendix for...see...see Appendix for full excerpt.

Why It Matters: This abnormal vitals entry directly contradicts the opposing expert's assertion

Medication (Moderate)

Opposing Expert Claim: Opposing expert asserts a stable medication course without documented changes

Chart Rebuttal: ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review · **delayed** neurology for hand tingling...see Appendix for full excerpt

Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024) Full text in Appendix.

*ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review · **delayed** neurology for hand tingling BATES-000012 Harlan...see...see Appendix for full excerpt.*

Why It Matters: This medication change directly contradicts the opposing expert's assertion

Billing (Moderate)

Opposing Expert Claim: Opposing expert characterizes billing or medical necessity inconsistently with the chart

Chart Rebuttal: CPT 99233 (DOS missing on billing extract)

Citation: Billing analysis snapshot Full text in Appendix.

CPT 99233 (DOS missing on billing extract)

Why It Matters: This billing anomaly directly contradicts the opposing expert's assertion

Opposing Expert Claim: Opposing expert characterizes billing or medical necessity inconsistently with the chart

Chart Rebuttal: CPT 11042 (DOS missing on billing extract)

Citation: Billing analysis snapshot Full text in Appendix.

CPT 11042 (DOS missing on billing extract)

Why It Matters: This billing anomaly directly contradicts the opposing expert's assertion

STANDARD

2c. Chronology QA

Chronology QA — duplicate encounters, missing data flags, out-of-order events

Missing data flags

- PT encounter 02/08/2024 — ROM not documented
- PT encounter 02/22/2024 — ROM not documented
- PT encounter 04/05/2024 — ROM not documented
- PT encounter 04/10/2024 — ROM not documented

Chronology stress

- Event on 12/15/2023 precedes prior dated entry in sort order

STANDARD

3. Top 10 Impeachment Targets

Top impeachment targets — one-page sniper list for cross-examination prep

#	Target	Ref	Why impeachable	Best question
1	Encounter (01/19/2024) — ED: MOI contradiction; vitals non-escalation; fake med/ICD; delayed XR...	EVT-01192 024_ae 1	ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 Purpose: ED: MOI contradiction; vitals...see Appendix for full excerpt	Walk me through the record entry on 01/19/2024 and explain any inconsistency
2	Encounter (02/22/2024) — Missed appointment + regression language BATES-000013 PT NOTE — Peak Motion...	EVT-02222 024_8 72	ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Purpose: Missed appointment + regression...see Appendix for full excerpt	Explain why the appointment on 02/22/2024 was missed
3	Encounter (03/11/2024) — Delayed neuro consult (~7 weeks after paresthesias) BATES-000018 FACILITY...	EVT-03112 024_6 67	ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 Purpose: Delayed neuro consult (~7 weeks after...see Appendix for full excerpt	Walk me through the record entry on 03/11/2024 and explain any inconsistency
4	Encounter (01/12/2024) — NO-SHOW / MISSED APPOINTMENT (care-gap) BATES-000003 FACILITY: Riverside...	EVT-01122 024_c4 a	ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 Purpose: NO-SHOW / MISSED APPOINTMENT (care-gap)...see Appendix for full excerpt	Explain why the appointment on 01/12/2024 was missed
5	Encounter (01/08/2024) — Index fall; mild shoulder/hip; no imaging; PCP f/u not booked BATES-000002...	EVT-01082 024_fe 8	ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall; mild shoulder/hip; no imaging; PCP...see Appendix for full excerpt	Walk me through the record entry on 01/08/2024 and explain any inconsistency
6	Encounter (01/19/2024) — Delayed XR left shoulder (delayed imaging key event) BATES-000005 FACILITY...	EVT-01192 024_b 1b	ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Purpose: Delayed XR left shoulder...see Appendix for full excerpt	Walk me through the record entry on 01/19/2024 and explain any inconsistency
7	Encounter (02/05/2024) — Delayed MRI (~12 days after ortho) BATES-000008 FACILITY: Mountain View...	EVT-02052 024_2 cb	ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Purpose: Delayed MRI (~12 days after ortho) BATES-000008...see Appendix for full excerpt	Walk me through the record entry on 02/05/2024 and explain any inconsistency

#	Target	Ref	Why impeachable	Best question
8	Encounter (02/18/2024) — MRI review; delayed neurology for hand tingling BATES-000012 Harlan Shoulder...	EVT-02182024_ab8	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand...see Appendix for full excerpt	Walk me through the record entry on 02/18/2024 and explain any inconsistency
9	Encounter (03/01/2024) — Acute flare; abnormal vitals not escalated BATES-000014 FACILITY: Quick Care...	EVT-03012024_666	ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute flare; abnormal vitals not escalated...see Appendix for full excerpt	What follow-up occurred after abnormal vitals on 03/01/2024?
10	Encounter (01/20/2024) — CVS initial opioid + NSAID (days supply for early-refill math) BATES-000006...	EVT-01202024_403	ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 Purpose: CVS initial opioid + NSAID (days supply for...see Appendix for full excerpt	Walk me through the record entry on 01/20/2024 and explain any inconsistency

STANDARD

4. Core Timeline Anchors

Timeline anchors highlight impeachment-ready dates and strategic medication signals

Encounter details appear once in the Encounter Registry; sections below reference ref id only

Key dates

- 01/08/2024
- 01/12/2024
- 01/19/2024
- 01/20/2024
- 01/24/2024
- 02/05/2024
- 02/08/2024
- 02/12/2024
- 02/14/2024
- 02/18/2024
- 02/22/2024
- 03/01/2024

Micro-anchors

- Pain regression: 5/10 → 7/10 (02/12 → 02/22/2024)
- Imaging delay: XR delayed 11.0 days (01/08/2024 → 01/19/2024)
- Imaging delay: MRI delayed 12 days (01/24/2024 → 02/05/2024)
- MOI narrative shift: account dates 01/08/2024 → 01/12/2024

Most impeachable events (8–10)

Ref	Date	Encounter	Why impeachable	Cross-link
EVT-01192024_ae1	01/19/2024	Encounter (01/19/2024) — ED: MOI contradiction; vitals non-escalation; fake med/ICD; delayed XR...	ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 Purpose: ED: MOI contradiction; vitals...see Appendix for full excerpt	Full detail: Encounter Registry EVT-01192024_ae1
EVT-02222024_872	02/22/2024		ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Purpose: Missed appointment + regression...see Appendix for full excerpt	Full detail: Encounter Registry EVT-02222024_872
EVT-03112024_667	03/11/2024		ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 Purpose: Delayed neuro consult (~7 weeks after...see Appendix for full excerpt	Full detail: Encounter Registry EVT-03112024_667
EVT-01122024_c4a	01/12/2024		ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 Purpose: NO-SHOW / MISSED APPOINTMENT (care-gap)...see Appendix for full excerpt	Full detail: Encounter Registry EVT-01122024_c4a
EVT-01082024_fe8	01/08/2024		ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall; mild shoulder/hip; no imaging; PCP...see Appendix for full excerpt	Full detail: Encounter Registry EVT-01082024_fe8
EVT-01192024_b1b	01/19/2024		ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Purpose: Delayed XR left shoulder...see Appendix for full excerpt	Full detail: Encounter Registry EVT-01192024_b1b
EVT-02052024_2 cb	02/05/2024		ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Purpose: Delayed MRI (~12 days after ortho) BATES-000008...see Appendix for full excerpt	Full detail: Encounter Registry EVT-02052024_2 cb
EVT-02182024_ab8	02/18/2024		ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand...see Appendix for full excerpt	Full detail: Encounter Registry EVT-02182024_ab8
EVT-03012024_666	03/01/2024		ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute flare; abnormal vitals not escalated...see Appendix for full excerpt	Full detail: Encounter Registry EVT-03012024_666
EVT-01202024_403	01/20/2024		ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 Purpose: CVS initial opioid + NSAID (days supply for...see Appendix for full excerpt	Full detail: Encounter Registry EVT-01202024_403

Medication deposition signals

Medication section framed for deposition strategy — not a chronological formulary list

Adherence signals

Signal	Deposition angle	Source
Medication signal	2 medication(s) filled at multiple pharmacies (max 2 facilities for one med)	Medication intelligence
Medication signal	2 medication(s) associated with multiple prescribers / provider IDs	Medication intelligence
Medication signal	1 overlapping same-medication fill interval(s)	Medication intelligence

Early refill flags

Signal	Deposition angle	Source
Medication signal	Early refill / supply-timing flag — probe adherence and prescriber instructions	Medication intelligence
Medication signal	Early refill / supply-timing flag — probe adherence and prescriber instructions	Medication intelligence
Early opioid refill	1 early refill(s) before 80% of prior days supply elapsed	medication intelligence
Early opioid refill	Elevated diversion risk from combined signals: early refills, multiple pharmacies, multiple prescribers	medication intelligence
Early refill / supply-timing flag	EVT-01202024_403 — Probe days-supply math and prescriber approval for fill on 01/20/2024	EVT-01202024_403
Early refill / supply-timing flag	EVT-02142024_3 ad — Probe days-supply math and prescriber approval for fill on 02/14/2024	EVT-02142024_3 ad

Pharmacy hopping implications

Signal	Deposition angle	Source
Multiple pharmacy sources	Pharmacy hopping implication — confirm fill locations and early refill pattern	CVS Pharmacy #4821, Walgreens #2290, CVS #4821

Change rationale gaps

Signal	Deposition angle	Source
Medication change without clear rationale	EVT-02182024_ab8 — Document medication change rationale and patient counseling	EVT-02182024_ab8

Gaps in care

- EVT-01122024_c4a — Encounter (01/12/2024) — NO-SHOW / MISSED APPOINTMENT (care-gap) BATES-000003 FACILITY...
- EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment + regression language BATES-000013 PT NOTE — Peak...

Prior conditions relevant to testimony

- {'timestamp': '01/08/2024', 'item': 'Hyperlipidemia / statin-treated', 'source document': 'BATES-000002'}
- {'timestamp': '12/15/2023', 'item': 'Chronic low back pain (lumbar strain)', 'source document': 'BATES-000001'}

STANDARD

5. Standard Question Blocks

Question blocks prioritize record-specific cross-examination prep; foundational prompts remain only as secondary scaffolding

Record-specific deposition questions

- Explain why your MOI description changed between 01/08/2024 and 01/12/2024
- Describe why neurology was not ordered despite documented paresthesias on 01/19/2024
- Explain the missed PT appointment on 02/22/2024 and subsequent regression language in the chart
- Explain how abnormal vitals on 01/08/2024 were monitored and whether escalation occurred
- Explain the documented opioid refill timing and whether you took medication exactly as prescribed

Incident & treatment foundation

- Describe the incident and symptom onset in chronological order
- Identify each major treatment encounter after the incident date

Billing follow-up (from billing intelligence)

- Do not treat figures as deposition-ready until billing QA gate passes (alias/OCR remediation)
- Confirm whether same-day E/M + procedure notes support modifier -25
- Reconcile missing ICD lines against operative/office notes
- Ask billing custodian for fee schedule / remittance advice for variance lines

STANDARD

6. Standard Impeachment Flags

Standard impeachment flags from MOI contradictions, gaps, and adherence signals

See Encounter Registry for full encounter text; flags below are cross-linked summaries.

Flag	Detail	Source
MOI / mechanism inconsistency	Multiple distinct mechanism categories referenced (fall, lifting strain); resolved via Hierarchy of Reliability (Intake Notes > Initial ED Notes > Subsequent Progress Notes) — "fall" (Initial ED Note) is treated as the Primary MOI, with 1 secondary account(s) listed for counsel review rather than silently discarded	
PT / rehabilitation documented	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009 ==== PT EVAL / OUTPT REHAB ==== Facility: Peak Motion Physical Therapy Date of Service: 02/08/2024 Pt: [Name] Therapist: J. Ruiz, DPT...	BATES-000009 · Physical Therapy Evaluation (02/08/2024)
Medication change / adherence signal	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand tingling BATES-000012 Harlan Shoulder Clinic — FOLLOW-UP Visit Date: 02/18/2024 Patient: [Name]	BATES-000012 · Orthopedic Follow-up (02/18/2024)
Missing baseline / pre-injury records	Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis	
MMI / return-to-work language documented	ENCOUNTER 23 — Physical Therapy Progress — Plateau / MMI path Date: 04/05/2024 Purpose: PT plateau language for MMI/RTW BATES-000023 Peak Motion Physical Therapy — PROGRESS DOS: 04/05/2024 Patient: [Name]	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)
Objective imaging documented	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	BATES-000007 · Orthopedic Clinic (01/24/2024)

Flag	Detail	Source
Record inconsistency or adherence issue	ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 Purpose: NO-SHOW / MISSED APPOINTMENT (care-gap) BATES-000003 FACILITY: Riverside Family Medicine Patient: [Name]	BATES-000003 · Primary Care Office (01/12/2024)
Record inconsistency or adherence issue	ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Purpose: Missed appointment + regression language BATES-000013 PT NOTE — Peak Motion Date: 02/22/2024 Pt: [Name] — L shldr Scheduled session: MISSED APPOINTMENT — patient no-show 02/29 originally rebooked to...	BATES-000013 · Physical Therapy Progress (02/22/2024)

STANDARD

7. Standard Exhibits List

Exhibits list from unified chronology, medical chronology, and sibling document indexes

Category	Exhibit	Date
PCP notes	BATES-000001 · Primary Care — Pre-Existing (12/15/2023)	12/15/2023
PCP notes	BATES-000002 · Urgent Care Visit (01/08/2024)	01/08/2024
PCP notes	BATES-000003 · Primary Care Office (01/12/2024)	01/12/2024
ER notes	BATES-000004 · EMERGENCY Department Visit (01/19/2024)	01/19/2024
Key record	BATES-000005 · Radiology / Imaging Report (01/19/2024)	01/19/2024
Pharmacy log	BATES-000006 · Pharmacy Fill Record (01/20/2024)	01/20/2024
Imaging	BATES-000007 · Orthopedic Clinic (01/24/2024)	01/24/2024
Imaging	BATES-000008 · MRI Imaging (02/05/2024)	02/05/2024
PT notes	BATES-000009 · Physical Therapy Evaluation (02/08/2024)	02/08/2024
PT notes	BATES-000010 · Physical Therapy Progress (02/12/2024)	02/12/2024
Pharmacy log	BATES-000011 · Pharmacy Fill Record (02/14/2024)	02/14/2024
Imaging	BATES-000012 · Orthopedic Follow-up (02/18/2024)	02/18/2024
PT notes	BATES-000013 · Physical Therapy Progress (02/22/2024)	02/22/2024
Key record	BATES-000014 · Urgent Care Visit (03/01/2024)	03/01/2024
Pharmacy log	BATES-000015 · Pharmacy Fill Record (03/02/2024)	03/02/2024
Key record	BATES-000017 · Hospital Admission — Inpatient (03/05/2024)	03/05/2024
Key record	BATES-000018 · Neurology Consult (03/11/2024)	03/11/2024
Imaging	BATES-000019 · EMG / Nerve Study (03/15/2024)	03/15/2024
Imaging	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)	03/18/2024
Pharmacy log	BATES-000021 · Pharmacy Fill Record (03/20/2024)	03/20/2024
PT notes	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)	04/05/2024

Category	Exhibit	Date
PT notes	BATES-000024 · Orthopedic MMI / RTW Summary (04/10/2024)	04/10/2024
Chronology index	Case chronology (22 events)	
Key record	Deviation of Care snapshot (rule findings)	
Key record	RITA_Reference_So C_Manual_Sepsis_STEMI	
Key record	RITA_Synthetic_Full Case_[Name].json	

STANDARD 8. Counsel-Facing Summary

Counsel-facing summary: use the witness profile and timeline anchors to structure direct/cross preparation. Standard impeachment flags highlight record-vs-testimony areas to probe without deep forensic analysis

- **Witness coverage: 12 named provider(s) across 8 facilities; 26 source-linked record(s) indexed**
- **Timeline anchors: 12 key dates; 2 care-gap signals**
- **Impeachment flags: 8 standard flags identified**

STANDARD 9. Counsel Strategy Notes

Organizational deposition-prep themes derived from the medical record — not legal advice, case strategy, or expert opinion

Counsel strategy notes — structural prep guidance, not legal advice

- **This witness tends to contradict themselves on mechanism of injury**
- **This witness may minimize missed appointments and adherence gaps**
- **This witness has poor recall of medication adherence and refill timing**
- **This witness may struggle to explain delayed neurology follow-up despite sensory symptoms**
- **This witness may downplay abnormal vitals and whether escalation occurred**

STANDARD 10. Yes/No Trap Questions

Yes/No trap questions — short cross-examination prompts derived from record signals

- **Isn't it true your mechanism-of-injury description on 01/12/2024 conflicted with what you reported on 01/08/2024?**
- **Isn't it true you missed the appointment documented on 02/22/2024?**
- **Isn't it true neurology was recommended but not ordered despite paresthesias on 02/18/2024?**
- **Isn't it true an opioid refill occurred earlier than the documented days-supply would allow?**
- **Isn't it true abnormal vitals were documented on 01/08/2024 without documented escalation?**

STANDARD 11. Counsel Strategy Hooks

Organizational deposition-prep themes derived from the medical record — not legal advice, case strategy, or expert opinion

Counsel strategy hooks — organizational prep themes, not legal advice

Theme	Prep hook	Record hint
Mechanism of injury	Clarify MOI inconsistencies before opposing counsel exploits them	causation analysis.moi summary
Attendance / adherence	Prepare witness to address missed appointments and regression language with dated context	Chronology missed-care signals
Continuity of care	Walk through care-gap intervals chronologically before cross-examination explores non-compliance	Gap sheet / chronology
Medication adherence	Prepare witness to explain pharmacy refill timing and prescriber instructions	medication intelligence
Clinical escalation	Prepare witness to explain how abnormal vitals were monitored and whether escalation occurred	BATES-000002 · Urgent Care Visit (01/08/2024)
Specialist follow-up	Prepare witness to explain neurology referral timing and interim symptom management	BATES-000012 · Orthopedic Follow-up (02/18/2024)
Record completeness	Identify documentation gaps counsel may need to cure or explain before deposition	BATES-000013 · Physical Therapy Progress (02/22/2024)

STANDARD 12. Witness Vulnerability Map

Organizational deposition-prep themes derived from the medical record — not legal advice, case strategy, or expert opinion

Witness vulnerability map — topic, why vulnerable, and best question to expose it

Risk tier	Topic	Why vulnerable	Best question	Ref
high	Inconsistent MOI	Multiple distinct mechanism categories referenced (fall, lifting strain); resolved via...see Appendix for full excerpt	Explain why your mechanism-of-injury description changed on the referenced dates	
high	Regression worsening language	ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute flare; abnormal...see Appendix for full excerpt	Walk me through the record entry on 03/01/2024 and explain any inconsistency	
high	Missed appointment	EVT-01122024_c4a — Encounter (01/12/2024) — NO-SHOW / MISSED...see Appendix for full excerpt	Explain why the appointment on 01/12/2024 was missed	EVT-01122024_c4a
high	Missed PT session	EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment +...see Appendix for full excerpt	Explain the missed PT session on 02/22/2024	EVT-02222024_872
high	Early opioid refill / pharmacy signal	1 early refill(s) before 80% of prior days supply elapsed	Were you taking medication exactly as prescribed before the early refill?	
high	Early opioid refill / pharmacy signal	Elevated diversion risk from combined signals: early refills, multiple pharmacies, multiple prescribers	Were you taking medication exactly as prescribed before the early refill?	
moderate	Abnormal vitals without	EVT-01082024_fe8 — Encounter (01/08/2024) — Index fall; mild...see Appendix for full excerpt	What follow-up occurred after abnormal vitals on 01/08/2024?	EVT-01082024_fe8

Risk tier	Topic	Why vulnerable	Best question	Ref
	documented escalation			
moderate	Delayed neurology consult	EVT-02182024_ab8 — Encounter (02/18/2024) — MRI review; delayed...see Appendix for full excerpt	Why was neurology not ordered when paresthesias were documented on 02/18/2024?	EVT-02182024_ab8
moderate	Delayed neurology consult	EVT-03112024_667 — Encounter (03/11/2024) — Delayed neuro consult...see Appendix for full excerpt	Why was neurology not ordered when paresthesias were documented on 03/11/2024?	EVT-03112024_667
moderate	Documentation gap signal	EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment +...see Appendix for full excerpt	Were you aware the chart documents a documentation gap on this date?	EVT-02222024_872
low	Consistent pain documentation	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval +...see Appendix for full excerpt	Walk me through the record entry on 02/08/2024 and explain any inconsistency	
low	Consistent pain documentation	ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Purpose: Session improvement...see Appendix for full excerpt	Walk me through the record entry on 02/12/2024 and explain any inconsistency	

STANDARD 13. Defense Likely Lines of Attack

Organizational deposition-prep themes derived from the medical record — not legal advice, case strategy, or expert opinion

Defense likely lines of attack — pattern recognition from the record, not legal conclusions

Likely attack line	Record signal	Date	Source
Inconsistent MOI	Multiple distinct mechanism categories referenced (fall, lifting...see Appendix for full excerpt		causation analysis.moi summary
Care gaps / treatment gaps	ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute...see Appendix for full excerpt	03/01/2024	BATES-000014 · Urgent Care Visit (03/01/2024)
Missed appointments	EVT-01122024_c4a — Encounter (01/12/2024) — NO-SHOW / MISSED...see Appendix for full excerpt	01/12/2024	BATES-000003 · Primary Care Office (01/12/2024)
Early opioid refill	1 early refill(s) before 80% of prior days supply elapsed		medication intelligence
Early opioid refill	Elevated diversion risk from combined signals: early refills...see Appendix for full excerpt		medication intelligence
Lack of escalation for abnormal vitals	EVT-01082024_fe8 — Encounter (01/08/2024) — Index fall; mild...see Appendix for full excerpt	01/08/2024	BATES-000002 · Urgent Care Visit (01/08/2024)
Delayed neurology consult	EVT-02182024_ab8 — Encounter (02/18/2024) — MRI review; delayed...see Appendix for full excerpt	02/18/2024	BATES-000012 · Orthopedic Follow-up (02/18/2024)
Delayed neurology consult	EVT-03112024_667 — Encounter (03/11/2024) — Delayed neuro consult...see Appendix for full excerpt	03/11/2024	BATES-000018 · Neurology Consult (03/11/2024)

Likely attack line	Record signal	Date	Source
Missed PT sessions	EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment +...see Appendix for full excerpt	02/22/2024	BATES-000013 · Physical Therapy Progress (02/22/2024)
Documentation gaps	EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment +...see Appendix for full excerpt	02/22/2024	BATES-000013 · Physical Therapy Progress (02/22/2024)
MMI / return-to-work plateau language	EVT-02182024_ab8 — ENCOUNTER 12 — Orthopedic Follow-up Date...see Appendix for full excerpt	02/18/2024	BATES-000012 · Orthopedic Follow-up (02/18/2024)
MMI / return-to-work plateau language	EVT-04052024_593 — ENCOUNTER 23 — Physical Therapy Progress —...see Appendix for full excerpt	04/05/2024	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)

STANDARD 14. Plaintiff Rehabilitation Opportunities

Organizational deposition-prep themes derived from the medical record — not legal advice, case strategy, or expert opinion

Plaintiff rehabilitation opportunities — factual anchors to stabilize testimony, not argument

Factual anchor	Record basis	Date	Source
Consistent pain documentation	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009 ===== PT EVAL / OUTPT REHAB ===== Facility: Peak Motion Physical Therapy Date of Service: 02/08/2024 Pt: [Name] Therapist: J. Ruiz, DPT...	02/08/2024	BATES-000009 · Physical Therapy Evaluation (02/08/2024)
Consistent pain documentation	ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Purpose: Session improvement BATES-000010 Peak Motion Physical Therapy — PROGRESS NOTE DOS: 02/12/2024 Patient: [Name]	02/12/2024	BATES-000010 · Physical Therapy Progress (02/12/2024)
Consistent pain documentation	ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Purpose: Missed appointment + regression language BATES-000013 PT NOTE — Peak Motion Date: 02/22/2024 Pt: [Name] — L shldr Scheduled session: MISSED APPOINTMENT — patient no-show 02/29 originally rebooked to...	02/22/2024	BATES-000013 · Physical Therapy Progress (02/22/2024)
Objective MRI / imaging findings	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	01/24/2024	BATES-000007 · Orthopedic Clinic (01/24/2024)
Objective MRI / imaging findings	ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Purpose: Delayed MRI (~12 days after ortho) BATES-000008 FACILITY: Mountain View Imaging Center Patient: [Name]	02/05/2024	BATES-000008 · MRI Imaging (02/05/2024)
Objective MRI / imaging findings	ENCOUNTER 17 — Hospital Admission — Inpatient Date: 03/05/2024 Purpose: True hospitalization admit/LOS/procedure/discharge BATES-000017 FACILITY: Metro General Hospital — INPATIENT Patient: [Name]	03/05/2024	BATES-000017 · Hospital Admission — Inpatient (03/05/2024)

Factual anchor	Record basis	Date	Source
Objective MRI / imaging findings	ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 Purpose: Delayed neuro consult (~7 weeks after paresthesias) BATES-000018 FACILITY: Metro Neuro Associates Consult Date: 03/11/2024 Patient: [Name]	03/11/2024	BATES-000018 · Neurology Consult (03/11/2024)
Objective MRI / imaging findings	ENCOUNTER 20 — MRI Hip (Out-of-Order Date Stress) Date: 03/18/2024 Purpose: Hip MRI dated after shoulder saga (chronology ordering stress) BATES-000020 FACILITY: Mountain View Imaging Center Patient: [Name]	03/18/2024	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)
PT improvement trajectory	ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Purpose: Session improvement BATES-000010 Peak Motion Physical Therapy — PROGRESS NOTE DOS: 02/12/2024 Patient: [Name]	02/12/2024	BATES-000010 · Physical Therapy Progress (02/12/2024)
PT improvement trajectory	ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Purpose: Missed appointment + regression language BATES-000013 PT NOTE — Peak Motion Date: 02/22/2024 Pt: [Name] — L shldr Scheduled session: MISSED APPOINTMENT — patient no-show 02/29 originally rebooked to...	02/22/2024	BATES-000013 · Physical Therapy Progress (02/22/2024)
Return-to-work restrictions	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	01/24/2024	BATES-000007 · Orthopedic Clinic (01/24/2024)

Standard turnaround: 5–7 business days
Standard QA: Standard Veri Lumin DRE + workflow QA
Premium turnaround: 3–5 business days
Premium QA: Premium depth + expanded source checks
Data sources: chronology, billing, causation, damages, deviation, medical chronology, merit, pre existing, treatment timeline

PREMIUM

1. Discovery Gap & Defense-Exposure Inventory

Discovery gap and defense-exposure inventory from causation limitations, deviation, and billing QA — these are record gaps or strategic exposures, not established chart contradictions

Record anchor	Gap area	Gap / exposure	Defense framing	Mitigation
Clinical chronology	Mechanism-of-Injury Consistency	11 distinct mechanism-of-injury accounts found across 9 encounter(s) — resolve with counsel / treating provider before relying on a single MOI	Defense will highlight MOI contradictions to attack credibility and argue that any later diagnosis cannot be reliably linked to a single industrial event	Reconcile competing MOI accounts via Hierarchy of Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers
Clinical	Documentation	1 documentation-gap event(s) flagged in the causation	Defense will argue the chart is incomplete and that missing notes	Issue record requests / subpoenas for: 02/22/2024 (unspecified facility):

Record anchor	Gap area	Gap / exposure	Defense framing	Mitigation
chronology	Completeness	timeline	prevent reliable causation / deviation analysis — and may imply the gaps favor the defense narrative	Timely order / performance of indicated care
Clinical chronology	Medication-Causation Intelligence	Medication premium intelligence not available for this case	Defense will challenge any medication-related causation theory as unsupported by chart intelligence	Enable medication premium enrichment / causation maps for pharmacology-linked theories
Clinical chronology	Baseline / Pre-Existing Medical Records	Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis	Defense will argue any impairment is entirely pre-existing / degenerative and that apportionment cannot be performed without a documented pre-injury baseline	Subpoena pre-injury primary-care / specialty records for the 2–5 years preceding 12/15/2023 (or longer if chronic conditions are alleged)

PREMIUM

2. Mechanism-of-Injury Alignment

Mechanism-of-injury alignment loaded from causation premium snapshot: but for causation analysis, aggravation vs new injury, differential etiology. Counterfactual and triage framing requires expert corroboration

But-For Causation Analysis

- [01/08/2024] But for "Contusion" (strength: moderate), the downstream deterioration/harm pathway documented in the chart may not have occurred as recorded — counterfactual framing only, not a certainty determination (confidence: moderate)

Requires Expert Clinical Correlation: heuristic causal-strength signals were found, but no citation-grounded causal chain reached high confidence

Counterfactual framing for attorney argument development — requires expert corroboration before use in a filing or testimony

Aggravation vs. New Injury Analysis

Grounded

Classification: **delayed diagnosis possible aggravation or progression**

Earliest MOI encounter: 01/08/2024 · **Initial diagnosis:** 01/19/2024 · **Days between:** 11

Pre-existing condition references

When	Excerpt	Source
03/01/2024	ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute flare; abnormal vitals not escalated BATES-000014 FACILITY: Quick Care Urgent Clinic Visit Date: 03/01/2024 Patient: [Name]	Urgent Care Visit (03/01/2024)

When	Excerpt	Source
12/15/2023	ENCOUNTER 01 — Primary Care — Pre-Existing Date: 12/15/2023 Purpose: Pre-index chronic LBP (pre-existing condition module) BATES-000001 FACILITY: Riverside Fam	Primary Care — Pre-Existing (12/15/2023)

Timing comparison is deterministic date arithmetic only — whether this represents a new injury vs. acute aggravation of a pre-existing condition requires expert medical review

Differential Etiology Module

Grounded

Physician triage tool — not a diagnostic determination. Rule-Out Probability disclaimer: competing-diagnosis pairings and rule-in / rule-out candidates are a physician triage screen for chart review — not a diagnostic determination, probability of diagnosis, or medical opinion. This module does not establish or exclude disease. A reviewing physician / retained medical expert must independently confirm or reject each candidate before any clinical or medicolegal use

Grounded clinical findings

Finding	Body region	Source
No acute fracture. Mild AC joint osteoarthritis. Soft tissue swelling	LEFT SHOULDER	RITA_Synthetic_Full Case_[Name].json
Partial-thickness bursal-sided tear of supraspinatus (~8 mm), Mild subacromial bursitis, Intact labrum; no full-thickness tear, AC joint: mild OA (aligns...	LEFT SHOULDER WITHOUT CONTRAST	RITA_Synthetic_Full Case_[Name].json
partial bursal-sided SST tear	shoulder	RITA_Synthetic_Full Case_[Name].json
no acute intracranial hemorrhage. Correlate clinically	head noncontrast	RITA_Synthetic_Full Case_[Name].json
Mild trochanteric bursitis. No fracture. Labrum intact	RIGHT HIP WITHOUT CONTRAST	RITA_Synthetic_Full Case_[Name].json

Pre-existing / comorbidity context

Use with aggravation vs. new injury timing when framing deposition questions.

Diagnoses

When	Finding	Source
12/15/2023	Chronic low back pain (lumbar strain)	BATES-000001

Chronic conditions

When	Finding	Source
01/08/2024	Hyperlipidemia / statin-treated	BATES-000002
12/15/2023	Chronic low back pain (lumbar strain)	BATES-000001

Relevant past injuries

When	Finding	Source
12/15/2023	Chronic low back pain (lumbar strain)	BATES-000001

Medication summary

Chronic / home medications

Medication	First documented	Source
Lisinopril (chronic)	01/08/2024	BATES-000002
Atorvastatin (chronic)	01/08/2024	BATES-000002
Ibuprofen	01/08/2024	BATES-000002
Hydrocodone (acute/pain)	01/24/2024	BATES-000007
Ketorolac/Toradol (acute)	03/01/2024	BATES-000014

Acute / incident-period medications

Medication	First documented	Source
Ketorolac/Toradol (acute)	01/19/2024	BATES-000004
Hydrocodone (acute/pain)	01/20/2024	BATES-000006
Ibuprofen	01/20/2024	BATES-000006
Cyclobenzaprine	02/14/2024	BATES-000011
Gabapentin	03/20/2024	BATES-000021

Polypharmacy patterns

- Multiple concurrent medications documented (10 unique entries)
- Opioid / acute pain medication use documented in chronology

Prior functional limitations

When	Finding	Source
01/19/2024	EMERGENCY Department Visit — ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 Purpose: ED: MOI contradiction	BATES-000004
02/08/2024	Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-ses	BATES-000009
04/10/2024	Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 Purpose: MMI reached; retu	BATES-000024

PREMIUM

3. Premium Question Blocks

Strategic premium question blocks with if-say/respond-with framing

Category	If they say...	Respond with...
Causation / timeline challenge	Limitation leveraged: Mechanism-of-Injury Consistency	Opposing counsel will argue: Defense will highlight MOI contradictions to attack credibility and argue that any later diagnosis cannot be reliably linked to a single industrial event. Mitigation: Reconcile competing MOI accounts via Hierarchy of Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers
Causation / timeline challenge	Limitation leveraged: Documentation Completeness	Opposing counsel will argue: Defense will argue the chart is incomplete and that missing notes prevent reliable causation / deviation analysis — and may imply the gaps favor the defense narrative. Mitigation: Issue record requests / subpoenas for: 02/22/2024 (unspecified facility): Timely order / performance of indicated care
Causation / timeline challenge	Limitation leveraged: Medication-Causation Intelligence	Opposing counsel will argue: Defense will challenge any medication-related causation theory as unsupported by chart intelligence. Mitigation: Enable medication premium enrichment / causation maps for pharmacology-linked theories
Causation / timeline challenge	Limitation leveraged: Baseline / Pre-Existing Medical Records	Opposing counsel will argue: Defense will argue any impairment is entirely pre-existing / degenerative and that apportionment cannot be performed without a documented pre-injury baseline. Mitigation: Subpoena pre-injury primary-care / specialty records for the 2–5 years preceding 12/15/2023 (or longer if chronic conditions are alleged)
Causation / timeline challenge	Pre-existing condition / natural progression	Review the Aggravation vs. New Injury module and clinical-course timeline for acute-onset markers distinguishing aggravation from baseline disease; obtain complete pre-injury records for apportionment
Billing necessity questions	Charges were appropriate	Do not treat figures as deposition-ready until billing QA gate passes (alias/OCR remediation)
Billing necessity questions	Charges were appropriate	Confirm whether same-day E/M + procedure notes support modifier -25
Billing necessity questions	Charges were appropriate	Reconcile missing ICD lines against operative/office notes
Billing necessity questions	Charges were appropriate	Ask billing custodian for fee schedule / remittance advice for variance lines

PREMIUM

4. Premium Impeachment Package

Premium impeachment package from damages cross-exam, medication, and billing signals

Impeachment vector	Counsel response	Records to cure
Medication signal	2 medication(s) filled at multiple pharmacies (max 2 facilities for one med)	
Medication signal	2 medication(s) associated with multiple prescribers / provider IDs	
Medication signal	1 overlapping same-medication fill interval(s)	
Medication signal	1 early refill(s) before 80% of prior days supply elapsed	
Medication signal	Elevated diversion risk from combined signals: early refills, multiple pharmacies, multiple prescribers	

PREMIUM

5. Premium Exhibits Package

Premium exhibits package with suggested order and use

Order	Exhibit	Suggested use
1	BATES-000001 · Primary Care — Pre-Existing (12/15/2023)	Impeachment
2	BATES-000002 · Urgent Care Visit (01/08/2024)	Impeachment
3	BATES-000003 · Primary Care Office (01/12/2024)	Impeachment
4	BATES-000004 · EMERGENCY Department Visit (01/19/2024)	Causation / timeline
5	BATES-000005 · Radiology / Imaging Report (01/19/2024)	Causation / timeline
6	BATES-000006 · Pharmacy Fill Record (01/20/2024)	Causation / timeline
7	BATES-000007 · Orthopedic Clinic (01/24/2024)	Causation / timeline
8	BATES-000008 · MRI Imaging (02/05/2024)	Causation / timeline
9	BATES-000009 · Physical Therapy Evaluation (02/08/2024)	Causation / timeline
10	BATES-000010 · Physical Therapy Progress (02/12/2024)	Causation / timeline
11	BATES-000011 · Pharmacy Fill Record (02/14/2024)	Causation / timeline
12	BATES-000012 · Orthopedic Follow-up (02/18/2024)	Causation / timeline
13	BATES-000013 · Physical Therapy Progress (02/22/2024)	Causation / timeline
14	BATES-000014 · Urgent Care Visit (03/01/2024)	Causation / timeline
15	BATES-000015 · Pharmacy Fill Record (03/02/2024)	Causation / timeline
16	BATES-000017 · Hospital Admission — Inpatient (03/05/2024)	Causation / timeline
17	BATES-000018 · Neurology Consult (03/11/2024)	Causation / timeline
18	BATES-000019 · EMG / Nerve Study (03/15/2024)	Causation / timeline
19	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)	Causation / timeline
20	BATES-000021 · Pharmacy Fill Record (03/20/2024)	Causation / timeline
21	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)	Causation / timeline

Order	Exhibit	Suggested use
22	BATES-000024 · Orthopedic MMI / RTW Summary (04/10/2024)	Causation / timeline
23	Case chronology (22 events)	Causation / timeline
24	Deviation of Care snapshot (rule findings)	Causation / timeline
25	RITA_Reference_So C_Manual_Sepsis_STEMI	Causation / timeline

PREMIUM

6. Premium Counsel Strategy Memo

Premium counsel strategy memo — tactical framing for deposition

box them in: Anchor testimony to dated encounters in the witness profile and timeline anchors. Use exhibits in chronological order before exploring contradictions

avoid traps: Do not assume deposition-grade billing claims unless billing QA passed. Treat MOI conflicts as exploration areas, not conclusions

expose contradictions: Discovery-gap rows available: 5. Lead with record citations before characterizing inconsistency; gaps are not established contradictions

frame causation: Use mechanism-of-injury alignment modules to separate aggravation vs new injury and alternative-cause exposure

use exhibits: Open with core records (ER, imaging, PCP, PT, pharmacy), then deploy highlighted impeachment exhibits after foundation is laid

priority risk areas: Multiple distinct mechanism categories referenced (fall, lifting...see Appendix for full excerpt; EVT-02182024_ab8 — Encounter (02/18/2024) — MRI review; delayed...see Appendix for full excerpt; EVT-03112024_667 — Encounter (03/11/2024) — Delayed neuro consult...see Appendix for full excerpt; EVT-02222024_872 — Encounter (02/22/2024) — Missed appointment + ...see Appendix for full excerpt; EVT-01122024_c4a — Encounter (01/12/2024) — NO-SHOW / MISSED...see Appendix for full excerpt; ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 | Purpose: Acute...see Appendix for full excerpt; 1 early refill(s) before 80% of prior days supply elapsed; Elevated diversion risk from combined signals: early refills...see Appendix for full excerpt

causation modules loaded: but for causation analysis; aggravation vs new injury; differential etiology

PREMIUM

7. Risk & Exposure Dashboard

60

Medical risk

100

Legal exposure

80

Causation strength

improving

Damages trajectory

Risk & exposure dashboard — heuristic scores for counsel strategy, not legal conclusions

QUALITY ASSURANCE: WARN — PROVISIONAL

RITA V1.3.1 - QA Warn (Provisional) · Protocol v1.3.1 · Generated 2026-08-02T19:41:45+00:00

QA checks flagged 1 issue(s), or billing QA is provisional. Review before relying on this report in litigation deliverables.

- Billing Analysis QA gate status=warn. Closing banner must remain provisional — not VERIFIED.
- Pod billing: upstream billing_qa_gate=warn. Certification cannot be VERIFIED.

Pod billing · ledger sha256:23db6105 · quality=provisional · qa_gate=warn