

STATE OF MICHIGAN

IN THE CIRCUIT COURT OF THE COUNTY OF GENESEE

AMY RYGWELSKI,

Plaintiff,

Case No. 17-108779-NM

v.

HON. GEOFFREY L. NEITHERCUT

LAURA CASTLEMAN, M.D.,  
M. RODRIGUEZ, H.C.A.,  
HAROLETTA M. LILLY, W.H.N.P.-B.C.,  
D. DURBROW, H.C.S.,  
S. BOSTON, H.C.M.,  
M. KINT, N.P., and  
PLANNED PARENTHOOD MID AND  
SOUTH MICHIGAN,  
jointly and severally,

Defendants.

**A TRUE COPY**  
Genesee County Clerk

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Danielle L. Dezbor (P79488)  
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[pnystrom@dykema.com](mailto:pnystrom@dykema.com)  
[ngavrilovic@dykema.com](mailto:ngavrilovic@dykema.com)

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GENESEE COUNTY CLERK

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**DEFENDANTS' TRIAL WITNESS LIST**

Defendants Planned Parenthood Mid and South Michigan, Dr. Laura Castleman, Marilou Rodriguez, Haroletta Marie Lilly, Sabrina Boston, Darci (Durbrow) Morgan and Mary (Kint) Petit, ("Defendants") through her attorneys, Dykema Gossett PLLC, submit the following list of witnesses that may be called to testify at the trial of this matter:

1. Dr. Laura Castleman

2. Marilou Rodriguez
3. Haroletta Marie Lilly
4. Sabrina Boston
5. Darci (Durbrow) Morgan
6. Mary (Kint) Petit
7. Amy Rygwelski
8. Frederick Presswood
9. Any and all family members of Frederick Presswood, including, but not limited to, Bethany Presswood
10. Any and all children of Frederick Presswood, including, but not limited to, Ashleigh King
11. Mona Hardas, MD
12. Samasandrapalya Kiran, MD
13. Mike Nance
14. Trudy Massey
15. Rebecca Jenkinson
16. Amy Fowlkes
17. Marc Rygwelski
18. Any and all other family members of Plaintiffs
19. Chief Raymond Barton, Flint Fire Department
20. District Commander Ramsey Clapper, Flint Fire Department
21. Lt. Mark Stratman, Flint Fire Department
22. Michael Hertz, MD
23. Jennifer Smith, DO
24. Any and all treating physicians of Plaintiffs, including, but not limited to any and all doctors Plaintiffs treated with prior to and since the alleged incident
25. Supervisors, payroll personnel, co-workers, employees, and/or anyone associated with the Plaintiff

26. Any and all current and former agents, employees, physicians, designated representatives, designated corporate representatives, or keeper of the records of the following:

- a. Planned Parenthood, including:
  - i. Tom Gannon
  - ii. Diane Scully
- b. Mona Hardas, MD
- c. Samasandrapalya Kiran, MD
- d. Flint Fire Department
- e. Northland Family Planning Centers-Sterling Heights including L. Donnine, Kate Castro, Tania (last name unknown)

27. Planned Parenthood reserves the right to call the following experts:

- a. Caron W. Jones, MSN, CNM, FNP (expertise in nurse practitioner, misoprostol use, diagnosis and treatment, standard of care, obstetrics and gynecology)
- b. Gregory Chen, M.D. (expertise in obstetrics and gynecology, pregnancy, abortion, standard of care)

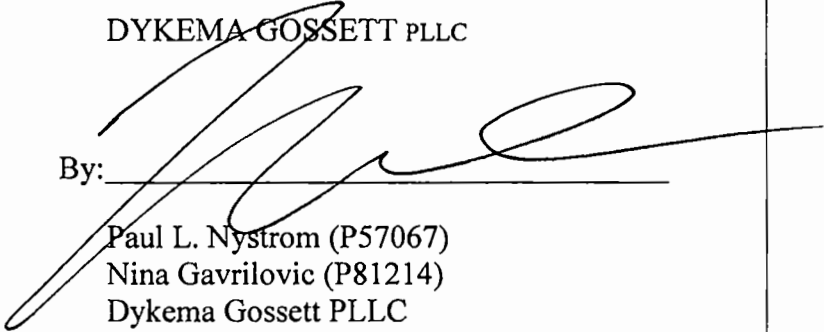
28. All witnesses deposed, identified in depositions and identified in discovery responses

29. All witness listed by other parties

Defendants reserve the right to amend this witness list to name additional lay and expert witnesses as necessitated through investigation and discovery, which are ongoing and incomplete.

DYKEMA GOSSETT PLLC

By: \_\_\_\_\_

  
Paul L. Nystrom (P57067)  
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Dykema Gossett PLLC  
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[ngavrilovic@dykema.com](mailto:ngavrilovic@dykema.com)

Dated: February 26, 2018

**PROOF OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause at their respective addresses disclosed on the pleadings on February 26, 2018 by:

- U.S. Mail
- Hand Delivered
- Federal Express
- Other \_\_\_\_\_
- Facsimile
- Overnight Courier
- E-Mail

Signature: \_\_\_\_\_

*Nancy Doman*

Nancy Doman

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S. BOSTON, H.C.M.,  
M. KINT, N.P., and  
PLANNED PARENTHOOD MID AND  
SOUTH MICHIGAN,  
jointly and severally,

Defendants.

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**DEFENDANTS' TRIAL EXHIBIT LIST**

Defendants, through their attorneys, Dykema Gossett PLLC, submit the following list of exhibits that may be entered into evidence at the trial of this matter:

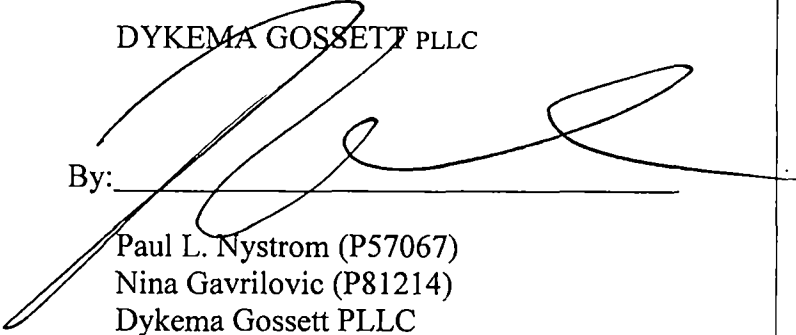
1. Plaintiff's medical records from Planned Parenthood
2. Plaintiff's medical records from Northland Family Planning Centers-Sterling Heights
3. Plaintiff's medical records from Mona Hardas, MD

4. Plaintiff's medical records from Samasandrapalya Kiran, MD
5. Plaintiff's employment records from Flint Fire Department
6. Plaintiff's social media accounts, including, but not limited to, her Facebook page
7. Frederick Presswood's social media accounts, including, but not limited to, his Facebook page
8. Records of all entities identified on Plaintiff's Witness List and Exhibit List
9. Documents produced in discovery
10. Exhibits identified by Plaintiff
11. Any and all Curriculum Vitae and reports prepared by experts
12. Trial exhibits prepared by Defendants' experts
13. Deposition exhibits
14. All other medical records of Plaintiff
15. All correspondence between Plaintiff and Fred Presswood
16. All documents relating to Plaintiff's pregnancies

Defendants reserve the right to amend this exhibit list to identify additional exhibits as necessitated through investigation and discovery, which are ongoing and incomplete.

DYKEMA GOSSETT PLLC

By: \_\_\_\_\_


  
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Dykema Gossett PLLC  
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Dated: February 26, 2018

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Signature: 

Nancy Doman

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PLANNED PARENTHOOD MID AND  
SOUTH MICHIGAN,  
jointly and severally,

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**Genesee County Clerk**

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2019 FEB 26 P 1:26

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[ngavrilovic@dykema.com](mailto:ngavrilovic@dykema.com)

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**PLAINTIFF AMY RYGWELSKI'S WITNESS AND EXHIBIT LIST**

Now Comes Plaintiff, AMY RYGWELSKI, by and through her attorneys, FIEGER, FIEGER, KENNEY & HARRINGTON, P.C. and pursuant to this Honorable Court's Scheduling Order identifies the following for her Witness and Exhibit list:



WITNESS LIST

1. Amy Rygwelski c/o Fieger Law
2. Frederick Presswood
3. Trudy Massey
4. Rebecca Jenkinson
5. Amy Fowlkes
6. Mike Nance
7. Any and all medical staff at **Northland Family Planning Center** who had contact with Ms. Rygwelski, including but not limited to:
  - a. Lindsay Dunmul
8. Any and all agents, employees, and representatives of **Planned Parenthood** who had contact with Ms. Rygwelski, including but not limited to:
  - a. Laura Castleman, M.D.
  - b. Marilou Rodriguez
  - c. Haroletta Lilly
  - d. Darci Morgan (D. Durbrow)
  - e. Sabrina Boston
  - f. Mary Petit (Kint)j
  - g. Diane Scully
9. Any and all pharmacies that Plaintiff used, including but not limited to:
  - a. Rite Aid
10. Any and all agents, employees, and representatives of **Quest Diagnostics**, including but not limited to:
  - a. Winston M. Htwe, M.D.
11. Any and all agents, employees, and representatives of Hurley Medical Center.
12. Any and all agents, employees, and representatives of Michigan Department of Licensing and Regulatory Affairs, including but not limited to:

- a. Danene Nunez
13. Any and all agents, employees, and representatives of **Genesys Health System** who had contact with Ms. Rygwelski.
14. Any and all agents, employees, and representatives of **Flint Fire Department**.
15. Any and all agents, employees, and representatives of **Regional Medical Imaging**, including but not limited to:
  - a. Walter D. Harper, D.O.
16. Christopher Tykocki, D.O.
17. **Mona Hardas, M.D.** and agents, employees and representatives of her office, including but not limited to:
  - a. Lorraine
18. Samasandra Kiran, M.D.
19. Terry Krznarich, M.D.
20. Keeper of the records of all doctors and medical facilities identified in this witness list.
21. Medical experts to be named.
22. Psychological experts to be named.
23. Laura Conklin, R.N. (Potential Nursing Expert)
24. Jennifer L. Johnson, MSN, APRN, AFN-BC, CFN, SANE-A, SANE-P (Nursing Expert)
25. Michael S. Cardwell, M.D. (Obstetrics and Gynecology Expert)
26. All experts named by Defendants, including but not limited to:
  - a. Gregory Chen, M.D.
  - b. Caron W. Jones, MSN, CNM, FNP
27. Dr. Robert Ancell, Ph.D. (Potential Psychology & Vocational Rehabilitation Expert)

23077 Greenfield Road, Suite 185  
Southfield, MI 48075

28. Michael Thompson, Ph.D. (Potential Economic Expert)  
Nitin Paranjpe, Ph.D.  
Thompson Econometrics  
2350 Franklin Road, Suite 200  
Bloomfield Hills, MI
29. Rottenberg, Mark, M.D. (Potential Physical Medicine and  
Rehabilitation Expert)  
28300 Orchard Lake Road, Suite  
Farmington Hills, MI 48334
30. Steven Newman, D.O. (Potential Neurology and Pain  
Rehabilitation Expert)  
25811 W. 12 Mile Road  
Southfield, MI 48034
31. Dr. Barry D. Pressman, M.D. (Potential Radiology Expert)  
8700 Beverly Blvd.  
Los Angeles, CA 90048
32. Dr. Won Chae (Potential Radiology Expert)  
29829 Telegraph Road  
Southfield, MI
33. Dr. Gerald Shiener (Potential Psychiatry Expert)  
251 Merrill  
Birmingham, MI 48009
34. Dr. Charles Seigerman, PhD (Potential Neuropsychology Expert)  
20006 Farmington  
Livonia, MI 48152
35. Bradley Sewick, Ph.D. (Potential Psychology Expert)  
26555 Evergreen Road, Suite 830  
Southfield, MI 48076
36. Dr. Nida Hamid (Potential Psychology Expert)  
1740 W. Big Beaver Road, Suite 206  
Troy, MI 48084
37. Plaintiff reserves the right to amend this witness list.
38. All witnesses made known through discovery or otherwise.

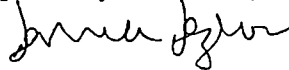
39. All witnesses named by Defendants.
40. Plaintiff's family members.
41. All witnesses named in medical records, hospital records, etc.
42. Rebuttal witnesses.

#### **EXHIBIT LIST**

1. Any and all investigation records, photographs, video and reports.
2. Any and all witness statements, both written and/or recorded.
3. Any and all 911 recordings and transcripts.
4. Any and all photographs, audio recording, and video footage of Plaintiff.
5. Any and all medical bills of Plaintiff.
6. Any and all medical records and lab results of Plaintiff.
7. Any and all articles written or media coverage with regard to the subject incident.
8. Any and all first responder, police, fire and EMS records, including all run sheets.
9. Any and all dispatch records and recordings.
10. Any and all photographs and/or video related to the subject incident produced through the course of discovery.
11. Any and all reports, notes, diagrams, schematics, drawings, photographs, audio tapes, statements and like identified through the course of discovery.
12. Any and all reports, documents and personnel records of Defendants.
13. Any and all treatises and records relied upon by experts in rendering their opinions relative to this lawsuit.
14. Any reports and curriculum vitae submitted by experts.

15. Any and all exhibits listed or introduced by Defendants or any party to this action.
16. Any and all diagrams of the location where the incident took place.
17. Any and all records of Plaintiff.
18. Any and all education records of Plaintiff.
19. Any and all employment records of Plaintiff.
20. State of Michigan criminal records.
21. Any and all deposition testimony.
22. Any rebuttal exhibits.
23. All exhibits identified by Defendants.
24. Exemplifications of the listed Exhibits.
25. Any and all cell phone records.
26. Jury Instructions.
27. Internal Revenue Service records.
28. Any and all pleadings which have been filed herein.
29. Any and all witness statements of parties and witnesses.
30. Any and all records, reports, or any other material related to or in conjunction with the incident giving rise to this litigation.
31. Video and/or audio recorded by witnesses.
32. All records from Defendants requested in discovery.
33. Plaintiff reserves the right to amend this exhibit list to add additional items that may be determined through the course of discovery.

Respectfully submitted,



GINA U. PUZZUOLI (P37992)  
DANIELLE L. DEZBOR (P79488)  
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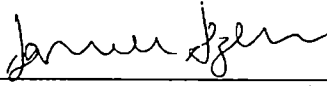
Dated: February 22, 2018

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument(s) was/were served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on February 22, 2018.

- Plaintiff's Witness List

By:  U.S. Mail  email  
 Hand Delivery  Federal  
Express

Signed:   
Danielle L. Dezbor