DOCKET NO.: UWY-CV-15-6027543 S : SUPERIOR COURT

VINCENT M. JACOVINO, : J. D. OF WATERBURY

ADMINISTRATOR OF THE ESTATE OF

VINCENT J. JACOVINO

V. : AT WATERBURY

ANNA SFAKIANAKI, M.D.; :

MEGAN MCCARTHY, M.D.;

YALE NEW HAVEN HOSPITAL, INC.;

YALE UNIVERSITY D/B/A YALE SCHOOL

OF MEDICINE; YALE UNIVERSITY D/B/A

YALE MEDICAL GROUP : JULY 19, 2017

PLAINTIFF'S DISCLOSURE OF EXPERT WITNESS

Pursuant to Practice Book Section 13-4, the plaintiff in the above-captioned matter hereby discloses the following expert:

A. <u>IDENTITY</u>

Corinne Leach, M.D., Ph.D. Women & Children's Hospital of Buffalo 219 Bryant Street Buffalo, NY 14222

B. SUBJECT MATTER AND SUBSTANCE OF TESTIMONY

Dr. Leach, who is board certified in Pediatrics and Neonatal-Perinatal Medicine, will testify about causation and damages. Dr. Leach will testify that Vincent J. Jacovino

suffered from severe hypoxic-ischemic encephalopathy (brain injury due to loss of oxygen and blood flow to organs) at the time of his delivery by emergency cesarean section. Severe perinatal hypoxia ischemia is the reason for his severely compromised condition at birth, his severe brain damage and his death. She will further testify that the hypoxic ischemic injury that caused Vincent J. Jacovino's severe brain damage and death was a result of his loss of blood caused by velamentous cord insertion and vasa previa of his mother, Rachael Jacovino. She will testify this was acute and occurred prior to delivery when Rachael Jacovino began hemorrhaging at her home just prior to presenting to St. Mary's Hospital. Dr. Leach will testify that if Vincent J. Jacovino had not suffered from acute fetal blood loss and the resulting hypoxic ischemic injury, he would have been born a healthy and normal child. Dr. Leach will testify regarding how HIE occurred in the presence of Rachael Jacovino's vasa previa and how it caused injuries that led to Vincent J. Jacovino's death.

Dr. Leach will also testify that Vincent J. Jacovino experienced pain and suffering secondary to his perinatal hypoxic ischemic injury and its treatment (blood sampling, suctioning, cooling), beginning with his resuscitation at birth, and persisting throughout his 3 days of life that included painful procedures including cooling.

C. BASIS FOR OPINIONS

Dr. Leach will testify based upon her review of the medical records, imaging studies and deposition transcripts as well as her education, training and experience as a board-certified pediatrician and neonatologist.

She reserves the right to amend and/or supplement her opinions should more information become available.

THE PLAINTIFF, VINCENT M. JACOVINO, ADMINISTRATOR OF THE ESTATE OF VINCENT J. JACOVINO

By 418917

Pamela L. Cameron Moore, O'Brien, Yelenak & Foti 891 Straits Turnpike Middlebury, CT 06762 Phone: (203) 272-5881

Juris No.: 408519 His Attorneys

CERTIFICATION

I certify that a copy of this document was mailed or delivered electronically or nonelectronically on July 19, 2017 to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Eric Stockman, Esq. Neubert Pepe & Monteith, P.C. 195 Church Street, 13th Floor New Haven, CT 06510

By 418917

Pamela L. Cameron, Esq. Commissioner of the Superior Court