

**SECOND JUDICIAL DISTRICT COURT  
COUNTRY OF BERNALILLO  
STATE OF NEW MEXICO**

**FILED  
2nd JUDICIAL DISTRICT COURT  
Bernalillo County  
2/28/2020 4:22 PM  
James A. Noel  
CLERK OF THE COURT  
Patsy Baca**

**TINA ATKINS, individually and as Personal  
Representative of the ESTATE of KEISHA MARIE  
ATKINS, and NICOLE ATKINS**

**Plaintiffs,**

**v.**

**No. D-202-CV-2018-05696**

**CURTIS BOYD, M.D. P.C. d/b/a  
SOUTHWESTERN WOMEN'S OPTIONS,  
CURTIS W. BOYD, Individually, CARMEN LANDAU,  
Individually, SHANNON CARR, Individually, THE  
UNIVERSITY OF NEW MEXICO BOARD OF REGENTS,  
THE UNIVERSITY OF NEW MEXICO HEALTH SCIENCES  
CENTER, LISA HOFER, M.D., Individually, UNM MEDICAL  
GROUP, INC., LILY BAYAT, M.D., Individually, and BRENDA  
PEREDA, M.D., Individually, LAUREN DVORSCAK, M.D., Individually.**

**Defendants.**

**PLAINTIFF'S FACT WITNESS LIST**

Plaintiff, Tina Atkins, by and through her attorneys of record, Michael J. Seibel and Justin K. Hall, pursuant to Rule of the New Mexico Rules of Civil Procedure and this Court's Pretrial Scheduling Order, discloses the following fact witnesses in this matter:

1. **Tina Atkins**-Tina Atkins will testify to the facts of the case, damages, Keisha's emotional pain and suffering.

c/oMICHAEL J. SEIBEL  
8500 Menaul N.E., Suite A-410  
Albuquerque, NM 87191-4066  
Tel. (505) 275-1700  
&  
JUSTIN K. HALL  
328 West IH-30, Ste 2  
Garland, Texas 75043  
Tel. (972) 226-1999

2. **Nicole Atkins-** Nicole Atkins will testify to the facts of the case, damages, Keisha's emotional pain and suffering.

c/o MICHAEL J. SEIBEL  
8500 Menaul N.E., Suite A-410  
Albuquerque, NM 87191-4066  
Tel. (505) 275-1700  
&  
JUSTIN K. HALL  
328 West IH-30, Ste 2  
Garland, Texas 75043  
Tel. (972) 226-1999

3. **Curtis Boyd-** Curtis Boyd will testify to the medical treatment of Keisha Atkins, the policies and procedures of Southwestern Women's Options, training of physicians of Southwestern Women's Options and the relationships with UNM.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

4. **Glenna Halberson Boyd-** Dr. Glenna Halberson Boyd will testify to the counseling policies and procedures of Southwestern Women's Options and the training of employees of Southwestern Women's Options.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

5. **Robin Wallace-** Robin Wallace is the Medical Director for the Southwestern Surgery Center in Dallas, Texas. She will testify about the standards of care for and the policies and procedures for induction abortion in Defendant's clinics, including Southwestern Women's Options clinic, and the training of employees.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

6. **Shelly Sella**-It is expected that Shelly Sella will testify regarding the relationship with UNM, back up physician status, equipment at Southwestern Women's Options the practices and procedures at Southwestern Women's Options.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

7. **Shannon Carr**-It is expected that Shannon Carr will testify regarding the medical treatment of Keisha, Southwestern Women's Options the practices and procedures.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

8. **Italia Aranda**-Italia Aranda will testify about her medical interactions with Keisha and her training and qualifications as a counselor and the policies and procedures of Southwestern Women's Options.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

9. **Carmen Landau**- Carmen Landau will testify regarding her interactions with Keisha Atkins, Keisha's alleged medical treatment, her training, protocols for Southwestern Women's Options.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

10. **Joan Garbonzi**- Ms. Garbonzi will testify regarding the office procedures, employee meetings, and the policy and procedure for Southwestern Women's Options.

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

11. **Trenton Wray**-Trenton Wray will testify regarding the medical treatment of Keisha Atkins.

**c/oRiley, Shane & Keller PA**

Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

12. **Gary Hatch**-Gary Hatch will testify regarding the medical treatment of Keisha.

**c/oRiley, Shane & Keller PA**

Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

13. **Rameet Singh**-Rameet Singh will testify regarding Keisha's treatment, the relationships between Southwestern Women's Options and University of New Mexico and her back-up status as a physician at Southwestern Women's Options.

**c/oRiley, Shane & Keller PA**

Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

14. **Lisa Hofler**-Lisa Hofler will testify about the treatment at Southwestern Women's Options.

**c/oRiley, Shane & Keller PA**

Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

15. **Eve Espy**- Eve Espy will testify as communication with OMI and UNMH Doctors.

**c/oRiley, Shane & Keller PA**

Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

16. **Lily Bayat-** Lily Bayat will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

17. **Lorraine Thaxton-** Lorraine Thaxton will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

18. **Paul Roth-** Paul Roth will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

19. **Kurt Nolte-** Kurt Nolte will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

20. **Lauren Dvorscak-** Lauren Dvorscak will testify as communication with OMI and UNMH Doctors.

c/oMadison, Mroz, Steinman & Dekleva, P.A  
Rebecca Kenny

201 Third St. NW  
Albuquerque, NM 87102  
[rsk@madisonlaw.com](mailto:rsk@madisonlaw.com)

21. **Rebecca Asch-Kendrick-** Rebecca Asch-Kendrick will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

22. **Barry Hazen-**Barry Hazen will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

23. **Rhonda Moya-**Rhonda Moya will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

24. **Irene Agostini-**Irene Agostini will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

25. **Yvonne A. Villalobos**-Yvonne A. Villalobos will testify as communication with OMI and UNMH Doctors.

c/oRiley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE  
Albuquerque, NM 87109

26. **Treating doctors and Nurses at UNMH**-Treating physicians at University of New Mexico Hospital will testify regarding their treatment of Keisha Atkins at Southwestern Women's Options.

27. **Employees at OMI**-Employees at Office of the Medical Investigator will testify regarding their investigation into the death of Keisha Atkins.

28. **Employees of Albuquerque Ambulance**- EMT employees will testify regarding the medical condition and transport of Keisha Atkins.

**James Clum**

**Nicholas Bennison**

**Jessie Crawford**

c/oAlbuquerque Ambulance Service  
4500 Montbel PL NE  
Albuquerque, NM 87107

29. **French Mortuary Custodian of Records**-Custodian of records for French's Mortuary will testify to the records and bills of Keisha Atkins.

30. **Applebees Custodian of Records**-Custodian of Records for Applebees will testify regarding the income of Keisha Atkins.

31. **Gardunos Custodian of Records**- Custodian of Records for Gardunos will testify regarding the income of Keisha Atkins.

32. **Unidentified employees of Southwestern Women's Options**-They will testify regarding policies and procedures of Southwestern Women's Options known as

**D.H.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**J.B.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**M.C.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**T.P.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**R.H.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**K.S.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**A.M.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**M.O.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111



**A.B.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**J.N.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

**E.P.,**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

and **J.K.**

c/o Justin Goodman  
Carol Romano  
5600 Eubank Blvd NE Ste 220  
Albuquerque, NM 87111

33. **The answering service for Southwestern Women's Options**-They will testify to calls from Keisha Atkins.

34. **Custodian of Records for University of New Mexico Hospital**-They will testify regarding the medical bills of Keisha Atkins.

35. Any witnesses identified in answers to Defendants' discovery.

36. Any witnesses identified by Defendant Southwestern Women's Options in Whole Women's Health vs. Paxton, et al.

37. Any witnesses identified in Plaintiff's discovery.

38. Any witnesses identified by experts.

39. Any witnesses identified by Defendant.

40. Any witnesses necessary for authentication of records offered into evidence at trial.

41. Any rebuttal witnesses, yet to be determined, and necessary for impeachment or

for any other purposes.

Plaintiff reserves the right to amend this witness list consistent with future discovery that will occur in this case.

Respectfully Submitted,

**LAW OFFICE OF MICHAEL J. SEIBEL**

By: /s/ by Michael J. Seibel

MICHAEL J. SEIBEL

P.O. Box 14066

Albuquerque, NM 87191-4066

Tel. (505) 275-1700 &

**LAW OFFICE OF JUSTIN K. HALL, PC**

/s/ Justin K. Hall

JUSTIN K. HALL

328 West IH-30, Ste 2

Garland, Texas 75043

Tel. (972) 226-1999

Attorneys for Plaintiffs

**CERTIFICATE OF MAILING**

I hereby certify that a true and accurate copy of the foregoing pleading was mailed to the following:

Resnick & Louis PC

Justin Goodman

5600 Eubank Blvd NE Ste 220

Albuquerque, NM 87111

Carol Romano

8111 East Indian Bend Rd

Scottsdale, AZ 85250

jgoodman@rlattorneys.com

cromano@rlattorneys.com

Riley, Shane & Keller PA  
Mark Riley  
David Gonzales  
Taryn Kaselonis  
3880 Osuna Rd NE

mriley@rsk-law.com  
dgonzales@rsk-law.com  
tkaselonis@rsk-law.com

Madison, Mroz, Steinman & Dekleva, P.A  
Rebecca Kenny  
201 Third St. NW  
Albuquerque, NM 87102

rsk@madisonlaw.com

this 28th day of February 2020.

/s/ Michael J. Seibel  
Michael J. Seibel