

(1) Jesse Rideout, M.D.
Department of Emergency Medicine
Tufts Medical Center
800 Washington Street
Boston, MA 02111, Box 111

The expert disclosure and certification of Jesse Rideout, M.D. is attached hereto as Exhibit C and made a part hereof.

(2) Laura Baecher-Lind, M.D.
Tufts Medical Center
800 Washington Street
Boston, MA

The expert disclosure and certification of Laura Baecher-Lind, M.D. is attached hereto as Exhibit D and made part hereof.

(3) Gary Chinman, MD
Assistant Professor of Psychiatry
Harvard Medical School
Boston, MA 02111, Box 111

The expert disclosure and certification of Gary Chinman, M.D. is attached hereto as Exhibit E and made part hereof.

(4) Joshua M. Mularella, M.D.

Dr. Mularella is expected to testify concerning his care and treatment of the plaintiff including his evaluation and examination of the patient in the CHA ED on March 15, 2016. He is expected to testify in accordance with the medical records that have been produced in this matter and his memory of his interactions with the plaintiff, and consistent with the testimony given at his deposition in this case and provided in his Answers to Interrogatories. He is further expected to testify that all care and treatment he provided to the plaintiff complied with the standard of care and that no injury or harm alleged by the plaintiff was the result of negligence on his part.

The defendants reserve the right to call other experts to testify as to the substantially same matters as set forth in the disclosures.

**The Defendants, Joshua M. Mularella, DO,
Cambridge Health Commission d/b/a
Cambridge Health Alliance and Cambridge
Health Alliance Physicians Organization,**

By their attorneys,

/s/ Donna Marcin

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Dated: August 30, 2023

CERTIFICATE OF SERVICE

I, Donna M. Marcin, attorney of record for the defendants, Joshua Mularella, M.D., Cambridge Public Health Commission d/b/a Cambridge Health Alliance and Cambridge Health Alliance Physicians Organization, do hereby certify that the following document:

1. Defendants, Joshua Mularella, M.D., Cambridge Public Health Commission d/b/a Cambridge Health Alliance and Cambridge Health Alliance Physicians Organization's Supplement to the Joint Pre-Trial Memorandum

was this day forwarded via electronic mail to:

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*Counsel for Defendants, Alice Mark, MD
& Planned Parenthood League of MA*

/s/ Donna M. Marcin

Donna M. Marcin, Esq.
BBO# 561731

Dated: August 30, 2023

EXHIBIT E

Gary Chinman, MD
Assistant Professor of Psychiatry
Harvard Medical School
Boston, MA 02111, Box 111

Gary Chinman, M.D. is a physician licensed to practice in the Commonwealth of Massachusetts. Dr. Chinman is board certified in ABPN General Psychiatry. Dr. Chinman received a BA from Hobart College followed by an Masters in Education from the University of Massachusetts and subsequently received his medical degree from Dartmouth Medical School in 1988. Dr. Chinman completed a Transitional Internship, Framingham Union Hospital, (1989); his residency in General Psychiatry, Massachusetts Mental Health Center, Harvard Medical School, and a fellowship in Psychopharmacology, Harvard Community Health Plan, Cambridge, MA, (1992) and a fellowship in Psychotherapy and Student Health, Harvard University Health Services, Cambridge, MA(1993). He maintains a private practice in general adult outpatient psychiatry, and serves as an Assistant Professor of Psychiatry, Harvard Medical School; former Advisor, Physician Health Services Clinical Advisory Committee and formerly a Senior Consultant with the Levinson Institute.

Dr. Chinman is expected to testify based upon his medical education, training, and experience in the specialty of Adult Psychiatry. He is also expected to testify based on his review of the patient's complete medical records, including but not limited to, the patient's medical records from MGH, CHA, Duffy Health Center, and Riverside Community Care, and his general familiarity with the medical literature as it applies to the field of Psychiatry, the written discovery exchanged among the parties to this litigation, and the depositions of the parties. Dr. Chinman is expected to testify that all of his opinions herein are held to a reasonable degree of medical certainty.

Dr. Chinman is expected to testify generally regarding psychiatric care and treatment and to testify generally regarding the mental health and psychiatric-medicine related conditions allegedly suffered by the patient. He is expected to testify concerning the allegations asserted by the plaintiff regarding her Post Traumatic Stress Disorder (PTSD). Specifically, Dr. Chinman will testify that the patient had a well-documented history of PTSD for many years prior to the events that are the subject of this litigation. Dr. Chinman is further expected to testify that there is no evidence to support the allegation that the events which form the basis of this litigation exacerbated or caused the patient's underlying medical and/or mental health conditions, including her prior diagnosed PTSD, to worsen. He is expected to testify concerning the damages alleged by the patient which concern psychiatric-related and/or mental health disorders. Dr. Chinman is expected to testify generally regarding the patient's documented history of substance abuse and pre-existing mental health condition, as well as, the signs and symptoms and presentation of PTSD and the criteria for diagnosing and treating PTSD. Dr. Chinman is further expected to testify generally regarding the plaintiff's mental health and psychiatric care from adolescence through the present day.

Dr. Chinman is expected to testify generally as to the DSM V and each specific diagnostic criteria (A-H) as they relate to the medical condition of this patient prior to and subsequent to the events which are the subject-matter of this litigation. He will further testify as to the patient's complete medical history as it relates to the DSM -V criterion for diagnosis and treatment of PTSD as outlined in the DSM-V Criterion, specifically:

Criterion A: Exposure to actual or threatened death, serious injury, or sexual violence (as delineated in the DSM –V (A1- A4):

Criterion B: Presence of intrusion symptoms associated with the traumatic event(s), beginning after the traumatic event(s) occurred, as elaborated in the DSM-V (B1-B5).

Criterion C: Persistent avoidance of stimuli associated with the traumatic event(s), beginning after the traumatic event(s) occurred, as evidenced by the criteria the DSM-V (C1-C2).

Criterion D: Negative alterations in cognitions and mood associated with the traumatic event(s), beginning or worsening after the traumatic event(s) occurred, as evidenced by the criteria set out in DSM-V D1-D7.

Criterion E. Marked alterations in arousal and reactivity associated with the traumatic event(s), beginning or worsening after the traumatic event(s) occurred, as evidenced by the criteria set out in DSM-V E1- E6:

Criterion F: Duration of the disturbance (Criteria B, C, D, E) is more than one month.

Criterion G: The disturbance causes clinically significant distress or impairment in social, occupational, or other important areas of functioning.

Criterion H. The disturbance is not attributable to the physiological effects of a substance (e.g., medication, alcohol) or another medical condition.

And the timing and presence of any dissociative symptoms which meet the criteria for PTSD, including evidence if depersonalization and/or derealization.

Specifically Dr. Chinman is expected to testify as to the pertinent aspects of the patient’s social and medical history as they relate to her previously diagnosed PTSD and other mental health issues. He is expected to testify regarding the patient’s long history of psychiatric treatment going back to adolescence, her reported history of bullying and inability to complete school, DSS reports and investigations as noted in the CHA medical records throughout her childhood and the psychiatric evaluations which noted her history of multiple school placements, frequent relocations, issues with discipline and refusal to attend school after being held back.

He is expected to testify regarding the pertinent medical records which document a prior history of sexual assault and rape at the age of 14 years old, the reported history of incidences of abuse between her parents and the history of her witnessing her parents’ physical violence. He will testify as to the patient’s history of trauma related to her father’s terminal illness, threats of violence and suicide. He will testify as to the trauma from the patient witnessing her mother’s suicidal ideation.

He is expected to testify regarding documented incidences of anger issues, violence, trouble falling asleep, nightmares of sexual assault, trouble with concentration and reported incidences of “self-cutting,” in addition to other signs of depression, anxiety, opiate abuse, bi-polar and/or manic behavior and PTSD versus borderline personality disorder, as noted in the patient’s medical

records. Dr. Chinman will discuss these records and the patient's history as they related to the patient's extensive prior history and diagnosis of PTSD as noted in her medical records as early as 2009 and repeatedly confirmed and referenced thereafter. He is expected to testify regarding her documented behavioral health issues including her pertinent history of Assault and Battery and incidences of violent physical confrontations. He will testify regarding her history of medications for depression and anxiety and symptoms of mania and inconsistent psychopharmacology and non-compliance with her medical and mental health treatments as it relates to her subsequent substance use disorder.

Dr. Chinman will testify as to the above, based upon review of the patient's medical history, mental health history and the patient's testimony at deposition. Dr. Chinman is expected to testify as to the evidence and diagnosis of PTSD which was present in the patient's history prior to the incidents that form the subject-matter of his litigation. He is expected to testify regarding his professional opinions, observations and understanding of the well-documented precipitants to PTSD that were present in this patient long before her abortion procedure.

Dr. Chinman is further expected to testify to the above in the context of the patient's substantive medical history and course of treatment that form the basis of this ligation, including the information contained in patient's medical records from the date of her positive pregnancy test in January of 2016 through the present and including but not limited to the medical care and treatment she received from Dr. Alice Mark and any and all Ob/Gyn providers from Planned Parenthood, Cambridge City Hospital, Cambridge Health Alliance ("CHA") ED, Women's Health Center at in Cambridge, Ob/Gyn Jessica Verosko MD, her primary care providers, Massachusetts General Hospital (MGH), Dr. Chisholm and Dr. Harney.

In sum, Dr. Chinman will testify as the patient's mental health prior to and subsequent to the events that are the subject matter of this litigation. He will further testify as to any alleged damages related to PTSD diagnosis, symptoms or exacerbation of symptoms of PTSD and specifically as to the patient's medical history as it relates to the DSM -V Criterion for diagnosis and treatment of PTSD. He will testify that the patient had a well-documented prior history of PTSD, that there is no evidence to support the allegation that the patient suffered worsening or exacerbated PTSD as a result of her abortion procedure or any of the events that followed. He is further expected that it would be difficult, if not impossible to differentiate the symptoms and mental health condition the patient presented with years prior to the events that are the subject matter of this litigation and the purported symptoms she experienced following her procedure.

These disclosures are intended only as a general summary of the expected testimony of the defense experts, which is not to be deemed self-limiting and which may be supplemented, as necessary, seasonably before trial. The Defendants reserve the right to supplement the above answers and to respond to the disclosures made by the Plaintiff.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT
DOCKET NO. 1984CV00119-11

AMANDA DAVIS,

Plaintiff,

v.

ALICE MARK, M.D., PLANNED PARENTHOOD
LEAGUE OF MASSACHUSETTS, INC., JOSUUA
M. MULARILLA, M.D., CAMBRIDGE PUBLIC
HEALTH COMMISSION D/B/A CAMBRIDGE
HEALTH ALLIANCE AND CAMBRIDGE
HEALTH ALLIANCE PHYSICIANS
ORGANIZATION,

Defendants.

CERTIFICATION OF EXPERT WITNESS

Pursuant to Massachusetts Superior Court Rule 30B, the Defendants do hereby submit this Certification of Expert Witness as follows:

I have been retained as an Expert Witness by the Defendants in the above-referenced matter. I have reviewed the expert disclosure and the disclosure accurately states the subject matter on which I am expected to testify, the substance of the facts and opinions to which I am expected to testify, and a summary of the grounds which I am expected to testify on trial.


Gary Chinman, M.D.

Date: 8/24/2023