

APPENDIX A

Opinion testimony. -- Will you, any person employed by you or the entity with which you practice, any treating health provider or any person other than an expert you have retained for the purposes of this litigation be offering opinion testimony at trial on:

- (a) The standard of care applicable to any defendant (including yourself) and the compliance (or noncompliance) therewith.

Yes _____ No _____

- (b) The causal relationship or lack of causal relationship between the conduct of any defendant and the injuries alleged by Plaintiff.

Yes _____ No _____

- (c) That Plaintiff's injuries were unavoidable or caused by reasons other than the medical negligence alleged in the Complaint.

Yes _____ No _____

- (d) That Plaintiff has not sustained the injuries, which he has claimed in this litigation.

Yes _____ No _____

- (e) On any subject which would be covered by expert testimony subject to the requirements of Pa.R.C.P. 4003.5

Yes _____ No _____

If you answered any subpart of the preceding Interrogatory “Yes”, provide the following:

- (a) The name of the witnesses;
- (b) The qualifications of the witness;
- (c) Every opinion which the witness will offer;
- (d) The facts to which the witness will testify;
- (e) The facts upon which the witness relied in reaching his opinions;
- (f) The names of the witnesses and the specific medical records upon which the witnesses relied in reaching his opinions; and
- (g) Any relationship the witness has to you, your medical practice, and/or the lawyer or **law firm** who represents you.

Have you or anyone acting on your behalf had any contact of any kind with any physician or health provider who treated Plaintiff after [last date of treatment by Defendant]?

YES _____

NO _____

If the answer is “Yes” please identify the physicians with whom you have had contact, the nature of the contact, the date of the contact, the persons who were involved in or have knowledge of the contact and, summarize all information obtained through the contact.