

1 Q. And you think that was Dr. Andrew -- 11:37:56
 2 A. Yes, it was. 11:37:58
 3 Q. -- that you spoke to? 11:37:58
 4 A. Uh-huh. 11:38:00
 5 Q. And procedurally, generally speaking, then the 11:38:00
 6 hospitalist would call the orders, the admission orders, 11:38:04
 7 over to the hospital? You wouldn't do that; is that 11:38:07
 8 correct? 11:38:09
 9 A. I don't know if they would call or physically 11:38:10
 10 write them. 11:38:12
 11 Q. But the admission orders would be done by the 11:38:13
 12 hospitalist? 11:38:14
 13 A. Yes. 11:38:16
 14 Q. Okay. Was it your understanding when the parents 11:38:16
 15 left your office that morning, whatever time it was, that 11:38:20
 16 you thought that they were going to go straight down to 11:38:24
 17 the hospital? 11:38:36
 18 A. Yes. 11:38:36
 19 Q. You didn't expect any delay of hours before they 11:38:36
 20 would go to the hospital? 11:38:36
 21 A. No. 11:38:36
 22 Q. Did you ever, by inquiry of any -- strike that. 11:38:36
 23 At some point, there was an inquiry apparently made by 11:38:36
 24 Dr. Pinnelas as to where these people were. 11:38:39
 25 A. Yes. 11:38:44

1 Q. And did you ever do any investigation or determine 11:38:44
 2 where they were or find out why they hadn't gotten to the 11:38:46
 3 hospital by the time he called? 11:38:49
 4 A. I don't remember if I called the house or not. 11:38:51
 5 Q. You don't have any current recollection of that? 11:38:55
 6 A. No. 11:38:56
 7 Q. Okay. With regard to -- you have looked at two 11:38:56
 8 Tele-Kids triage -- typed triage reports which were 11:39:08
 9 apparently sent to your office, correct? 11:39:14
 10 A. Yes. 11:39:16
 11 Q. Is that standard procedure, that -- if they take a 11:39:16
 12 call at some point in time, that a few days later, you 11:39:19
 13 would get a copy of their triage sheet typed like this? 11:39:22
 14 A. Yes. 11:39:25
 15 Q. At this point in time, do you have any criticisms 11:39:27
 16 of anything the nurses at Tele-Kids did with regard to 11:39:29
 17 your patient? 11:39:32
 18 A. No, I don't. 11:39:33
 19 Q. That's all I have. Thank you, Doctor. 11:39:36
 20 MR. HERSKOWITZ: Just a couple follow up. 11:39:39
 21 REDIRECT EXAMINATION 11:39:39
 22 BY MR. HERSKOWITZ: 11:39:41
 23 Q. When you said you wanted them to perform a nursing 11:39:42
 24 assessment, what did you mean? 11:39:44
 25 A. What usually forms -- what usually falls under the 11:39:46

1 nursing guidelines in Urgent Care. 11:39:50
 2 Q. Okay. And where are -- are there -- do you know 11:39:53
 3 what nursing guidelines are used at Arnold Palmer 11:39:57
 4 Children's Hospital Urgent Care? 11:40:00
 5 A. No, I don't. 11:40:02
 6 Q. In Barton Schmidt, are there nursing guidelines 11:40:09
 7 for Urgent Care? 11:40:13
 8 A. No. 11:40:14
 9 Q. Do you have any idea what guidelines would be used 11:40:16
 10 for Urgent Care? 11:40:18
 11 A. No. 11:40:20
 12 Q. And guidelines for what? If I were to ask 11:40:24
 13 Mr. Townsend to provide me guidelines, what guidelines are 11:40:29
 14 you referring to? 11:40:34
 15 A. The nurses typically take vitals, record vomiting 11:40:36
 16 and diarrhea. There may be other things that they do, but 11:40:40
 17 that's usually what goes on. 11:40:43
 18 Q. Okay. And you said that -- just in follow-up on 11:40:50
 19 Mr. Townsend's questions, with respect to the time that 11:40:54
 20 they were go to the hospital, did you tell the 11:41:00
 21 family, Go to the hospital right now, or, I'm going to 11:41:02
 22 call in, you need to go to the hospital to be admitted? 11:41:05
 23 Was there a time period you told them? 11:41:08
 24 A. Well, the aunt still that day wanted to go home 11:41:10
 25 with antibiotics for an apparent urinary tract infection. 11:41:13

1 I said, No, not this time. She is going to the hospital. 11:41:18
 2 I said that exactly. So I was trying to imply that this 11:41:21
 3 is imperative. 11:41:24
 4 Q. A latter time on Friday, when you told them to go 11:41:25
 5 to the hospital, they went? 11:41:30
 6 A. Yes. I told them exactly what I wanted, but -- 11:41:32
 7 Q. Well, we talked about that. This time, did you 11:41:38
 8 tell them, You need to go to the hospital right from here? 11:41:40
 9 Did you tell them, I'm going to call in, you need to be 11:41:43
 10 admitted to the hospital? 11:41:46
 11 A. I mean, I told them I wanted them -- I said, No, 11:41:47
 12 not this time. She has to be admitted. I don't know that 11:41:50
 13 I actually then said, You have to go immediately. But 11:41:53
 14 I -- in my tone, I believe it was conveyed. 11:41:56
 15 Q. Okay. I have no more questions. 11:42:02
 16 MS. SEWELL: I don't have any questions. 11:42:05
 17 MR. HERSKOWITZ: Don't do it. You can't resist, 11:42:09
 18 can you? 11:42:16
 19 RE-CROSS-EXAMINATION 11:42:16
 20 BY MR. TOWNSEND: 11:42:18
 21 Q. If you thought that this child had an acute 11:42:18
 22 abdomen when you were seeing her in your office on Monday 11:42:21
 23 and needed to be seen emergently, you would have called an 11:42:26
 24 ambulance and had an ambulance take her to the hospital, 11:42:30
 25 wouldn't you, Doctor? You wouldn't rely on the parents 11:42:32

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1 meeting some doctor down at Urgent Care? 11:42:35
 2 MR. HERSKOWITZ: Form objection. 11:42:38
 3 THE WITNESS: Right. I still didn't think it was 11:42:39
 4 an acute abdomen. She was in distress and dehydrated and 11:42:41
 5 uncomfortable. 11:42:45
 6 Q. (By Mr. Townsend) But it wasn't an emergency at 11:42:47
 7 that point in time? 11:42:48
 8 A. No. I didn't think it was going to need an 11:42:49
 9 ambulance. 11:42:51
 10 MR. TOWNSEND: Okay. Done. 11:42:52
 11 (Deposition concluded at 11:42 a.m.)
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1 STATE OF FLORIDA)
 2 COUNTY OF ORANGE)
 3
 4
 5 I, the undersigned authority, certify that the
 6 witness personally appeared before me and was duly sworn.
 7
 8 WITNESS my hand and official seal this 8th day of
 9 August, 2003.
 10
 11
 12
 13
 14
 15
 16 Laura A. Green,
 Notary Public, State of Florida
 My Commission cc 932733
 My Commission expires 5/1/04
 17
 18
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 22
 23
 24
 25

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1 CERTIFICATE
 2 STATE OF FLORIDA)
 3 COUNTY OF ORANGE)
 4
 5 I, Laura Green, Registered Professional Reporter
 and Notary Public in and for the State of Florida at
 6 Large, do hereby certify that the aforementioned witness
 was by me first duly sworn to testify the whole truth;
 7 that I was authorized to and did report said deposition in
 stenotype; and that the foregoing pages, numbered 1 to 156
 8 inclusive, are a true and correct transcription of my
 shorthand notes of said deposition.
 9
 10 I further certify that said deposition was taken
 at the time and place hereinabove set forth and that the
 taking of said deposition was commenced and completed as
 hereinabove set out.
 11 I further certify that I am not an attorney or
 counsel of any of the parties, nor am I a relative or
 12 employee of any attorney or counsel or party connected
 with the action, nor am I financially interested in the
 13 action.
 14 The foregoing certification of this transcript
 does not apply to any reproduction of the same by any
 15 means unless under the direct control and/or direction of
 the certifying reporter.
 16
 17 IN WITNESS WHEREOF, I have hereunto set my hand
 this 8th day of August, 2003.
 18
 19
 20
 21 Laura A. Green
 Notary Public - State of Florida
 My Commission cc 932733
 My Commission expires 5/1/04
 22
 23
 24
 25

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1 ERRATA SHEET
 2 IN RE: RAMOS V. ORHS
 3
 4 DEPOSITION OF: SHARI GEISMAR TAKEN: 7/31/03
 5
 6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 7 PAGE # LINE # CHANGE REASON
 8
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 21 Please forward the original signed errata sheet to this
 office so that copies may be distributed to all parties.
 22
 23 Under penalty of perjury, I declare that I have read my
 deposition and that it is true and correct subject to any
 changes in form or substance entered here.
 24
 25 DATE: SIGNATURE OF DEPONENT:

1 DATE: 8/8/03
2 TO: Shari Geismar, D.O., c/o Michelle Perez-Sotolongo
3 108 E. Central Blvd.
4 Orlando, Florida 32801

5 IN RE: Ramos v. ORHS, et al
6 03-CA-1726 32
7 Please take notice that on Thursday the 31st of
8 July, 2003, you gave your deposition in the
9 above-referenced matter. At that time, you did not waive
10 signature. It is now necessary that you sign your
11 deposition.

12 As previously agreed to, the transcript will be
13 furnished to you through your counsel. Please read the
14 following instruction:

15 At Page 157, you will find an errata sheet. As
16 you read your deposition, any changes or corrections that
17 you wish to make should be noted on the errata sheet,
18 citing page and line number of said change. DO NOT write
19 on the transcript itself. Once you have read the
20 transcript and noted any changes, be sure to sign and date
21 the errata sheet and return these pages in the
22 self-addressed envelope that has been provided for your
23 convenience. You need not return the entire transcript.

24 If you do not read and sign the deposition within
25 a reasonable time, the original, which has already been
forwarded to the ordering attorney, may be filed with the
Clerk of the Court. If you wish to waive your signature,
sign your name in the blank at the bottom of this letter
and return it to us.

Very truly yours,
Laura A. Green, RPR
Esquire Deposition Services
200 East Robinson Street, Suite 425
Orlando, Florida 32801
(407)426-7676

I do hereby waive my signature.

Shari Geismar, D.O.

cc via transcript: Jon Herskowitz, Esquire;
Michelle Perez-Sotolongo, Esquire; Susan Sewell, Esquire;