

DOCKET #: WWM-CV-21-5012142-S : SUPERIOR COURT
JANE DOE : J.D. OF WINDHAM
v : AT PUTNAM
HYDE SCHOOL AT SOUTH WOODSTOCK, : August 22, 2023
INC., ET AL

PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES

The Plaintiff, **JANE DOE**, hereby gives notice of the disclosure of expert witnesses who may testify at trial.

Names, Addresses and Employers

**Northeast Health Services
Erin Sutherland, MS
39a Industrial Park Road
Plymouth, MA 02360**

In addition, the Plaintiff reserves the right to and may elicit opinions upon cross-examination of any expert witnesses called by the Defendant at trial.

Subject Matter

The general subject matter upon which the medical experts will testify includes the medical condition of the Plaintiff; examinations, findings and diagnosis; the nature and extent of the plaintiff's injuries; the causation of those injuries; treatment; recommendations; the Plaintiff's prognosis; future treatment and the cost of same; and any permanency.

Substance of the Facts and Opinions

Erin Sutherland, MS of Northeast Health Services

Counselor Sutherland will testify regarding the examination and treatment of Plaintiff. It is expected that Counselor Sutherland will testify in accordance with the treatment notes and evaluation and consultation reports that have been provided through discovery. Evidence or testimony will include the nature and extent of the plaintiff's injuries, causation, prognosis, and permanency. Counselor Sutherland will testify that the Post-Traumatic Stress Disorder the Plaintiff suffered were directly related to the assault occurring in the Summer of 2005, and are permanent. Counselor Sutherland is expected to testify that the treatment of the plaintiff for injuries sustained in the assault occurring in the Summer of 2005 as more fully described in the medical reports and records, was both reasonable and necessary. Counselor Sutherland is expected to testify regarding the future treatment and cost of treatment the plaintiff may have to undergo as a result of the assault occurring in the Summer of 2005.

Summary of the Grounds for Each Opinion

The medical witnesses' opinions will be based upon examination and treatment of the plaintiff; interviews with the plaintiff; and review of medical records and reports and diagnostic test results; and upon their knowledge, education, experience and training.

THE PLAINTIFF,

By /s/ 403852
Edward Walsh, Esq.
MOORE, O'BRIEN & FOTI

CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on August 22, 2023, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

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Commissioner of the Superior Court