		Electronically Filed 9/13/2023 5:22 PM Steven D. Grierson CLERK OF THE COURT		
1	COMP KIMBALL JONES, ESQ.			
2	Nevada Bar No.: 12982		4.0	
3	MARK ROUSE, ESQ. Nevada Bar No.: 12273	CASE NO: A-23-87773 Departmen	_	
4	BIGHORN LAW 3675 W. Cheyenne Ave., Suite 100			
5	North Las Vegas, NV 89032			
6	Phone: (702) 333-1111 Email: <u>Kimball@BighornLaw.com</u>			
7	Mark.Rouse@BighornLaw.com Attorneys for Plaintiffs			
8	Allorneys for Flainlijfs			
9	DISTRICT COURT			
10	CLARK COUNTY, NEVADA			
11	MICHAEL DIXON, individually, and as special			
12	administrator for the ESTATE OF ALYONA DIXON, and as the parent and legal guardian of			
13	WESTEN DIVON a minure			
14	Plaintiffs,			
15	vs.	COMPLAINT		
16				
17	DIGNITY HEALTH d/b/a DIGNITY HEALTH EMERUS – BLUE DIAMOND, a foreign Non-	Arbitration Exemption Claimed:		
- /	Profit Corporation; HAYDEN MAAG, D.O.,	Medical Malpractice		
18	individually; DOE NURSES, I through X; DOE EMPLOYEES, I through X; DOES I through X;			
19	ROE COMPANIES, XI through XX, inclusive,			
20	Defendants.			
21	Plaintiffs, MICHAEL DIXON. individually.	and as special administrator for the ESTATE OF		
22	Plaintiffs, MICHAEL DIXON, individually, and as special administrator for the ESTATE OF			
23	ALYONA DIXON, and as the parent and legal guardian of WESLEY DIXON, a minor, by and			
24	through their counsel of record, KIMBALL JONES, ESQ., and MARK ROUSE, ESQ., with the Law			
25	Offices of BIGHORN LAW , and for their causes of action against the Defendants, and each of them,			
26	complains and alleges as follows:			
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	Page 1 o	of 14		

PARTIES AND JURISDICTION

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1. At all relevant times hereto, Plaintiff MICHAEL DIXON (hereinafter "MICHAEL") individually, and as special administrator for the ESTATE OF ALYONA DIXON (hereinafter "ALYONA"), and as parent and legal guardian of WESLEY DISON, a minor, is and was, a resident of Nye County, Nevada.

Upon information and belief, Defendant DIGNITY HEALTH d/b/a DIGNITY 2. 7 8 HEALTH EMERUS - BLUE DIAMOND (hereinafter referred to as "DIGNITY HEALTH") is, and 9 was at all times relevant hereto, a foreign non-profit corporation, authorized to conduct, and actually 10 was conducting business in Clark County, Nevada and was responsible, in some fashion, for the 11 marketing, directives and policies and procedures utilized and administered at Dignity Health - St. 12 Rose Dominican - Blue Diamond Campus, located at or near 4855 Blue Diamond Road, Las Vegas, 13 Nevada 89139. 14

3. Upon information and belief, at all times relevant hereto, Defendant HAYDEN MAAG,
D.O., (hereinafter referred to as "MAAG") was a resident of Clark County, Nevada.

4. Upon information and belief, Defendant DOE NURSES, I through X, is, and at all
times relevant hereto was a resident of Las Vegas, Nevada, and is a nurse employed by DIGNITY
HEALTH, and/or DEFENDANT ROE COMPANIES, XI through XX, and was acting within the
course and scope of their employment for DIGNITY HEALTH and/or ROE COMPANIES, XI
through XX. These DOES NURSES failed to adequately manage and assess ALYONA'S pain
resulting in her ultimate death.

5. Upon information and belief, Defendant DOE EMPLOYEES, I through X, is, and at all times relevant hereto were a resident of Nevada, and is employed by DIGNITY HEALTH and/or ROE COMPANIES, XI through XX, and were acting within the course and scope of their employment for DIGNITY HEALTH and/or ROE COMPANIES, XI through XX at the time of the 1 negligent management and care as alleged in the complaint and accompanying affidavit of Hany
2 Atallah, M.D.

6. Upon information and belief, Defendant DOE, I through X, is, and at all times relevant hereto was a resident of Nevada, and was an agent, employee, and/or servant of DIGNITY HEALTH and/or ROE COMPANIES, XI through XX, and was acting within the course and scope of their employment and/or agency for DIGNITY HEALTH and/or ROE COMPANIES, XI through XX at the time of the negligent management and care as alleged in the complaint and accompanying affidavit of Hany Atallah, M.D.

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14 8. Upon information and belief, at all times relevant hereto, Defendants MAAG, DOES, 15 DOE EMPLOYEES, and DOE NURSES were employed by Defendants DIGNITY HEALTH and/or 16 ROE CORPORATIONS XI, through XX, and/or were agents of Defendants DIGNITY HEALTH 17 and/or ROE CORPORATIONS XI through XX, selected by Defendants DIGNITY HEALTH and/or 18 ROE CORPORATIONS XI through XX, and were in the course and scope of their employment 19 and/or agency with Defendant DIGNITY HEALTH and/or ROE CORPORATIONS XI through XX. 20 21 Plaintiff reasonably believed Defendants MAAG, DOE and DOE NURSES were employees and/or 22 agents of Defendant DIGNITY HEALTH and/or ROE CORPORATIONS XI through XX, making 23 Defendant DIGNITY HEALTH and/or ROE CORPORATIONS, XI through XX, vicariously liable 24 for the actions of said Defendants due to their employment and/or ostensible agency with Defendant 25 DIGNITY HEALTH and/or ROE CORPORATIONS XI through XX. 26

9. Plaintiffs are unaware of the true names and legal capacities, whether individual,
corporate, associate, or otherwise, of the Defendants sued herein as DOES I through X, DOE

NURSES I through X; DOE EMPLOYEES I through X, and ROE COMPANIES XI through XX,
inclusive, and therefore sues said Defendants by their fictitious names. Plaintiffs pray leave to insert
said Defendants' true names and legal capacities when ascertained. Plaintiffs are informed and
believe and on that basis, allege that each of the Defendants designated herein as a DOE or a ROE is
in some way legally responsible for the events referred to herein and proximately caused the damages
alleged herein.

8 10. At all times mentioned herein, Defendants, including the DOE and ROE Defendants,
 9 were agents, servants, employees or joint ventures of every other Defendant herein, and were acting
 10 within the scope and course of said agency, employment, or joint venture, with knowledge and
 11 permission and consent of all other named Defendants.

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GENERAL ALLEGATIONS

11. Plaintiffs repeat and reallege the allegations above as though fully set forth herein.

15 12. On or about September 26, 2022, ALYONA initially intended on presenting to
16 DIGNITY HEALTH'S St. Rose Dominican Hospital's Siena Campus until she saw the large
17 "EMERGENCY" and "AMBULANCE" signs at DIGNITY HEALTH'S Blue Diamond Campus and
18 she specifically went DIGNITY HEALTH'S Blue Diamond Campus because she believed it to be a
19 hospital with a comprehensive emergency department.

21 13. Upon information and belief, on or about, September 26, 2022, ALYONA was 24 years
 22 old and presented to the emergency department at DIGNITY HEALTH'S Blue Diamond Campus
 23 located at or near, 4855 Blue Diamond Road, Las Vegas, NV 89139.

14. Upon information and belief, DIGNITY HEALTH'S Blue Diamond Campus has at
least one large "EMERGENCY" sign on the front of the building with an awning under the sign, and
another large "AMBULANCE" sign on the building with an awning under the sign suggesting to the
public that it is a hospital with a comprehensive emergency department.

15. At the same time and place, ALYONA presented to Defendant MAAG at DIGNITY 2 HEALTH'S - Blue Diamond Campus with a chief complaint of sharp lower abdominal pain since 3 vesterday and some vaginal bleeding.

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16. Upon information and belief, at the same time and place, ALYONA'S labs revealed an elevated white blood cell count of 16.53. Her hemoglobin and hematocrit were 13.4 and 40.1, respectively. Her urinalysis was significant for specific gravity of >=1.030 and ketones of 15.

8 17. Upon information and belief, at the same time and place, Defendant MAAG ordered a 9 CT and ultrasound.

10 18. Upon information and belief, at the same time and place, the interpreting radiologist 11 noted that the ultrasound revealed abnormal vascular flow between the endometrium and the 12 myometrium at the uterine fundus which could represent retained products of conception that should 13 14 be correlated with the patient's serial beta-hcg levels. Moreover, the interpreting radiologist noted 15 complex material within the endocervical canal which could reflect an abortion in progress or blood 16 products.

17 19. Upon information and belief, at the same time and place, the interpreting radiologist 18 noted that the CT show free intraperitoneal fluid within the abdomen and pelvis which is more than 19 the normal amount. 20

21 20. Upon information and belief, at the same time and place, Defendant MAAG negligently 22 failed to conduct a pelvic exam on ALYONA despite her abnormal lab results, her clinical history, 23 and her abnormal diagnostic imaging.

24 21. Upon information and belief, at the same time and place, Defendant MAAG negligently 25 failed to order a consult with an OB/GYN despite ALYONA'S abnormal lab results, her clinical 26 history, and her abnormal diagnostic imaging which was a substantial factor in ALYONA'S untimely 27 28 death.

1	22.	Upon information and belief, despite holding itself out as a "comprehensive emergency	
2	department" DIGNITY HEALTH'S Blue Diamond campus negligently did not have a credentialed		
3	OB/GYN, on-call at the facility, which was a substantial factor in ALYONA'S untimely death.		
4	23.	Upon information and belief, Defendant MAAG negligently discharged ALYONA	
5 6	without preforming a pelvic exam and without ordering an immediate consult with an OB/GYN		
7	which was a substantial factor in ALYONA'S untimely death.		
8		Upon information and belief, DIGNITY HEALTH, MAAG, and/ or, DOE NURSES, I	
9		DES I through X, and/or DOE EMPLOYEES, I through X, and/or ROE COMPANIES,	
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11			
12	a failed to adequately assess and treat ALYONA. These breach(es) in the standard of care were a		
13	3 substantial factor in ALYONA'S untimely death.		
14	25.	That the Declaration of Hany Atallah, MD, FACEP is attached hereto and incorporated	
15	herein by reference as though fully set forth herein.		
16	JURISDICTIONAL STATEMENT		
17	26.	Plaintiffs repeat and reallege the allegations above as though fully set forth herein.	
18 19	27.	The Eighth Judicial District Court of Nevada has jurisdiction of this civil tort action in	
20	accordance w	ith NRCP 8(a)(4), NRS 13.040 and NRS 41.130 as the occurrence giving rise to this	
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22	FIRST CLAIM FOR RELIEF		
23		(Professional Negligence)	
24	28.	Plaintiffs repeat and reallege the allegations above as though fully set forth herein.	
25	29.	Upon information and belief, during the course of treatment provided to ALYONA by	
26	DIGNITY HE	EALTH, MAAG, DOE NURSES, I through X, DOES I through X, DOE EMPLOYEES,	
27	I through X, and/or ROE COMPANIES, XI through XX, and each of them, had a duty to exercise		
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that degree of care, diligence and skill ordinarily exercised by medical facilities, nurses, medical
providers, doctors, specialists and staff in good standing in the community.

3 30. Upon information and belief, during the course of treatment provided to ALYONA, 4 Defendants DIGNITY HEALTH, and/or MAAG, and/ or DOE NURSES, I through X, DOES I 5 through X, and/or DOE EMPLOYEES, I through X, and/or ROE COMPANIES, XI through XX, and 6 each of them, failed to exercise that degree of care, diligence, and skill ordinarily exercised by nurses, 7 8 medical providers, medical facilities, doctors, and staff in good standing in the community by, among 9 other things, failing to follow the appropriate standard of care in assessing, evaluating, treating and 10 discharging ALYONA. See the Declaration of Hany Atallah, MD, FACEP. 11

Upon information and belief, during the course of treatment provided to ALYONA,
 Defendants DIGNITY HEALTH, and/or MAAG and/or DOE NURSES, I through X, DOES I
 through X, and/or DOE EMPLOYEES, I through X, and/or ROE COMPANIES, XI through XX, and
 each of them, breached the standard of care when they negligently failed to effectively and safely
 care for ALYONA *See* the Declaration of Hany Atallah, MD, FACEP.

32. Upon information and belief, Defendants DIGNITY HEALTH, and/or MAAG, and/or
DOE NURSES, I through X, DOES I through X, and/or DOE EMPLOYEES, I through X, and/or
ROE COMPANIES, XI through XX, and each of them, breached the standard of care by their failure
to exercise that degree of care, diligence, and skill ordinarily exercised by nurses, doctors, medical
providers, medical facilities and staff in good standing in the community constitutes negligence, gross
negligence, and/or recklessness.

33. Upon information and belief, Defendants DIGNITY HEALTH, and/or ROE
CORPORATIONS XI through XX, negligently supervised and/or trained MAAG, and/or DOE
NURSES, I through X, DOES I through X, and/or DOE EMPLOYEES, I through X, in evaluating,
assessing and/or discharging ALYONA.

34. At all times relevant hereto, Defendants DIGNITY HEALTH, and/or ROE CORPORATIONS XI through XX, negligently supervised and/or trained MAAG, and/or DOE NURSES, I through X, DOES I through X, and/or DOE EMPLOYEES, I through X, and each of them, knew or should have known that the incidents, conduct, acts, and failures to act as more fully described herein would and did result in physical, emotional, and economic harm and damages to ALYONA and/or her heir(s).

35. As a direct and proximate result of Defendants DIGNITY HEALTH, and/or ROE
CORPORATIONS XI through XX, negligently supervised and/or trained MAAG and/ or DOE
NURSES, I through X, DOES I through X, and/or DOE EMPLOYEES, I through X, and each of
their, negligence, ALYONA was caused to be hurt and injured in her health, strength, and well-being,
all of which caused ALYONA to suffer pain and suffering, and general damages in excess of Fifteen
Thousand Dollars (\$15,000.00).

15 36. That as a direct and proximate result of the negligence of the Defendants, and each of
16 them, ALYONA was required to, and did, employ physicians, surgeons, and other health care
17 providers, to examine, treat, and care for her and did incur medical and incidental expenses thereby.
18 The exact amount of such expenses is unknown at the present time; however, ALYONA alleges that
19 the damages are in excess of Fifteen Thousand Dollars (\$15,000.00).

37. Upon information and belief, that Defendants, and each of them are liable for punitive
 and/or exemplary damages for their fraud, malice and/or oppression. Specifically, Defendant MAAG
 knew or should have known that a female patient with a history of vaginal bleeding and/or abdominal
 pain required a pelvic exam and/or a stat consult with an OB/GYN to rule out more serious medical
 conditions.

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38. That Plaintiffs have been required to retain the Law Offices of **BIGHORN LAW** to prosecute this action, and are entitled to recover their attorney's fees, case costs and prejudgment interest.

<u>SECOND CLAIM FOR RELIEF</u> (Wrongful Death of ALYONA)

39. Plaintiffs repeat and reallege the allegations above as though fully set forth herein.

40. Plaintiff MICHAEL, as the spouse and next of kin of ALYONA is a lawful heir of the decedent, ALYONA, as that term is defined in NRS §41.085. This Plaintiff hereby asserts a claim for the wrongful death of his spouse, ALYONA, pursuant to NRS §41.085 subsections (1) through (4) both as an heir as well as special administrator of the Estate of ALYONA and on behalf of the estate.

41. Plaintiff MICHAEL, as the parent and legal guardian of WESLEY DIXON, a minor,
is the son and a lawful heir of the decedent, ALYONA, as that term is defined in NRS §41.085. This
Plaintiff, on behalf of his father and legal guardian, hereby asserts a claim for the wrongful death of
his mother, ALYONA, pursuant to NRS §41.085 subsections (1) through (4) both as an heir.

42. As a direct and proximate result of ALYONA'S death from injuries caused by Defendants' act or omission regarding ALYONA'S care, treatment, and/or discharge Plaintiffs MICHAEL and WESLEY, respectfully as ALYONA'S husband, and son, have sustained and will sustain pecuniary damages for their grief and sorrow, as well as the loss of Decedent's probably support, companionship, society, comfort, and consortium, as well as damages for the pain, suffering, or disfigurement of the Decedent ALYONA, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00) each. Plaintiffs seek recovery of these damages pursuant to NRS §41.085, subsections (1) through (4).

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1	43. As a direct and proximate result of ALYONA'S death from injuries caused by		
2	Defendants' acts or omissions as described in this Complaint regarding her care, treatment and		
3	discharge, the ESTATE OF ALYONA DIXON has sustained special damages, including medical &		
4	funeral expenses which Decedent incurred prior to and subsequent to her death. Plaintiff, ESTATE		
5 6	OF ALYONA DIXON, seeks recovery of these damages pursuant to NRS §41.085, subsections 2 and		
7	(5)(a).		
8	44. As a further direct and proximate result of ALYONA'S death from injuries caused by		
9	Defendants' acts or omissions regarding her care, treatment, and discharge, the ESTATE OF		
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11	ALYONA DIXON, is entitled to recover punitive damages that she would have recovered if she had		
12	lived, for Defendants' oppression, fraud, and/or malice.		
13	45. That as a direct and proximate result of the negligence of the Defendants, and each of		
14	them, ALYONA sustained pain and suffering in an amount more than Fifteen Thousand Dollars		
15	(\$15,000.00) prior to her untimely death.		
16	46. That Plaintiffs have been required to retain the Law Offices of BIGHORN LAW to		
17	prosecute this action, and are entitled to receive their attorney's fees, case costs, and prejudgment		
18 19	interest.		
	THIRD CLAIM FOR RELIEF		
20	(Negligence)		
21 22	47. Plaintiffs repeat and reallege the allegations above as though fully set forth herein.		
22	48. Upon information and belief, Defendant DIGNITY HEALTH had a duty of reasonable		
24	care to staff their medical facilities with OB/GYN medical providers to provide care and treatment to		
25	patients with OB/GYN issues.		
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49. Upon information and belief, Defendant DIGNITY HEALTH negligently failed to
 staff their respective facilities with on-call credentialed OB/GYN medical providers who could
 provide care and treatment to patients with OB/GYN issues such as ALYONA.

5 50. Upon information and belief, Defendant DIGNITY HEALTH had a duty of reasonable 6 care to operate with the full functions and capacities of a comprehensive emergency department when 7 it advertised itself to the public, including ALYONA as a comprehensive emergency department.

8 51. Upon information and belief, Defendant DIGNITY HEALTH negligently breached its
 9 duty of care when among other things, it failed to stock its emergency department with contrast for
 10 CT imaging and/or failed to have a credentialed OB/GYN on call.

52. Upon information and belief, Defendant DIGNITY HEALTH had a duty of reasonable
 care to only provide credentials to their respective medical facilities to competent medical providers
 who were skilled in performing pelvic exams.

15 53. Upon information and belief, Defendants, DIGNITY HEALTH negligently
 16 credentialed Defendant MAAG, without inquiring into their skill, training and/or education regarding
 17 performing pelvic exams.

19 54. Upon information and belief, Defendant DIGNITY HEALTH had a duty of reasonable
 20 care to implement reasonable discharge policies and/or procedures, including but not limited to,
 21 performing pelvic exams on pregnant female patients with abdominal pain, vaginal bleeding and an
 22 unknown source of the bleeding.

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55. Upon information and belief, Defendant DIGNITY HEALTH failed to implement reasonable policies and/or procedures for discharge.

56. Upon information and belief, Defendant DIGNITY HEALTH and/or ROE
CORPORATIONS XI through XX, had a duty of reasonable care to hire, train, retain and/or supervise
competent medical providers.

- 57. Upon information and belief, Defendant DIGNITY HEALTH and/or ROE 2 CORPORATIONS XI through XX, negligently hired, trained, retained, and/or supervised Defendants 3 MAAG, DOE NURSES I through X, DOES I through X, and/or DOE EMPLOYEES I through X, to 4 ensure that they were competent to perform their job duties and/or responsibilities.
- 58. Upon information and belief, at all times relevant hereto, Defendants, and each of 6 them, knew or should have known that the aforementioned acts and/or omissions to act would and 7 8 did result in physical, emotional, and economic harm and damages to ALYONA.

9 59. As a direct and proximate result of Defendants, and each of their, negligence, without 10 apportionment, ALYONA was caused to be hurt and injured in her health, strength, and well-being, 11 all of which caused the ESTATE OF ALYONA DIXON to suffer damages in excess of Fifteen 12 Thousand Dollars (\$15,000.00). 13

That as a direct and proximate result of the negligence of the Defendants, and each of 14 60. 15 them, ALYONA was required to, and did, employ physicians, surgeons, and other health care 16 providers, to examine, treat, and care for her and did incur medical and incidental expenses thereby. 17 The exact amount of such expenses is unknown at the present time; however, the ESTATE OF 18 ALYONA DIXON alleges that the damages are in excess of Fifteen Thousand Dollars (\$15,000.00). 19 61. That as a direct and proximate result of the negligence of the Defendants, and each of 20 21 them, ALYONA suffered mental anguish, emotional distress, pain and suffering, loss of enjoyment 22 of life, incidental, consequential, and general and special damages in excess of Fifteen Thousand 23 Dollars (\$15,000.00) recovered by the Estate. 24

62. Upon information and belief, that the Defendant's undertook these actions with 25 oppression, fraud and/or malice including but not limited to, as follows: 26

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• DIGNITY HEALTH marketed and/or advertised itself as a comprehensive emergency department, despite the fact that it did not have OB/GYN medical providers on-call and did not stock contrast for CT imaging.

63. That Plaintiffs have been required to retain the Law Offices of **BIGHORN LAW** to prosecute this action, and are entitled to recover their attorney's fees, case costs and prejudgment interest.

PRAYERS FOR RELIEF

Wherefore Plaintiffs, and each of them, expressly reserving the right to amend this Complaint
prior to or at the time of trial of this action to insert those items of damage not yet fully ascertainable,
pray for judgment against all Defendants, and each of them, as follows:

- Medical, funeral, and burial expenses damages from Defendants in an amount in excess of fifteen thousand dollars (\$15,000.00);
- Special damages resulting from ALYONA'S medical and miscellaneous expenses as of this date, and the miscellaneous expenses incidental thereto in a presently unascertainable amount;
 - 3. Compensatory damages in an amount in excess of fifteen thousand dollars (\$15,000.00);
 - Punitive and exemplary damages, pursuant to but not limited to those described in NRS §42.005, NRS §42.007, and NRS §42.021, in an amount in excess of fifteen thousand dollars (\$15,000.00);

5. MICHAEL and WESLEY'S general damages, including but not limited to loss of love, pain, suffering, affection, companionship, guidance, instruction, loss of consortium, and society in an amount in excess of fifteen thousand dollars (\$15,000.00).

DATED this 14th day of September, 2023.

BIGHORN LAW

By: <u>/s/ Mark A Rouse</u> KIMBALL JONES, ESQ. Nevada Bar No.: 12982 MARK ROUSE, ESQ. Nevada Bar No.: 12273 3675 W. Cheyenne Ave., Suite 100 North Las Vegas, Nevada 89032 *Attorneys for Plaintiffs*



Hany Atallah, MD, FACEP Chief Medical Officer 1611 N.W. 12th Avenue • Miami, FL 33136

305-585-7726 (Office) Hany.Atallah@jhsmiami.org www.JacksonHealth.org

Declaration of Hany Atallah, MD, FACEP

My background:

I am licensed to practice in the state of Florida. I specialize in emergency medicine and I am currently the Chief Medical Officer of Jackson Memorial Hospital.

As to my education, I received my bachelors in science in biological sciences at Washington University in St. Louis, Missouri, in 1994. I continued to medical school at New York Medical College in Valhalia, NY, obtaining my Doctor of Medicine degree in 1999. I completed my post medical school training from 1999 to 2003, first as an intern at Internal Medicine Jacobi Medical Center, in Bronx, New York, and then as a resident of emergency medicine at Jacobi Medical Center & Montefiore Medical Center. Following my training, I became an attending physician at Emory University Hospital from 2003 to 2021. I was the Vice Chair, Clinical Operations of Grady Memorial Hospital (Emory University School of Medicine) in 2020-2021 and the Chief of Emergency Medicine at Grady Health System from 2013-2021.

A true and correct copy of my curriculum vitae is attached hereto as Exhibit A, and incorporated by reference.

I am aware that the standard of care requires medical health providers, including emergency physicians, and others who practice emergency medicine, to exercise that reasonable degree of skill, knowledge, and care ordinarily possessed and exercised by members of their community under similar or like circumstances. I am further aware that the failure to have both the requisite skill or knowledge is a violation of the standard of care.

Based upon my education, experience, training, and expertise in the field of emergency medicine, I possess knowledge of the current standards of care applicable to emergency medicine and the causal factors regarding Ms. Dixon. As such, I am competent to testify in this action as to the subject of this declaration. I could and would testify to the facts that are set forth herein should I be called upon to do so at the time of trial.

In submitting the opinions contained within this declaration, I relied upon my knowledge, education, training, and expertise in the field of emergency medicine, and my career providing emergency medicine treatment to individuals like Ms. Dixon.

Records Reviewed:

I have reviewed the following records relating to the Alonya K Dixon matter:

Planned Parenthood Records - 9/22/2022

Dignity Health - St. Rose Dominican Hospital - 9/26/2022

Desert View Hospital Records - 9/27/2022

Clark County Coroner/Medical Examiner Autopsy Report

Case Summary:

Ms. Dixon was a 24 year old female who presented to Planned Parenthood on 9/22/2022. She had previously delivered a baby in December 2021. She was pregnant when she visited Planned Parenthood and had made a decision to terminate her pregnancy. Her last period was noted to have been on 8/17/2022. She had a physical exam and an ultrasound evaluation which revealed a single pregnancy with an estimated gestational age of 8 weeks 5 days. After appropriate counseling she was determined to be an appropriate candidate for elective termination of pregnancy with mifepristone followed 24-48 hours later by misoprostol intravaginally. She was appropriately counseled about the risks of the medical abortion and was discharged home.

On 9/26/2022 Ms. Dixon presented to the Dignity Health - St. Rose Dominican Hospital Emergency Department at 12:09 PM. She was triaged by Jun Shin at 12:20 PM with an acuity of 3. Ms. Dixon was subsequently was seen by Dr. Hayden Maag. Her chief complaint was "sharp lower abdominal pain since yesterday". The history noted that she had vaginal bleeding which had decreased and abdominal pain that had started the day prior. Her initial vital signs were BP 125/72, pulse 93, respirations 18, oxygen saturation 98%, temperature 37.3. Her exam was notable for tenderness in the right lower quadrant with no rebound and no guarding. The remainder of the physical exam was unremarkable. No pelvic exam was done. The patient received morphine 4 mg IV and labs and a CT and ultrasound were ordered. Ms. Dixon's labs were significant for an elevated white blood cell count of 16.53. Her hemoglobin and hematocrit were 13.4 and 40.1, respectively. The urinalysis was significant for a specific gravity of >=1.030 and ketones of 15. The ultrasound was interpreted by Dr. Justin J Puopolo and revealed "abnormal vascular flow between the endometrium and the myometrium at the uterine fundus could represent retained products of conception and should be correlated with the patient's serial beta-hcg levels. Complex material within the endocervical canal could reflect an abortion in progress or blood products. The findings were discussed with emergency room physician on 9/26/22 at 4:01 PM". The CT was interpreted by Dr. David Xu and the impression showed free intraperitoneal fluid within the abdomen and pelvis which is more than a normal amount.

The medical decision making documented by Dr. Maag included that Ms. Dixon her exam on multiple repeat evaluations was soft and non-peritoneal. He commented on the CT of the abdomen showing a small amount of fluid in the pelvis. The recommendation by radiology to repeat the CT with IV and PO contrast was not done because the specific PO contrast was not available. He commented on the pelvic ultrasound which showed concern for possible retained products of conception. He documents a lengthy conversation with the patient and family about work-up findings and possibility of retained products of conception. Ms. Dixon assured Dr. Maag that she would make a follow up appointment with her gynecologist and would have a low threshold to return to the ED if the symptoms worsened or changed. Dr. Maag documents a low suspicion for septic process/systemic infection. Ms. Dixon had vital signs repeated at 4:00 PM and were documented as a heart rate of 78, BP 115/82, respirations of 19, oxygen saturation of 99%was provided with a prescription for Zofran and was discharged at 4:29PM.

The following day on 9/27/2022 at 11:12 PM Ms. Dixon went to Desert View Hospital and registered in the emergency department. Her chief complaint was lower abdominal pain with nausea, vomiting, diarrhea for one day. Pain was in the left and right lower quadrants of her abdomen. She also reporting vaginal bleeding. She was triaged with an acuity of 3. Her initial vital signs revealed a temp of 38.5, pulse of 98, respirations of 20, oxygen saturation of 97%. Her next set of vital signs at 12:45 AM on 9/28/2023 showed a heart rate of 140, respirations of 20 and blood pressure of 103/71. A full set of labs were ordered. The results were significant for a white blood cell count of 121.3, hemoglobin of 19.2 and hematocrit of 56.2, calcium was 7.5, creatinine was 1.68, potassium of 3.0, total CO2 of 16, anion gap of 21, lactic acid of 9.1, INR of 1.6. Multiple medications were given including Pepcid, Zofran, Toradol, Bentyl, and Potassium. She was seen by Dr. James Clark. He noted similar information that was obtained in triage. He noted that 4 days ago she developed vomiting and diarrhea and inability to keep any fluid down. Dr. Clark documented crampy abdominal pain in the lower abdomen. On exam he noted that Ms. Dixon was in moderate distress and was severely dehydrated with active vomiting. He noted sunken eyes, dry mucous membranes, clear lungs, tachycardia with no murmur. Abdomen was soft, mildly distended with a fluid wave, diminished bowel sounds, voluntary guarding in the suprapubic region, right and left lower quadrants with mild rebound. He documented her skin exam as showing skin mottling with poor turgor. Her EKG noted a heart rate of 136. Dr. Clark documented his clinical impression as abdominal pain, vomiting and diarrhea, severe dehydration, acute renal failure, leukocytosis, sepsis, lactic acidosis, hypokalemia, sinus tachycardia, metabolic acidosis, pulseless electrical activity, respiratory failure. Dr. Clark documents his medical decision making to include vomiting and diarrhea with severe dehydration and Ms. Dixon was given 2 liters of IVF. Her heart rate had improved to 123 and Ms. Dixon was feeling better and no longer vomiting after Zofran. He documents sepsis was considered given the lactic acidosis and blood cultures were drawn and the patient was given Zosyn and IV fluids. Ms. Dixon was also given potassium by mouth. At 2:10 AM Ms. Dixon's symptoms had improved and her heart rate had decreased to 121. Dr. Clark suspected a lymphoproliferative disorder given the significantly elevated white blood cell count. He made arrangements for Ms. Dixon to be transferred. Ms. Dixon had a CT scan that suggested severe dehydration versus sepsis with collapsed IVC and poor perfusion of kidneys and bowel. It was also noted that the CT showed ascites and fluid overload in the lower aspect of the lungs. Dr. Ballelos at Summerlin Hospital accepted Ms. Dixon as a transfer.

At 3:10 AM Ms. Dixon acutely worsened and became more short of breath and had chest tightness with a heart rate of 150. Her lung sounds were noted to have rales and chest x-ray showed pulmonary edema. Ms. Dixon was started on BiPAP and was given Lasix. Ms. Dixon continued to deteriorate and required intubation and sedation. She vomited during intubation and about 5 minutes after intubation she went into a rhythm of pulseless ventricular tachycardia then asystole then pulseless electrical activity with bradycardia. ACLS was administered and multiple interventions were performed but she was pronounced at 5:32 AM.

Opinion:

My opinions relative to the standard of care are as follows:

- Dr. Maag did not perform a proper evaluation to ensure that it was safe to discharge Ms. Dixon. The CT scan showed complex debris within the cervix that could've been clots or products of conception. The standard of care would be for an exam to be done to ensure that there was no medical issue that would've required intervention either by Dr. Maag or evaluation by an OB/GYN.
- 2. Dr. Maag failed to adequately rule out sepsis as a cause of Ms. Dixon's symptoms. Ms. Dixon's white blood cell count was 16.43 which should've prompted increased concern for infection with the most obvious source being related to her medical abortion. This should've prompted a pelvic exam to ensure that there were no additional findings that required antibiotics or further evaluation by an OB/GYN.
- 3. Dr. Maag minimized the significance of the ascites that was present on the CT scan. This should've prompted further evaluation and admission for observation at a minimum given this abnormal finding.

In summary, it is my opinion within a reasonable degree of medical certainty that the incomplete evaluation of Ms. Dixon resulted in failure to meet the standard of care and treatment of Ms. Dixon by Dignity Health – St. Rose Dominican Hospital and Dr. Maag. These were deviations from the accepted Emergency Medicine standard of care, given Ms. Dixon's presenting history and clinical / diagnostic study findings and that this delay contributed to her death. I reserve the right to amend this report as more materials become available for my review.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

EXECUTED on this 9th day of September, 2023.

Harvy Y. Atallah, MD, FACEP Clifef Medical Officer Jackson Memorial Hospital 1611 NW 12th Ave WW101 Miami, FL Office: (305) 585-7286 Cell: (678) 516-9541

EXHIBIT A

Curriculum Vitae

- 1. Name: Hany Y. Atallah, MD, FACEP Revised: August 2022
- 2. Office Address: 1611 NW 12th Ave, WW 101, Miami, FL 33136 Telephone: 305-585-7286 Cell: 678-516-9541 Fax: 305-585-1361
- 3. E-mail Address: hany.atallah@jhsmiami.org
- 4. **Citizenship**: US

5. Current Titles and Affiliations:

- a. Clinical appointments:
 - i. Attending Physician, Department of Emergency Medicine, Jackson Memorial Hospital, 2021 – Present
- b. Administrative Appointments:
 - i. Chief Medical Officer, Jackson Memorial Hospital, 2021 Present

6. Previous Academic and Professional Appointments

- a. Assistant Professor, Department of Emergency Medicine, Emory University School of Medicine, 2003 2015
- b. Assistant Professor, Department of Adult and Elder Care, Nell Hodgson Woodruff School of Nursing Emory University, 2006-2008
- c. Assistant Director of Research Simulation Center, Nell Hodgson Woodruff School of Nursing, 2006-2008
- Adjunct Faculty, Department of Family and Community Nursing, Nell Hodgson Woodruff School of Nursing, Emory University School of Medicine, 2010 – 2021
- e. Adjunct Faculty, Assistant Professor, Physician Assistant Program, Mercer University, 2010 – 2021
- f. Associate Professor, Department of Emergency Medicine, Emory University School of Medicine, 2015 – 2021
- g. Adjunct Associate Professor, Department of Emergency Medicine, Emory University School of Medicine, 2021 – present
- h. Affiliated Associate Professor, Department of Surgery, University of Miami Miller School of Medicine, 2021 present

7. Previous Administrative and/or Clinical Appointments

- a. Attending Physician, Emory University Hospital, 2003 2021
- b. Attending Physician, Emory University Hospital Midtown, 2003 2021
- c. Attending Physician, Grady Health System, 2003 2021
- d. Attending Physician, Emory Johns Creek, 2007 2021
- e. Medical Director, Advanced Practice Providers, Emergency Care Center, Grady Health System, 2011 2017
- f. Associate Medical Director, Emergency Care Center, Grady Health System, 2008 – 2013

- g. Chief and Medical Director, Emergency Care Center, Grady Health System, 2013 – 2021
- h. Vice Chair, Clinical Operations Grady Memorial Hospital, Department of Emergency Medicine, Emory University School of Medicine, 2020 – 2021

8. Licensures/Boards:

- a. New York Medical License (inactive) issued 2001
- b. Drug Enforcement Administration License issued 2002
- c. Georgia Medical License issued 2002
- d. National Provider Identifier issued 2006
- e. Florida Medical License issued in 2021

9. Specialty Boards

a. Diplomat of American Board of Emergency Medicine, 2004

10. Education:

- a. 1990-1994 Bachelor of Science in Biological Sciences, Washington University, St. Louis, MO
- b. 1995-1999 Doctor of Medicine, New York Medical College, Valhalla, NY

11. Postgraduate Training:

- a. 1999-2000 Intern, Internal Medicine Jacobi Medical Center, Bronx, NY. Supervisor: Charles Nordin, MD
- b. 2000-2003 Resident, Emergency Medicine Jacobi Medical Center & Montefiore, Medical Center, Bronx, NY. Supervisor: Adrienne Birnbaum, MD

12. Continuing Professional Development Activities

- a. Learning to be Better Teachers, Emory University School of Medicine, 2003.
- b. Junior Faculty Development Course, Emory University School of Medicine, 2007.
- c. American College of Emergency Physicians Teaching Fellowship, 2007-2008.
- d. American College of Emergency Physicians, Emergency Department Director's Academy, 2010
- e. American College of Physician Executives, Physician in Management Seminar, 2011
- f. Quality Academy, Emory University School of Medicine, 2012.
- g. Perfecting Emergency Department Operations, Institute for Healthcare Improvement, 2012
- h. Leadership Atlanta, 2014 2015
- i. Data Driven Leadership and Instilling Accountability, The Advisory Board, 2014
- j. Facilitating Effective Teamwork and Managing Disruptive Behavior, The Advisory Board, 2015
- k. America's Essential Hospitals Fellows Program, Innovative and Adaptive Leadership: Essential in Times of Change. 2015-2016
- 1. Woodruff Leadership Academy, Emory University, 2017-2018

13. Committee Memberships:

- a. National and International
 - i. Behavioral Health Advisory Group, University Health System Consortium, 2014 – 2016
 - ii. Quality & Performance Committee, American College of Emergency Physicians, 2014 2018
 - iii. Finance Committee, Society for Academic Emergency Medicine, 2021 – 2022
 - iv. Membership Committee, Society for Academic Emergency Medicine, 2021 – 2022
- b. Regional
 - Community Mortality Review Committee State of Georgia Department of Behavioral Health and Developmental Disabilities, 2012 – 2015
 - ii. Mayor's Committee to designate Atlanta as a Safe Community, 2013 2016
 - iii. Joint Study Committee on Violence Against Health Care Workers, State of Georgia, 2014 – 2015
 - iv. Education and Research Committee, Winter Directors/Leaders Conference Co-Chair, Georgia College Emergency Physicians, 2014 – 2017
 - v. Membership Committee, Georgia College Emergency Physicians, 2014 2018
- c. Institutional
 - i. Incentive Compensation Committee, Department of Emergency Medicine, Emory University School of Medicine, 2003 – 2010
 - ii. Trauma Committee, Grady Health System, 2004 2021
 - iii. Trauma Outcomes Review Committee, Grady Health System, 2004 2013
 - iv. Emergency Management Committee, Grady Health System, 2005 - 2021
 - v. Restraint Committee, MD Champion, Grady Health System, 2007 - 2012
 - vi. ED/ICU Committee, Grady Health System, 2008 2016
 - vii. Emergency Medicine Education Committee, Emory University School of Medicine, 2008 – 2021
 - viii. EPIC Optimization Committee, 2009 2021
 - ix. Medication Safety Committee, Grady Health System, 2010 2017
 - x. Resident Promotion Subcommittee, Emory University School of Medicine, Emergency Medicine, 2012, 2017
 - xi. Medical and Department Directors Operations Group (MADDOG), Emory University School of Medicine, Emergency Medicine, 2010 – 2015
 - xii. Trauma Resuscitation Committee, Grady Health System, 2010 2020
 - xiii. Stroke Committee, Grady Health System, 2010 2015

- xiv. Clinical Services Committee, Grady Health System, 2013 2016
- xv. Trauma Outcomes Performance Improvement Committee, Grady Health System, 2013 – 2021
- xvi. Quality Committee, Grady Health System, 2013 2021
- xvii. Best Practice Subcommittee, Chair, Grady Health System, 2013 2018
- xviii. Best Practice Subcommittee, Grady Health System, 2013 2020
 - xix. Space Planning Committee, Grady Health System, 2013 2018
 - xx. Executive Committee, Emory Emergency Medicine, 2013 2021
 - xxi. Practitioner Performance Review Oversight Committee, Grady Health System, 2013 – 2021
- xxii. Utilization Review Committee, Grady Health System, 2013 2021
- xxiii. TOP Quality Committee, Grady Health System, 2013 2017
- xxiv. Risk Management Committee, Grady Health System, 2013 2021
- xxv. Medical Executive Committee, Grady Health System, 2013 2021
- xxvi. Long Stay Committee, Grady Health System, 2013 2021
- xxvii. Credentials Committee, Grady Health System, 2013 2021
- xxviii. Emory at Grady Chiefs Committee, Emory University School of Medicine, 2013 2021
- xxix. Search Committee Director, Emory Physician Assistant Program, Emory University School of Medicine, 2014
- xxx. Enterprise Access & Throughput Committee, Grady Health System, 2014 – 2017
- xxxi. Executive Associate Dean Advisory Committee, Emory University School of Medicine, 2014 – 2017
- xxxii. Department of Emergency Medicine APT Committee, Emory University School of Medicine, 2016 – 2021
- xxxiii. Search Committee Residency Program Director, Emergency Medicine, 2016 – 2017
- xxxiv. Search Committee Radiology Chief of Service, Grady Memorial Hospital, 2017
- xxxv. Program Evaluation Committee, Emory University Emergency Medicine Residency Program, 2017 – 2021
- xxxvi. Capacity Management Steering Council, Grady Health System, 2017 2021
- xxxvii. Schedule Optimization Faculty Taskforce (SOFT), Executive Sponsor, Department of Emergency Medicine, 2017 – 2018
- xxxviii. Care Logistics Steering Committee, Grady Health System, 2018 2019
 - xxxix. Overflow Committee, Grady Health System, 2020 2021
 - xl. Anti-racism Task Force, Grady Health System, 2020 2021

14. Peer Review Activities

- a. Manuscripts
 - i. Health Affairs, Reviewed paper on trauma center closures, 2013
 - ii. Pediatrics, 2015 2021

- iii. Review Board of Internal and Emergency Medicine. IAEM. Journal reviewer 2015 – 2016
- iv. Review Board of Trauma and Acute Care. Trauma and Acute Care. Journal reviewer 2015 2016
- b. Reviewer for the Ochsner Journal. Ochsner Journal. Journal reviewer 2017 present

15. Honors and Awards:

- a. Internship Award for Outstanding Dedication and Commitment, Department of Internal Medicine Jacobi Medical Center, Bronx, NY, 2000
- b. Physician of the Year Award-Class of 2003, Department of Emergency Medicine Jacobi-Montefiore Emergency Medicine Residency Program, Bronx, NY, 2003
- c. Special Notation by the PGY III class of being an outstanding faculty member, Department of Emergency Medicine, Emory University School of Medicine Emergency Medicine Residency Program, Atlanta, GA, 2004
- d. Residents' Advocate Award, Department of Emergency Medicine Emory University School of Medicine Residency Program, Atlanta, GA, 2006
- e. Fellow, American College of Emergency Physicians, 2007
- f. Medical Students' Teaching Award, Department of Emergency Medicine, Emory University School of Medicine Residency Program, Atlanta, GA, 2007
- g. Residents' Advocate Award, Department of Emergency Medicine Emory University School of Medicine Residency Program, Atlanta, GA, 2007
- h. Catch Me! I'm A Star" Customer Service Recognition, Grady Memorial Hospital Atlanta, GA, 2008
- i. Residents Teaching Excellence Award, Department of Emergency Medicine, Emory University School of Medicine Residency Program, Atlanta, GA, 2009
- j. Residents' Advocate Award, Department of Emergency Medicine, Emory University School of Medicine Residency Program, Atlanta, GA, 2010
- k. Rotating Residents Teaching Award, Department of Emergency Medicine, Emory University School of Medicine, Atlanta, GA, 2011
- 1. Rotating Residents Teaching Award, Department of Emergency Medicine, Emory University School of Medicine, Atlanta, GA, 2012
- m. Resident Advocate Award, Department of Emergency Medicine, Emory University School of Medicine Residency Program, Atlanta, GA, 2013
- n. Rotating Residents Teaching Award, Department of Emergency Medicine, Emory University School of Medicine, Atlanta, GA, 2013
- o. Georgia Association of Physician Assistants (GAPA), Physician of the Year, 2013
- p. 2nd Place Award Daniel H. Wagner Prize for Excellence in Operations Research, Daniel H. Wagner Associates, Inc., Hampton, VA, 2013
- q. Finalist Franz Edelman Award for Excellence in Operations Research, Boston, MA, 2014
- r. Medical Director of the Year, Georgia College of Emergency Physicians, 2014
- s. Pillar of Excellence Award, Grady Health System, White Coat Gala, 2019
- t. Continental Who's Who, Pinnacle Lifetime Achiever in the Field of Medicine, Continental Who's Who, 2020

u. The Emory at Grady Above and Beyond Award, Emory University School of Medicine, 2021

16. Society Memberships:

- a. American College of Emergency Physicians, 2001-Present
- b. Society for Academic Emergency Medicine, 2001-Present
- c. American Academy Of Emergency Medicine, 2002-2003
- d. Georgia College of Emergency Physicians, 2003-Present
- e. Society for Simulation in Healthcare, 2006-2016
- f. Eastern Association for the Surgery of Trauma, 2007-Present
- g. American Association of Physician Leadership, 2011-Present

17. Organization of Conferences

- a. Regional
 - i. Administrative Positions:
 - Director for airway workshop, 6th and 7th Annual State of the Art: Clinical Excellence in Emergency Care Conference, Atlanta, GA. 2006 – 2007.
 - 2. Director of simulation lab, 8th Annual State of the Art: Clinical Excellence in Emergency Care Conference Atlanta, GA. 2008.
 - ii. Sessions as Chair:
 - 1. Co-Chair, Winter Directors/Leaders Conference, Atlanta, Georgia College Emergency Physicians, 2014-2017

18. Clinical Service Contributions:

- a. 2004-2021 Improved relationship with between Emergency Medicine and Trauma Service at Grady Health System which has led to a reduction in mortality and improved team work
- b. 2008-2011 Improved the door to antibiotics time for patients admitted for pneumonia (core measure) from 40% in 2008 to >90% in 2011
- c. 2009 Developed agreed upon criteria to facilitate admissions of patients with common diagnosis
- d. 2010-2011 Decreased LOS for mental health patients presenting to the ED from 14.5 hours in December 2010 to 6.5 hours in December 2011
- e. 2010-2012 Decreased the length of stay in the ED from 14 to 7 hours in the span of 2 years while implementing a new electronic medical record.
- f. 2011 Assisted with the successful opening of the Grady Memorial Hospital Walk In Center
- g. 2011 Developed facilitated direct admission process to Grady Memorial Hospital
- h. 2011 Developed updated guidelines for triage of patients to the different areas of the Grady Emergency Department
- i. 2011 Assisted with successful opening of the Grady Memorial Hospital Marcus Trauma Center
- j. 2012 Created a series of agreements with services to facilitate admission of patients with intracranial hemorrhage, spontaneous pneumothorax, and intracranial masses
- k. 2012 Assisted in the opening of the 20 bed Clinical Decision Unit at Grady Health System

- 1. 2013 Created a multi-disciplinary team to develop an Emergency Department Admission, Consultation, and Transfer Acceptance Policy that was approved by the Grady Medical Executive Committee
- m. 2014 Successful implemented Rapid Medical Evaluation Process in the Emergency Department at Grady Memorial Hospital resulting in the following improvements:
 - i. Left without being seen decreased by 50%
 - ii. Door to provider time decreased by 45 minutes
 - iii. Median length of stay for discharged patients decreased by 90 minutes
 - iv. Median length of stay for all patients decreased by 90 minutes
 - v. Reduction in length of stay for lowest acuity patients by 3 hours
 - vi. Improved customer service scores in the Grady Emergency Department from 1st percentile to 85th percentile
- n. 2015 2017 Emergency Department Renovation. Worked in all aspects of a \$78 million renovation of the emergency department.
- o. 2016 Front end Redesign. Developed a patient segmentation plan to help decrease clinical load on faculty for low acuity patients and improve low acuity throughput.
- p. 2017 Rapid Medical Evaluation, Implemented LEAN process to revise flow through the newly completed emergency department resulting in the following improvements:
 - i. Left without being seen reduced to <2%
 - ii. Door to provider time decreased to 12 minutes
 - iii. Met 100% of goals for the department
- q. 2018 Implemented Mobile Emergency Department, Carolinas MED1, to manage epidemic.
 - i. Managed staffing and operations of this 14 bed mobile ED
 - ii. Unit cared for 80-100 patients per day
 - iii. Unit was on sight for two and a half months
- r. 2018 Optimization of emergency department flow resulting in:
 - i. Left without being seen + eloped rate of <4%
 - ii. Maintained door to provider time of 10-15 minutes
 - iii. Overall length of stay of 5-6 hours despite a 20% increase in volume over 3 years and a continued increase in ED boarding.
- s. 2019 Quality focus in the emergency department:
 - i. Left without being seen of <1%
 - ii. Improvement in trauma care
 - iii. Door to provider time of <15 min
 - iv. Have met 100% of quality goals as set forth by Grady Health system for the last 3 years
 - v. Formation of an orderset committee to further standardize care and improve quality
- t. 2019 2021 Management of an internal disaster resulting in loss of 30% of inpatient beds.
 - i. Maintenance of clinical operations for strategic service lines
 - ii. Planning and implementation of two external mobile care units

- iii. Increased utilization of observation admissions given bed space limitations
- iv. Maintenance or improvement of key performance indicators during this disaster
- u. 2020 2021 Management of Coronavirus pandemic regional coordinating hospital of the Atlanta Metro Area
 - i. Development of treatment protocols
 - ii. Coordination with EMS, nursing homes, and homeless shelters regarding treatment and patient management
 - iii. Maintenance or improvement in key performance indicators
 - iv. Management of PPE needs and protocols for the emergency department
 - v. Development of a modified airway management protocol
 - vi. Management of limited rapid Covid-19 testing algorithm
- v. 2021 2022 Jackson Memorial Hospital Clinical Operations
 - i. Reduction in overall hospital length of stay by .8 days over the course of 9 months
 - ii. Developed educational material and feedback for management of denials due to copy and paste
 - iii. Jackson Memorial Hospital Transfer Center oversee transfer center with an average call volume of 1100 calls per month
 - iv. Improved communication with attendings, housestaff, advanced practice providers in an effort to drive hospital wide improvement in quality, throughput, safety

19. Community Outreach:

- a. General
 - i. Presentation at Tritt Elementary School on proper diet, 2007
 - ii. Presentation at Tritt Elementary School on heart and blood vessels, 2013
 - iii. Trauma Outreach Program at Dickerson Middle School, 2013
 - iv. Trinity Presbyterian Church Forum on Gun Violence Panel Speaker, 2013
 - v. Board of Directors of Girls on the Run, 2014 2018
 - vi. 21st Century Leaders, Global and Community Health Day, 2015
 - vii. Board of Director of Atlanta Fire Foundation, Inc. May 2015 present
 - 1. Developed a Tuition Reimbursement Program to encourage firefighters to pursue higher degree education
 - viii. Visiting Team Medical Liaison, National Football League, 2016 present
 - ix. President Obama's Young Southeast Asian Leaders Initiative (YSEALI) Program, 2016
 - x. Echoing Green Atlanta (Site Visit), 2016
 - xi. Gwinnett Math Science Academy, Careers in Medicine, 2017, 2019
 - xii. Emory Scholarship and Service Program, 2017
 - xiii. Lovett High School, Community Health, 2017, 2018
 - xiv. Boys and Girls Club, Careers in Medicine, 2018
 - xv. Atlanta Girls School, Careers in Medicine, 2018
 - xvi. LEAD Atlanta, Challenges in Medicine, 2019

- xvii. Boyd Elementary School, Career Week, 2020
- b. Media Appearances:
 - i. July 2010 Fox News "Heat Related Illness"
 - ii. July 2011 Atlanta Journal Constitution "Heat Related Illness"
 - iii. February 2012 AHC Media "Dental Care in the ED"
 - iv. July 2013 Atlanta Magazine "Uninsured Care and the Affordable Care Act"
 - v. August 2013 Atlanta Business Chronicle Grady upgrades to ED
 - vi. August 2013 CBS News "Wait 2 text campaign"
 - vii. August 2013 CBS News "Air Gun Injuries"
 - viii. November 2013 CBS News "Bus Seat Belt Safety"
 - ix. November 2013 Fox Sports "Achalasia"
 - x. December 2013 Georgia Power "Annual Report Video"
 - xi. April 2014 Atlanta Journal Constitution "Trauma Patients"
 - xii. August 2014 CBS Evening News (National) "Ebola"
 - xiii. August 2014 CBS News "Dangers of Overhydration"
 - xiv. September 2014 NBC News "Multiple Bee Stings"
 - xv. October 2014 Fox News "Hospital Preparedness Ebola"
 - xvi. October 2014 Al Jazeera America "Hospital Preparedness Ebola"
 - xvii. December 2014 Wall Street Journal "Flu"
 - xviii. February 2015 WSB TV "Throwback Thursday"
 - xix. February 2015 Health Leaders Magazine "Improving ED Throughput"xx. February 2016 Atlanta Magazine "Grady"
 - xx. February 2010 Atlanta Magazine Orady
 - xxi. July 2016 Atlanta Jewish Times "Epidemic of Opioid Addiction"
 - xxii. April 2017 WebMD "Ride Share Service Hospital Transportation"
 - xxiii. July 2017 Georgia Focus "Grady's role in emergency and trauma care"
 - xxiv. September 2017 ACEP Commemorative Book "The Story of Emergency Medicine"
 - xxv. December 2017 The Weather Channel "Weather Related Deaths"
 - xxvi. January 2018 CNN "Hypothermia"
 - xxvii. January 2018 NPR "Flu"
 - xxviii. January 2018 Health Leaders Media "Alcohol Related Visits"
 - xxix. February 2018 ED Management "ED-based Intervention Connects Frequent Users With Program to Address Underlying Needs"
 - xxx. February 2018 Wall Street Journal "Flu"
 - xxxi. February 2018 WSB TV- "Flu"
 - xxxii. February 2018 Fox 5 News "Flu"
 - xxxiii. February 2018 11 Alive TV "Flu"
 - xxxiv. February 2018 CBS 46 TV "Flu"
 - xxxv. February 2018 CBS This Morning (National) "Flu"
 - xxxvi. February 2018 NBC Today Show (National) "Flu"
 - xxxvii. February 2018 ABC News (National) "Flu"
 - xxxviii. February 2018 WABE FM/NPR "Flu"
 - xxxix. February 2018 WSB Radio "Flu"
 - xl. February 2018 Georgia Health News "Flu"
 - xli. February 2018 Associated Press "Flu"

- xlii. February 2018 CNN Espanol "Flu"
- xliii. February 2018 Fulton Government TV "Flu"
- xliv. April 2018 Atlanta Journal Constitution "Opioid Cases in the ED"
- xlv. April 2018 Atlanta Journal Constitution "Flu"
- xlvi. May 2018 Georgia Health News "Flu"
- xlvii. May 2018 Grady Velocity "Opening Speaker for this Cycling Fundraiser for Grady Hospital"
- xlviii. May 2018 The Gathering Spot "How to Plan for a Superbowl"
 - xlix. June 2018 Atlanta Journal Constitution "Salmonella"
 - 1. July 2018 City of Atlanta Video "Scooter Injuries"
 - li. August 2018 WebMD "Scooter Injuries"
 - lii. September 2018 Washington Post "Scooter Injuries"
 - liii. October 2018 Atlanta Business Chronicle "Scooter Injuries"
 - liv. December 2018 Atlanta Journal Constitution "Scooter Injuries"
 - Iv. January 2019 Atlanta Journal Constitution "Mobile Emergency Department"
 - lvi. January 2019 WSB Radio "Mobile Emergency Department"
 - lvii. January 2019 Fox 5 News "Mobile Emergency Department"
 - lviii. January 2019 11 Alive News "Mobile Emergency Department"
 - lix. January 2019 GA Health News "Mobile Emergency Department"
 - lx. January 2019 WSB-TV "Mobile Emergency Department"
 - lxi. January 2019 CBS 46 TV "Mobile Emergency Department"
 - 1xii. January 2019 Kaiser Health News "Scooter Injuries"
- lxiii. January 2019 Emory Magazine "Emory's Super Bowl Team"
- lxiv. February 2019 NBC Nightly News (National) "Scooter Injuries"
- lxv. February 2019 WSB TV- "Scooter Injuries"
- lxvi. February 2019 CBS 46 TV "Scooter Injuries"
- lxvii. March 2019 Atlanta Journal Constitution "Atlanta City Council e-Scooter Resolution"
- lxviii. June 2019 Kaiser National Journalists Round Table -- "Healthcare"
- lxix. July 2019 Atlanta Journal Constitution "Scooter-related Injuries in Atlanta Difficult to Track"
- lxx. August 2019 11 Alive News "Mass Shootings"
- lxxi. August 2019 Atlanta Journal Constitution "Clayton Student Who Died Loved Basketball, Was Set to Graduate in 2021"
- lxxii. September 2019 CBS 46 TV "Heat Safety Tips"
- 1xxiii. January 2020 Atlanta Journal Constitution "Flu"
- lxxiv. January 2020 Fox 5 News "Coronavirus"

20. Formal Teaching:

- a. Medical Student Teaching
 - i. Allergic Reactions Lecture lecture to second year medical students on allergic reactions and immunologic response, Emory University School of Medicine, 2003
 - ii. Taught ACLS to second year medical students, Emory University School of Medicine, 2004

- iii. Thrills and Spills Course Introduced second year medical students to ultrasound, Emory University School of Medicine, 2005
- iv. Palliative Care Course First year medical student instructor for discussing palliative care, Emory University School of Medicine, 2005
- v. Taught ACLS to second year medical students, Emory University School of Medicine, 2006
- vi. Emergency Medicine Objective Structured Clinical Examination (OSCE) instructor, Emory University School of Medicine, 2007
- vii. Thrills and Spills Airway Lab, Introduced medical students to airway techniques and modalities, Emory University School of Medicine, 2008
- viii. Served as a Discovery mentor for a fourth year medical student doing concentrated research for four months, Emory University School of Medicine, 2010
- ix. Research mentor for MD/MBA student doing research for four months, Emory University School of Medicine, 2016
- x. Research mentor for MD/MBA student doing research for six months, Emory University School of Medicine, 2018
- xi. Panelist for medical student COVID-19 elective, Emory University School of Medicine, 2020
- xii. Dinner with a Doc, Virtual dinner fundraiser for feeding families in need, Emory University School of Medicine, 2020
- b. Graduate Programs
 - i. Residency program
 - 1. Pulmonary Embolism Review of literature as well as current diagnostic and treatment modalities presented to the Emory University School of Medicine Department of **Emergency Medicine**, 2003
 - 2. Neonatal and Pediatric Resuscitation Review and update on current management presentation to Emory University School of Medicine Department of Emergency Medicine, 2004 - 2008
 - 3. Approach to the Trauma Patient in the Emergency Department Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2005
 - 4. Submersion and Diving Emergencies Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2005
 - 5. Airway Lab Taught fiberoptic intubation to the Emory University School of Medicine Department of Emergency Medicine 2006 - 2011
 - 6. Disorders of Sodium and Water Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2006
 - 7. Environmental Emergencies Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2006

- Hip, Femur, and Knee Exam and Injuries Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2006 – 2011
- Management of the Difficult Airway Lecture on approach to and management of the difficult airway. Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2007 – 2011
- Simulated oral board exam review to the Emory University School of Medicine Department of Emergency Medicine residents, 2008 – 2011
- Invasive Procedure Lab Instructor for Emory University School of Medicine Department of Emergency Medicine PGY 2 residents in cadaver lab on thoracotomy and cutdown, 2008 – 2011
- Pancreatitis Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2008 – 2011, 2019
- Beyond Dilaudid: Headache in the Emergency Department Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2009
- 14. Customer Service Lecture to the Emory University Department of Emergency Medicine, 2010 – Present
- Morbidity and Mortality Conference Presentation to the Emory University School of Medicine Department of Emergency Medicine, 2010
- 16. Exam and Injuries of the Pelvis and Hip, Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2012
- 17. Case Conference: Abdominal Trauma, Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2016
- Emergency Department Administration, Lecture to the Emory University School of Medicine Department of Emergency Medicine, 2016, 2018
- 19. Emergency Department Shift Leadership, Panelist of a group that discussed leadership during a shift, 2018
- 20. Leadership, Lecture to the Emory University School of Medicine Department of Emergency Medicine PGY III residents, 2019
- ii. Fellowship Programs
 - 1. Emergency Department administrative fellowship, Emory University School of Medicine Department of Emergency Medicine, 2011 - Present
 - 2. Trauma/Surgical Critical Care Fellowship Lecturer, Emory Department of Surgery, 2013 2018
- c. Other

- i. Nurse Practitioner and Nursing Teaching
 - Clinical Case Presentations Discussed cases with the Emergency Medicine Nurse Practitioner students using SimMan (patient simulator) Emory University School of Nursing, Emergency Nurse Practitioner Program, Atlanta, GA, 2004 – 2008
 - 2. Management of the Difficult Airway, Emory University School of Nursing, Emergency Nurse Practitioner Program, Atlanta, GA, 2011 – 2021
 - 3. Approach to the Trauma Patient and Thoracic Trauma, Emory University School of Nursing, Emergency Nurse Practitioner Program, Atlanta, GA, 2013 – 2021
 - 4. Pancreatitis, Grady Health System, Emergency Department, Nurse Resident Teaching, Atlanta, GA 2018
- ii. Physician Assistant
 - 1. Pregnancy Complications Mercer University Physician's Assistant Program, Atlanta, GA, 2009 2020
 - Abdominal Trauma, Emory Physician Assistant Program, 2013 – 2016
 - 3. Chest Trauma Lecture, Emory Physician Assistant Program, 2015 – 2016
- iii. Other
 - Disaster Training. Lectured to multiple different groups with multiple different organizations on Advanced and Basic Disaster Life Support, including use of simulation as an educational aid. DeKalb Hospital, Department of EMS and Warner Robins Military Base, 2007-2008
 - 2. Interdisciplinary Team Training. Co-developer of a multidisciplinary team training model for medical and nursing students utilizing simulation and TeamSTEPPS. Emory University School of Medicine and Emory University School of Nursing, Atlanta, GA, 2008-2009.
 - 2010 Status of Health; Perception vs. Reality Lunch & Learn Seminar, hosted by the DeKalb County Board of Health, Office of Infectious Diseases, Atlanta, GA, 2010
 - 4. Advanced Trauma Life Support course instructor, 2011 Present
 - Assistant Secretary for Preparedness and Response (ASPR) training grant to teach Advanced Disaster Life Support, Tifton, GA, 2013

21. Supervisory Teaching:

- a. Post-doctoral fellows directly supervised:
 - i. Dr. Sean Lowe, 2012-2014, Emergency Medicine Administration Fellow
 - ii. Dr. Brenda Oiyemhonlan, 2016 2017, Emergency Medicine Administration Fellow
 - iii. Dr. Yamal Taha, 2020 2021, Emergency Medicine Administration Fellow
- b. Residency Program:

- i. Patrick Kane, MD, 2008-2009, Mentor (Quality Improvement); community practice in St. Louis, MO
- ii. Nichole Choi, MD, 2008-2009, Mentor (Quality Improvement); community practice in California
- iii. Robin Lowman, 2008-2009, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- iv. Aydin Huq, MD, 2008-2009, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- v. John Limehouse, MD, 2008-2009, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- vi. Lyndsay Frankenberg, DO, 2008-2009, Mentor (Quality Improvement); community practice in Chattanooga, Tennessee
- vii. Deborah Shipley, MD, 2008-2009, Mentor (Quality Improvement); community practice in St. Louis, MO
- viii. C. Nee-Kofi Mould-Millman, MD, 2008-2009, Mentor (Research), University of Colorado
- ix. Jeremy Chou, MD, 2009-2010, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- x. Rachel O'Malley, MD, 2009-2010, Mentor (Quality Improvement); community practice in Florida
- xi. Ajay Bhatt, MD, 2009-2010, Mentor (Quality Improvement); community practice in Hawaii
- xii. Wendy Miller, MD, 2009-2010, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- xiii. Vinh Ngo, MD, 2009-2010, Mentor (Quality Improvement); community practice in Texas
- xiv. Mark Fenig, MD, 2009-2010, Mentor (Quality Improvement); community practice in New York
- xv. David Powell, MD, 2009-2010, Mentor (Quality Improvement); community practice in Atlanta, Georgia
- xvi. Laurie Raborn, MD, 2009-2010, Mentor (Quality Improvement); community practice in Utah
- xvii. Seema Sharma, MD, 2009-2010, Mentor (Quality Improvement); community practice in California
- xviii. Kelley Ralph, MD, 2009-2010, Mentor (Quality Improvement); community practice in Indiana
- xix. Nicole Marie Braxely, MD, 2009-2010, Mentor (Quality Improvement); Emory University in Atlanta, Georgia
- xx. Jona Karlsson, MD, 2010-2011, Mentor (Quality Improvement); community practice in Atlanta
- xxi. Carl Nee-Kofi Mould-Millman, MD, 2010-2011, Mentor (Quality Improvement); University of Colorado
- xxii. Laura Towater, MD, 2010-2011, Mentor (Quality Improvement); community practice in Atlanta
- xxiii. Constantine Zaharis, MD, 2010-2011, Mentor (Quality Improvement); community practice in Florida

- xxiv. John Patrick Hill, MD, 2010-2011, Mentor (Quality Improvement); community practice in Georgia
- xxv. John Lemos, MD, 2010-2011, Mentor (Quality Improvement); Kaiser Permanente and UC-Davis Sacramento California
- xxvi. Holly Krysiak, MD, 2010-2011, Mentor (Quality Improvement); community practice in Georgia
- xxvii. Allen Chiem, MD, 2010-2011, Mentor (Quality Improvement); faculty at UCLA
- xxviii. John Weston, MD, 2011-2012, Mentor (Quality Improvement); community practice in Florida
- xxix. Sean Lowe, MD, 2011-2012, Mentor (Quality Improvement); community practice in Georgia
- xxx. Heidi Klein, MD, 2011-2012, Mentor (Quality Improvement); community practice in Georgia
- xxxi. Karim Ali, MD, 2011-2012, Mentor (Quality Improvement); community practice in Colorado
- xxxii. Tiffany Sanders, DO, 2011-2012, Mentor (Quality Improvement); community practice in Georgia
- xxxiii. Kimberly Gardner, MD, 2011-2012, Mentor (Quality Improvement); community practice in Texas
- xxxiv. Miriam Fischer, MD, 2011-2012, Mentor (Quality Improvement); faculty at Inova Fairfax Hospital
- xxxv. Rebecca Wurster, MD, 2011-2012, Mentor (Quality Improvement); community practice in Alaska
- xxxvi. Ashleigh Magill, MD, 2012-2013, Mentor (Quality Improvement); community practice in Carolinas Healthcare System, North Carolina
- xxxvii. Carli Blomquist, MD, 2012-2013, Mentor (Quality Improvement); community practice in Atlanta
- xxxviii. Louis, Ciardulli, MD, 2012-2013, Mentor (Quality Improvement); community practice in Atlanta
- xxxix. Steven Lindsey, MD, 2012-2013, Mentor (Quality Improvement); community practice in Atlanta
 - xl. Richard McCormick, MD, 2012-2013, Mentor (Quality Improvement); Assistant Medical Director, Camp Lejeune (Military) North Carolina
 - xli. Kimberly Clark, MD, 2012-2013, Mentor (Quality Improvement); community practice in North Carolina
 - xlii. Nicholas Byron Pitts, MD, 2012-2013, Mentor (Quality Improvement); community practice in Indiana
 - xliii. Ingrid Bloom, MD, 2012-2013, Mentor (Quality Improvement); faculty at Emory University Hospital
 - xliv. Ryan Stroder, DO, 2012-2013, Mentor (Quality Improvement); community practice in Texas
 - xlv. Preyasi Kothari, MD, 2012-2013, Mentor (Quality Improvement); community practice in Georgia
 - xlvi. Nadim (Mike) Hafez, MD, 2012-2013, Mentor (Career Choices); Faculty at University of Chicago

- xlvii. Nadria Gordon-Lyn, MD, 2012-2013, Mentor (Quality Improvement); community practice in Georgia
- xlviii. Douglas Chesson, MD, 2013-2014, Mentor (Quality Improvement); faculty at Emory University Hospital
 - xlix. Jeremy Nelson, MD, 2013-2014, Mentor (Quality Improvement); community practice in Atlanta
 - 1. Jean Wheeler, MD, 2013-2014, Mentor (Quality Improvement); critical care fellow at Emory
 - li. Juron Foreman, MD, 2013-2014, Mentor (Quality Improvement); community practice in Atlanta
 - lii. Megan Cloutier, MD, 2013-2014, Mentor (Quality Improvement); faculty at Emory University Hospital
 - liii. Susan Podolsky, MD, 2013-2014, Mentor (Quality Improvement); community practice in Atlanta
 - liv. Katie Dean, MD, 2013-2014, Mentor (Quality Improvement); community practice in Georgia
 - Iv. Bina Vasantharam, MD, 2013-2014, Mentor (Quality Improvement); community practice in California
 - Ivi. Dilani Weerasuriya, MD, 2013-2014, Mentor (Quality Improvement); community practice in Atlanta
 - Ivii. Joshua Reynolds, MD, 2016-2017, Mentor (Administrative Elective); resident in emergency medicine
 - lviii. Vanessa Cousins, MD, 2016-2018, Mentor (Administrative Elective); resident in emergency medicine
 - lix. Qasim Kazmi, MD, 2017-2020, Mentor (Administration); resident in emergency medicine
- c. Medical Students:
 - i. Dilani Weerasuriya, MD, 2010, Discovery; community practice in Atlanta
 - ii. Sean Bandzar, MD, 2011-2016, Mentor, (Research), resident in Emergency Medicine
 - iii. Julian Richardson, MD, 2015 2016, Emergency Department Research; resident in Emergency Medicine
- d. Entrepreneurial Mentorship:
 - i. Ana Gomez Del Campo, 2016 2021, Mentor; Health IT startup, Entrepreneur Georgia Tech Graduate

22. Lectureships, Seminar Invitations, and Visiting Professorships:

- a. National and International
 - i. Co-developer of the first Emergency Medicine Training Program in the People's Republic of Georgia. Certified the first ten emergency physicians in their country. People's Republic of Georgia. 2008 – 2009.
 - ii. America's Essential Hospitals. Discussion with Senior Aids to Federal Senators and Representatives regarding "DISH" funding and repealing of the Affordable Care Act. Washington DC. 2016
- b. Regional

- i. The State of Healthcare in the US, Live Healthy & Thrive Expo 2010
- ii. Assessment and Management of the Trauma Patient. Metro Atlanta Chapter of the Emergency Nurses Association, Grady Health System, Atlanta, GA 2014
- iii. Bridging the Gap Where Physical and Mental Health Collide. Creative Educational Unique (CEU) Concepts, Peachford Hospital, Atlanta, GA 2017
- iv. Covid: Lessons Learned. ApolloMD Southeast Medical Directors Weekly Operations Discussion, Atlanta, GA 2020
- v. What Is It Really Like On The Covid-19 Frontlines. Leadership Atlanta Health Alumni Program, Atlanta, GA 2020
- c. Institutional
 - i. Shock Made Ridiculously Simple, MD Showcase, Grady Memorial Hospital, Atlanta, GA 2008
 - ii. Pregnancy Complications, Mercer Physician Assistant Program, Atlanta, GA 2008 – Present
 - iii. Management of Asymptomatic Hypertension, MD Showcase, Grady Memorial Hospital, Atlanta, GA 2010
 - iv. Airway and Trauma Lectures, Emory University Emergency Nurse Practitioner Program. Atlanta, GA 2013-2014
 - v. The Affordable Care Act and the Future of Emergency Care, Georgia State University, Health Economics 2014
 - vi. Being a Doctor, Emory Scholarship and Service Program, Grady Memorial Hospital, Atlanta, GA 2014
 - vii. The Full Capacity Hospital, MD Showcase, Grady Memorial Hospital, Atlanta, GA 2015
 - viii. The Trauma Airway, Emory University Department of Surgery, Atlanta, GA 2016
 - ix. Psychiatric Emergencies in the Trauma Patient, Emory University Department of Surgery, Atlanta, GA 2016
 - x. ED Operations and Update, Emory University Department of Orthopedics, Atlanta, GA 2016
 - xi. Health Informatics on FHIR, Georgia Institute of Technology, Atlanta, GA 2017 present
 - xii. Advanced Practice Provider Onboarding, Emory University Woodruff Leadership Academy, Atlanta, GA 2018
 - xiii. Advanced Practice Provider Onboarding, Emory University WLA Breakfast and Leadership, Atlanta, GA 2018
 - xiv. Grand Rounds NFL Visiting Team Medical Liaison, Emory University Sports Medicine, Department of Orthopedics, Atlanta, GA 2019
 - xv. Medical Ethics Grand Rounds Panelist, Ethics During the Coronavirus Pandemic, Grady Memorial Hospital, Atlanta, GA 2020

23. Invitations to National/International, Regional, and Institutional Conferences:

a. National and International

- i. 5 Articles That Will Change Your Practice, Rocky Mountain Winter Conference, Copper Mountain, CO, 2012.
- ii. What you see is not always what you get? Common errors and their etiology in Emergency Medicine. Rocky Mountain Winter Conference, Breckenridge, CO, 2013.
- iii. Affordable Care Act The Future of Emergency Care, Rocky Mountain Winter Conference, Copper Mountain, CO, 2014
- iv. Introduction to Ballistics, Rocky Mountain Winter Conference, Breckenridge, CO, 2015
- v. Academic Emergency Department Design and Operations: Balancing Design, Flow and Education, Society for Academic Emergency Medicine Annual Meeting – Didactic Session, San Diego, California 2015.
- vi. The Top 10 Things an ED Medical Director Needs to Know Before Designing a New ED for American College of Emergency Physicians – Faculty presentation, Boston, MA 2015
- vii. The Amazing Results of Collaboration Between the Design Team and Clinical Leaders at Grady Memorial Hospital –International Summit & Exhibition on Health Facility Planning, Design and Construction (PDC), San Antonio, Texas, 2015
- viii. Partner Perspective: Grady Health Case Study. 'The Studer Group's Excellence in the Emergency Department, Las Vegas, NV. 2017
 - ix. Fixing Your Front End Reducing LWBS and Door to Doc, Rocky Mountain Winter Conference, Copper Mountain, CO, 2017
 - x. Pregnancy Complications, Rocky Mountain Winter Conference, Breckenridge, CO, 2018
 - xi. Managing the Flu Surge, Rocky Mountain Winter Conference, Steamboat, CO, 2019
- xii. Pregnancy Complications, Rocky Mountain Winter Conference, Breckenridge, CO, 2020
- xiii. Burn Basics for American College of Emergency Physicians Faculty presentation. ACEP Unconventional 2020 Annual Meeting.
- b. Regional:
 - 5th Annual State of the Art: Clinical Excellence in Emergency Care, Taught fiberoptic intubation as well as retrograde intubation, Emory University School of Medicine Emergency Department Atlanta, GA. 2005
 - 6th Annual State of the Art: Clinical Excellence in Emergency Care Director for airway workshop and taught fiberoptic intubation to attendees, Emory University School of Medicine Emergency Department Atlanta, GA. 2006
 - iii. Shock Made Ridiculously Simple, Georgia Association of Physician Assistants, Winter Conference, Atlanta, GA, 2011.
 - iv. Hypertension: "It's an emergency...wait, maybe not", Georgia Association of Physician Assistants Summer Conference, Destin, FL, 2012.
 - v. Surprise: What you see is not what you get, Georgia Association of Physician Assistants, Summer Conference, Destin, FL, 2012, 2015 -2016

- vi. The Tough Talk: Palliative Care in the Acute Care Setting, Georgia Association of Physician Assistants, Spring Conference Lake Lanier, GA, 2013
- vii. Oops...Common Errors in the Emergency Department and How to Avoid Them, Georgia Association of Physician Assistants, Summer Conference, Hilton Head, SC. 2013.
- viii. Sure I Can Swim...Drowning and Diving Emergencies. Georgia Association of Physician Assistants, Summer Conference, Hilton Head, SC, 2013.
- ix. I Got A Bum Knee, Georgia Association of Physician Assistants, Spring Conference, Lake Lanier Islands, GA, 2014.
- x. Pancreatitis: Not Just Booze and Stones. Georgia Association of Physician Assistants, Summer Conference, Destin, FL, 2014.
- xi. Safe Evaluation of Abdominal Trauma: Don't Leave Home Without It. Georgia Association of Physician Assistants, Summer Conference, Destin, FL, 2014
- xii. Triaging patient's in an overloaded hospital Panel discussion.
 Southeastern Critical Care Summit Conference Emory University School of Medicine Emergency Department Atlanta, GA. 2015
- xiii. Grady ED story about improvements in patient satisfaction and length of stay. 'The Studer Group's 13th annual What's Right in Health Care® Conference, Chicago, IL 2015
- xiv. The Overcrowded Hospital and How To Fix It, Georgia Association of Physician Assistants, Summer Conference, Destin, FL, 2016
- xv. Scenario Based Discussion Panelist, Explosion and Blast Injuries Course, Georgia Poison Center, Atlanta, GA, 2017
- xvi. Emergency Medicine Module Lecturer, Georgia Association of Physician Assistants, Summer Conference, Hilton Head, SC, 2019

24. Abstract Presentations at National/International, Regional and Institutional Conferences:

- a. National and International:
 - i. Utilizing patient simulation in the education of acute care nurse practitioners. (poster) *Julie Davey, Hany Atallah, Barbara Kaplan, Darla Ura. Emerging Technologies Conference, Seattle, WA, 2008.
 - Outcomes Due to Discrepancies in Emergency Department Radiology Reads at a Large Inner-city Hospital (oral) *C. Nee-Kofi Mould-Millman, Felicia King, Hany Atallah, Leon Haley. National Medical Association Annual Convention and Scientific Assembly. Las Vegas, NV, 2009.
 - Opening the Back Door of Emergency Department Improves Flow to Inpatient Setting but May Not Help with Overall Length of Stay (poster).
 Robin Hemphill, Daniel Wu, *Hany Atallah, Sally Santen, Leon Haley,

American College of Emergency Physicians Scientific Assembly, Las Vegas, NV, 2010.

- iv. Relationship Between Hospital Length of Stay and Door to Antibiotic Time in Pneumonia Patient in the Emergency Department: A Retrospective Study (oral). Dilani Weerasuriya, Debra Houry, Jeremy Hess, Daniel Wu, Leon Haley, *Hany Atallah, Society for Academic Emergency Medicine Annual Meeting, Boston, MA, 2011.
- v. Choice of Motorcycle Helmet Makes a Difference: A Prospective Observational Study (oral). *Brian Brewer, Albert Diehl, Laura Johnson, Hany Atallah, Jeffrey Salomone, David Feliciano, Grace Rozycki. Eastern Association for the Surgery of Trauma Annual Meeting, Scottsdale, AZ, 2013.
- vi. Patient Perceptions of Urgency, Costs, and Anticipated Wait Time: A Cross-Sectional Study in a Large Urban Academic County Hospital Emergency Department, *Hany Atallah, Moreed Khosravanipour, Lauren Daniels, Leon Haley, Daniel Wu, Sofie Morgan, Mabel Padilla, Gina Porter, Ryan Stroder, Jeremy Hess. Society for Academic Emergency Medicine Annual Meeting, Dallas, TX, 2014.
- vii. Epidemiology Of Pelvic Fractures In Elderly Women Presenting To United States Emergency Departments Between 2011 To 2013. (oral) Shabnam Gupta, Sean Bandzar, Hany Atallah. SAEM Mid-Atlantic Regional Conference at Washington, D.C, 2015
- viii. Epidemiology Of Pelvic Fractures In Elderly Women Presenting To United States Emergency Departments Between 2011 To 2013. (poster) Shabnam Gupta, Sean Bandzar, Hany Atallah. SAEM National Conference in San Diego, California 2015
- ix. Characteristics of United States Emergency Department Visits for Moped-Related Injuries from 2007 to 2013. (poster) Sean Bandzar, Shabnam Gupta, Hany Atallah. SAEM National Conference in San Diego, California 2015
- x. Epidemiology of Pediatric Traumatic Amputations Presenting to United States Emergency Departments, 2003-2013. (poster) Sean Bandzar, Shabnam Gupta, Hany Atallah. SAEM National Conference in San Diego, California 2015
- xi. The Application of Workflow Process Maps to a Pre-Hospital Acute Stroke Pathway: A Quality Improvement Initiative. (poster) Hany Atallah. International Stroke Conference. Houston, Texas. 2017
- xii. Wheatley M, Jeff-Eke M, Moran T, Moore B, Atallah H, Anderson A, Ross M, Osborne A. Use of Emergency Department Observation Unit for Management of Patients with Minor Stroke (Lightning Oral). Accepted to SAEM Annual Meeting, Denver, CO 2020 Meeting Cancelled due to COVID-19
- xiii. Madden LA, Hockstein M, Franczak M, Moore B, Ratcliff J, Strickler S, Nugent K, Atallah H, Tekwani S, Patel S. Assessment of a novel emergency department based critical care consult service in an urban level-1 trauma center. Digital Poster presented at: American College of

Emergency Physicians Scientific Assembly Research Forum; October, 2020.

- xiv. The Effects of the COVID-19 Pandemic on Emergency Department Volume and Acuity (oral). Society for Academic Emergency Medicine Annual Meeting, (Virtual), 2021.
- b. Regional:
 - i. *Atallah H, Haley L, Wu D. "Benzodiazepine Use for Acute Seizure Management in the Emergency Department", Regional Pharmacy Meeting April 2014, Atallah H, *Johnson O, Patka J.
 - Holmes J, Atallah H. "Trauma Intubations Performed by Emergency Medicine Residents at a Level 1 Trauma Center: Success Rates. M. Gage Ochsner Resident Paper Competition, Georgia Chapter, Committee on Trauma. 2014.

25. Research Focus

a. My research has focused primarily on emergency department operations. I have an interest in how hospital factors affect Emergency Department flow and how standardizing care pathways and optimizing processes can shorten Emergency Department length of stay.

26. Grant Support

- a. Federally Funded
 - i. PI, United States Agency for International Development, Partnership for International Development, \$900,000 grant, 2007-2009.
 - ii. Co-PI, Department of Defense Telemedicine and Advanced Technology Research Center. Electronic Health Record, \$1.6 million grant, 2009-2011.

27. Bibliography:

- a. Published and accepted research articles
 - i. Corbo J, Fu L, Silver M, Atallah, H., Bijur P. 2007. Comparison of laboratory values obtained by phlebotomy versus saline lock devices. Academic Emergency Medicine Journal. 2007Jan; 14 (1):23-7.
 - Robertson B, Atallah, H., Kaplan B, Higgins M, Lewitt MJ, Ander DS. 2010. The use of simulation and a modified TeamSTEPPS curriculum for medical and nursing student team training. Simulation in Healthcare Journal 2010; 5:332-337.
 - iii. Kaplan BG, Holmes L, Mott M, Atallah, H. 2011. Design and implementation of an interdisciplinary pediatric mock code for undergraduate and graduate nursing students. Computers, Informatics, Nursing Journal. 2011 Sep; 29(9):531-8.
 - iv. Atallah HY, Weerasuriya D, Hess J, Houry D, Wu D, Haley L.
 2013. Time to antibiotics and hospital length of stay in emergency department patients admitted for pneumonia: A retrospective, cross-sectional analysis. Universal Journal of Clinical Medicine.
 2013 Jul; 1 (1): 1-5.
 - v. Brewer BL, Diehl AH 3rd, Johnson LS, Salomone JP, Wilson KL, Atallah HY, Feliciano DV, Rozycki GS. 2013. Choice of

motorcycle helmet makes a difference: A prospective observational study. Journal of Trauma and Acute Care Surgery. 2013 Jul; 75 (1):88-91.

- vi. Eva K. Lee, **Hany Y. Atallah**, Michael D. Wright, Eleanor T. Post, Calvin Thomas IV, Daniel T. Wu, Leon L. Haley Jr. (2015) Transforming Hospital Emergency Department Workflow and Patient Care. Interfaces 45(1):58-82. <u>http://dx.doi.org/10.1287/inte.2014.0788</u>
- vii. Bandzar S, Vats A, Gupta S, Atallah H, Pitts S. 2015. Tricycle Injuries Presenting to US Emergency Departments, 2012-2013. Pediatrics. 2015 October; 136(4):658-63.
- viii. Atallah, HY, Magill AM, Moore B, Nelson J, McDaniel M. Case Report: Spontaneous Coronary Artery Dissection In a 30 Year Old Post-Partum Female. Journal of Hospital and Medical Management. Hospital and Medical Management. 2015 December; 1(1):1-4.
- ix. Okafor M, Wrenn G, Ede V, Wilson N, Custer W, Risby E, Claeys M, Shelp FE, Atallah H, Mattox G, Satcher D. Improving Quality of Emergency Care Through Integration of Mental Health. Community Mental Health Journal. 2016 April; 52(3):332-42.
- x. Bandzar S, Gupta S, Atallah H, Pitts S. Characteristics of United States Emergency Department Visits for Traumatic Amputations in the Elderly Adult from 2010 to 2013. Journal of the American Geriatrics Society. 2016 January; 64(1):181-5.
- xi. Gupta, Shabnam, Bandzar, S, Atallah HY. Atypical Presentation of Cervical Carcinoma with Cerebral Metastasis. Ochsner Journal. 2016. Winter;16(4):548-550.
- xii. Gupta S, Bandzar S, **Atallah H.** Increase in Moped Injuries Requiring Emergency Care. American Journal of Emergency Medicine. 2016 October; 34(10):2000-2002.
- xiii. Bandzar S, Gupta S, Atallah H. Epidemiology of Trauma-Associated Threatened Abortions Presenting to U.S. Emergency Departments from 2013 to 2015. Obstetrics and Gynecology. 2017 May; 129:38S.
- b. Symposium Contributions:
 - Milner JR, Shah MN. 2011. Special Issue: Proceedings of the 2011 Academic Emergency Medicine consensus conference: Interventions to Assure Quality in the Crowded Emergency Department. Academic Emergency Medicine. 2011 December; 18 (12); 1229-1401.
- c. Book Chapters:
 - i. Atallah, H. (2010). Thrombotic Thrombocytopenic Purpura. Rosen P (Ed.), <u>The Five Minute Emergency Medicine Consult</u>. 4th ed. (pp.1118-9): Baltimore, MD, Lippincott, Williams & Wilkins.

- ii. Atallah, H. (2010). Urethritis. Rosen P (Ed.), <u>The Five Minute</u> <u>Emergency Medicine Consult</u>. 4th ed. (pp.1170-1): Baltimore, MD, Lippincott, Williams & Wilkins.
- iii. Atallah, H. (2010). Tumor Compression Syndromes. Rosen P(Ed.), <u>The Five Minute Emergency Medicine Consult</u>. 5th ed. (pp.1162-3): Baltimore, MD, Lippincott, Williams & Wilkins.
- iv. Atallah, H. (2015). Thrombotic Thrombocytopenic Purpura. Rosen P (Ed.), <u>The Five Minute Emergency Medicine Consult</u>. 5th ed. (pp.1128-9): Philadelphia, PA, Wolters Kluwer Health.
- v. Atallah, H. (2015). Urethritis. Rosen P (Ed.), <u>The Five Minute</u> <u>Emergency Medicine Consult</u>. 5th ed. (pp.1180-1): Philadelphia, PA, Wolters Kluwer Health.
- vi. Atallah, H. (2015). Tumor Compression Syndromes. Rosen P(Ed.), <u>The Five Minute Emergency Medicine Consult</u>. 4th ed. (pp.1172-3): Philadelphia, PA, Wolters Kluwer Health.
- vii. Atallah, H. (2015). Pelvis. Sherman S(Ed.), <u>Simon's Emergency</u> Orthopedics. 7th ed. (pp.385-416): China, McGraw-Hill.
- viii. Lee, E, Atallah, H, Wright, M, Thomas, C, Post, E, Wu, D, Haley, L. Systems Analytics: Modeling and Optimizing Clinic Workflow and Patient Care. Yang, H, Lee, E(Ed.) <u>Healthcare Analytics:</u> <u>From Data to Knowledge to Healthcare Improvement</u>. 1st ed. (pp 299-340): Hoboken, NJ, John Wiley and Sons, Inc.
- ix. Atallah, H. (2018). Pelvis. Sherman S(Ed.), <u>Simon's Emergency</u> <u>Orthopedics</u>. 8th ed. (pp.pending): China, McGraw-Hill.
- d. Manuals, videos, computer programs, and other teaching aids:
 - i. Atallah, H., Kaplan, B., Ander, D., Robertson, B., (2009). Interprofessional Team Training Scenario. MedEdPORTAL: <u>http://services.aamc.org/30/mededportal/servlet/s/segment/mededportal/?subid=1713</u>
- e. Published Abstracts
 - Hemphill, R. R., D. Wu, H. Atallah, S.A. Santen, L. Haley. 2010. 184: Opening the Back Door of Emergency Department Improves Flow to Inpatient Setting but May Not Help With Overall Length of Stay. Annals of Emergency Medicine 56(3, Supplement 1): S61-S62.
 - Weerasuriya, D., D. Houry, J. Hess, D. Wu, L. Haley, H. Atallah, 2011. 460: Relationship Between Hospital Length Of Stay And Door To Antibiotic Time In Pneumonia Patients In The Emergency Department: A Retrospective Study. Academic Emergency Medicine 18(5, Supplement 1): S177.
 - iii. Brewer BL, Diehl AH 3rd, Johnson LS, Salomone JP, Wilson KL, Atallah HY, Feliciano DV, Rozycki GS. 2013. Choice of motorcycle helmet makes a difference: A prospect observational study. Journal of Trauma and Acute Care Surgery. 2013 Jul; 75 (1):88-91

- iv. Atallah H, Haley L, Wu D. 2014. Patient Perceptions of Urgency, Costs, and Anticipated Wait Time: A Cross-Sectional Study in a Large Urban Academic County Hospital Emergency Department. Academic Emergency Medicine Volume 21, Issue Supplement s1, pages S350–S364.
- v. Bandzar, S, Bandzar, A, Gupta, S, Atallah, H. 158 Epidemiology of Hoverboard Injuries Requiring Emergency Care. Annals of Emergency Medicine. 2016. 68. S62-S63.
- vi. Bandzar S, Gupta S, Atallah H. Epidemiology of Trauma-Associated Threatened Abortions Presenting to U.S. Emergency Departments from 2013 to 2015. Obstetrics and Gynecology. 2017 May; 129:
- vii. Kapil S, Hamm E, Atallah H, Zalesky C, Ahmad F, Ratcliff J, Moore B, Rhee P, Wheatley M. 2017. Observation of Minor Traumatic Brain Injury in Emergency Department Observation Units Significantly Reduces Length-of-Stay. Annals of Emergency Medicine 2017 October; 70(4): S131.

32. Contributions Not Otherwise Noted:

a. 1999 – Graduation Speaker, New York Medical College Commencement Carnegie Hall, New York, NY