

ADDENDUM TO SUBPOENA DUCES TECUM

- * 1. Any and all documents and/or tangible materials/medical records and tests which have been provided to you regarding any aspect of this case from any source. **THIS INCLUDES MEDICAL RECORDS FROM OTHER HEALTH CARE PROVIDERS.**
- * 2. Your entire file, including but not limited to, hard copies of e-mails sent and received, any and all reports generated and notes, handwritten or otherwise, graphs, computer printouts, all documents completed by the claimant and copies of tests and test results completed by your office or at your direction. **This includes computer printouts.**
3. All records of time spent by you or any member of your staff in connection with the work performed regarding this case. All records of charges for work performed or to be performed by you or any member of your staff in connection with the work performed regarding this case. - *see attached bill*
4. Your current curriculum vitae. *Attached*
5. Any and all publications in which the accepted principles (including basis for test administration and interpretation) and theories upon which you relied to reach your conclusion and opinions, including professional journals, text, or published position papers emanating from seminars and/or symposiums. *see CV*
6. Any and articles and published material authored by you, including the title, date and publishing company of any text, and the name and page numbers of any periodical which contains any article authored by you. *see CV*
7. The identity of other cases in which Dr. Richard Simon has testified as an expert in trial or deposition on behalf of The Law Group of Mendez & Mendez, P.A. and or Roberto Mendez. *attached*

* For #'s 1+2 - to copy the entire file
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ORTHOPAEDIC CENTER Of South Florida

Board Certified by the American
Board of Orthopaedic Surgery

CURRICULUM VITAE

Bruce M. Berkowitz, M.D.

Orthopaedic Surgery
Sports Medicine & Arthroscopy

Brad S. Chayet, M.D.

Orthopaedic Surgery
Sports Medicine & Arthroscopy

Phillip B. Cummings, M.D.

Hand Surgery, Microvascular Surgery
& Elbow Surgery

Stephen J. Jacobs, M.D.

Orthopaedic Surgery & Arthroscopy
Sports Medicine & Reconstructive Surgery

Kenneth L. Jarolem, M.D.

Spinal Surgery
Orthopaedic Surgery

Richard M. Linn, M.D.

Orthopaedic Surgery
Arthroscopic & Reconstructive Surgery

Marisel Medina, D.P.M.*

Podiatric Medicine & Surgery

Audie M. Rolnick, M.D.

Orthopaedic Surgery
Arthroscopic & Reconstructive Surgery

Richard J. Simon, M.D.

Orthopaedic Surgery
Sports Medicine & Arthroscopy

Douglas R. Stringham, M.D.

Orthopaedic Surgery
Sports Medicine & Arthroscopy

Telephone: (954) 473-6344

Fax: (954) 473-2603

Toll: 800-55-ORTHO

* Board Eligible

RICHARD J. SIMON, M.D.

BUSINESS ADDRESS:

Orthopaedic Center of South Florida
600 South Pine Island Road, Level 3
Plantation, Florida 33324
Telephone: 954-473-6344

EDUCATION - PRE-MEDICAL

Ohio State University
Columbus, Ohio

B.S. Zoology, 1977-1981

MEDICAL

Ohio State University College of Medicine
Columbus, Ohio

M.D., 1981 - 1985

PROFESSIONAL

INTERNSHIP:

Albert Einstein Medical Center
Department of General Surgery
Philadelphia, Pennsylvania
Robert Somers, M.D., Director

July 1985 - June 1986

MAIN OFFICE

600 S. Pine Island Rd., Ste. 300
Plantation, FL 33324

EAST OFFICE

1414 S. East Third Ave.
Ft. Lauderdale, FL 33316

PALM BEACH OFFICE

15127 Jog Rd., Ste. 209
Delray Beach, FL 33446

TAMARAC OFFICE

7171 N. University Dr., Ste. 100
FT. LAUDERDALE, FL 33321

MIAMI OFFICE

1479 NW 27 Avenue
Miami, FL 33125

RESIDENCY:

Albert Einstein Medical Center
Department of Orthopaedic Surgery
Philadelphia, Pennsylvania
Milton A. Wohl, M.D., Chairman

July 1986 - June 1990

Shriner's Hospital for Crippled Children
Philadelphia, Pennsylvania
Michael Clancy, M.D., Chief of Staff
Howard H. Steel, M.D., Chief Emeritus

July 1988 - January 1989

Jefferson Hand Rehabilitation Center
Philadelphia, Pennsylvania
James Hunter, M.D. Director

March 1989 - July 1989

FELLOWSHIP:

Cincinnati Sports Medicine Center
Sports Medicine Fellowship
Cincinnati, Ohio
Frank R. Noyes, M.D., Director

July 1990 - June 1991

CERTIFICATION BY AMERICAN SPECIALTY BOARDS:

Diplomate, National Board of Medical Examiners

Certification No. 307865

Diplomate, American board of Ortho Surgery

July 9, 1993

Fellow, American Academy of Orthopaedic Surgery

February 1995

Member, American College of Sports Medicine

June 2003

STATE LICENSURE:

Florida 1991

No. ME 60163, Active

PRESENT HOSPITAL AFFILIATIONS

Westside Regional Medical Center
8201 West Broward Boulevard
Plantation, Florida 33324

Surgery Center of Fort Lauderdale
4485 No. State Road 7
Lauderdale Lakes, Florida 33319

TEAM PHYSICIANS AFFILIATIONS

United States Soccer Federation
Men's & Women's World Cup Teams
Orthopedic Consultant
1995-Present

Miami Fusion, F.C.
Major League Soccer
Head Team Physician
1997-1998

1996 Olympics
South Florida Soccer
Chief Medical Officer
Orange Bowl, Miami, Florida

Umbro Select Soccer
College All-Star Tournament
Medical Director
Ft. Lauderdale, Florida 1996-1999

Disney Marathon
Medical Volunteer
Orlando, Florida

1996 M.L.S. Player's Combine
Orthopaedic Consultant
Ft. Lauderdale, Florida

Fort Lauderdale Strikers
American Professional Soccer League
Plantation High School
Plantation, Florida

Barcelona Dragons
World Football League
1991 - 1992

Canadian National Soccer Association
World Cup Team
Orthopedic Consultant
1996-Present

America's Red Clay Tennis Championship
ATP Event Medical Director
Coral Springs, Florida
1992-2001

Ft. Lauderdale Dive Team
Orthopaedic Consultant
Ft. Lauderdale, Florida

USA Diving
Orthopaedic Consultant

A.T.P. Challenge Cup Tennis Tournament
Pembroke Pines, Florida
October 1991

Broward Community College
Fort Lauderdale, Florida
South Plantation High School
Plantation, Florida

Advanta Senior Professional Tennis
Eagle Trace Country Club
Coral Springs, Florida
December 1992

PRESENTATIONS:

The Elbow and Forearm Department of Sport and Exercise Sciences Barry University, Miami, Florida	November 1996
Treatment of Shoulder and Elbow Arthritis Arthritis Foundation Symposium Barry University, Miami, Florida	February 1995
Ankle Injuries in Athletes Broward County Athletic Trainers Annual Meeting Plantation, Florida	May 1993
Field Decisions: Diagnosis in Football Broward County Athletic Trainers Annual Meeting Plantation, Florida	April 1993
Shoulder Instability: Evaluation & Treatment Principles Miami Sports Medicine Seminar/Lipton International Tennis Tournament, Coconut Grove, Florida	March 1992
High Tibial Osteotomy & Ligament Reconstruction in Varus Angulated A.C.L. Deficient Knees AAOS Washington, D.C.	February 1992
Difficult Cases Involving ACL Deficient Knees Cincinnati Sports Medicine Knee and Shoulder Courses Hilton Head Island, South Carolina	May 1991
Review of Treatment of Ankle Fracture Temple University/Albert Einstein Medical Center Grand Rounds, Philadelphia, Pennsylvania	January 1990
Diagnosis and Treatment of Patellofemoral Joint Pain Temple University/Albert Einstein Medical Center Grand Rounds, Philadelphia, Pennsylvania	March 1989
Treatment of Pediatric Femur Fractures Utilizing an Ambulatory Spica Cast, NY, NJ, PA, Aruba, Netherland Antilles Orthopaedic Society Spring Meeting	April 1988
Treatment of Pediatric Femur Fractures Utilizing an Ambulatory Spica Cast, A.O.A Resident's Conference Boston, Massachusetts	February 1988
Benign Osseous Tumors: Diagnosis and Treatment Temple University/Albert Einstein Medical Center Philadelphia, Pennsylvania	January 1988
Osteomyelitis Temple University/Albert Einstein Medical Center Philadelphia, Pennsylvania	March 1987

PUBLICATIONS:

Noyes, F. Simon, R.J.: High Tibial Osteotomy and Ligament Reconstruction in Varus Angulated A.C.L. Deficient Knees: A Two to Seven Year Follow Up.

American Journal of Sports Medicine, Vol. 21, No. 1 (1993) P. 2 - 12.

Simon, R.J., Guttman, G.G.: "Treatment of Pediatric Femur Fractures Utilizing an Ambulatory Spica Cast." Journal of Pediatric Orthopaedics, Volume 8, No. 6 (1988) 699 - 704.

Guanche, C., Rubenstein, D., Kovalsky, E., Simon, R.J., Wohl, M.A.: Effects of Traction and Intramedullary Rodding on Thigh Compartment Pressures.

Submitted to Clinical Orthopaedics and Related Research for publications.

TEXTBOOK CHAPTER

"Orthopaedic Sports Medicine: Principles and Practices", Editors Jesse De Lee, M.D. and David Drez, M.D., The Role of high tibial osteotomy in the varus angulated A.C.L. deficient knee. Authors: Frank Noyes, M.D., Richard Simon, M.D., Section J - Pgs 1401 - 1444

RESEARCH

Basic Science Research Laboratory Technician
Cleveland Clinic Foundation
Cleveland, Ohio

1978, 1979, 1980, 1982

**INTERROGATORIES
RICHARD J SIMON M.D.
DEPOSITIONS**

CHART #	PATIENTS NAME	DEFENSE ATTY	PLAINTIFF ATTY	DATE OF SERVICE
253744WC	DANIEL CROOKER	May Porraspita	Robert Friedman	10/26/06
261682IME	MICHAEL DEMBIN	Sam Hill	*Michael Davis	11/09/06
261278WC	DIANA WINSETT	Rogers Turner	*Paul Morgan	12/07/06
225343SO	ALICE NKOUMAH BOANWO	Daniel Frastai	Charles Bloom	01/04/07
258534IME	JAMES RICHARDSON	Greg Anderson	*Michael Long	01/11/07
262441IME	JUDITH BENSE	Ashley Hattaway	*Rodrigo Saavedra	01/18/07
206927WC	VINCENT GOVERNALE	David Stone	Steven Friedman	01/25/07
265557IME	CARMAN BOALCH	Robert Mendez	Nick Panebianco	03/01/07
245123IME	ANDREW MYERS	Lisa Baligian	Alexander Kaplan	03/08/07
267731IME	SERGIO HELIODORO	Margie Sachs	David Cohen	03/22/07
259735IME	CYNTHIA MARTIN	Sheri Critelli-Fabiano	Adam Hurtig	03/22/07
224626IME	ALFONSO CAMPOS	Stephanie Robinson	Richard Zaldivar	03/29/07
264753IME	GREGOIRE CIDOINE	Holly Hawn	Robert McFann	03/29/07
248653IME	ALFONSO SALAMANCA	Jay Siegel	David Cohen	04/12/07
161887WC	DESILIEN CERANT	Randall Baisden	Arlene Franconero	04/26/07
265696IME	ROBIN SILVANI	Erik Grindal	Esther Ruderman	05/31/07
270035IME	DENNIS SCHUMACHER	Michael Celeste	Roberto Mendez	06/07/07
267903IME	CONDIT ATKINSON	Jeffrey Ryan	*Michael Long	06/14/07
262527IME	DENISE ORTIZ	Mark Baxter	*Scott Smith	07/19/07
272966WC	HAROLD DOW	Stephanie Robinson	Eric Berger	07/26/07
196039AA	LHOUSSAINE FOUISSI	Michael Schwartz	*Michael Bendell	08/09/07
216996IME	DARLENA DAVILA	Robert Mendez	Peter Schweddock	08/23/07
245127SO	NEVILLE BERNARD	David Halpern	Richard Zaldivar	08/30/07
258089IME	MIRTA BLANCO	Robert Mendez	Barry Pensler	09/06/07
271948IME	TERECITA DOOLEY	Angelina Capece	*Matthew Levy	09/06/07
196039AA	LHOUSSAINE FOUISSI	Michael Schwartz	*Michael Bendell	10/08/07
180901IME	HAROLD JONES	Alison Schefer	Barry Keyfetz	10/18/07
253409IME	ETHEL BURNS	Ray Alvarez	Barbara Waggenheim	10/18/07
270260IME	ALEJANDRO CABRERA	Robert Mendez	Robert Rampil	10/25/07
276352IME	PERVEEN AHMED	Robert Mendez	David Cohen	10/25/07
251451WC	RICHARD BYRNE	Robert Mendez	Nick Panebianco	11/01/07
272060IME	ALIXEY SWIDIN	Cymonie Rowe	Kathryn Lee	11/01/07
231375SO	JENNIFER MCFAYDEN	Jerry Hayden	Mark Dickstein	11/15/07
196039AA	LHOUSSAINE FOUISSI	Michael Schwartz	Michael Bendell	11/29/07
267768WC	MICHAEL HARLEY	Kurt Wyland	Gloria Pomerantz	12/20/07
273272IME	SHARON PERRY	Mark Hruska	Todd Falzone	01/03/08
272074IME	MARIO DURAN	Alison Rosenberg	Richard Zaldivar	01/10/08
150051WC	GABRIEL CHARLOT	Walter Wyatt	William Souza	01/31/08
274797IME	BEVERLY RICHARDS	Luis Del Nodal	*Peter VanKeuren	02/28/08
258230WC2	BENSON JOSEPH	Brenda Emery	Jesse Bernheim	04/03/08
213196IME	ROBERT TEDESCO	Eric Price	William Souza	04/10/08
231375SO	JENNIFER MCFAYDEN	Jerry Hayden	Mark Dickstein	04/17/08
222679WC	RICHARD SCHWARTZ	David Stone	*Cesar Armstrong	05/15/08
279926IME	RAFAEL FERNANDEZ	Robert Mendez	Edward DeVarona	05/22/08
283522IME	MARY QUEVEDO	Carlos Valasquez	*Mario Perez	05/22/08
268461WC	SCOTT DENT	Stephanie Robinson	David Evoy	06/19/08
228809IME	REINALDO LEYVA	Gregory Coican	Richard Zaldivar	06/26/08
285232IME	DANIEL SHEEHAN	Scott Silver	Lorri Kennedy	07/03/08
271353IME	JOANNE COLUCCO	Sheri Critelli-Fabiano	*Sam Guelli	07/24/08

(*):indicates plaintiffs' request

**INTERROGATORIES
RICHARD J SIMON M.D.
DEPOSITIONS**

277591IME	MARIA NOWACKI	Robert Mendez	Charles Thomas	07/31/08
269037WC	LONETTE AVERY	Jorge Pena	Jason Barnett	08/07/08
274656IME	PEACHES MORGAN	Richard Llerena	*Richard Schuler	08/07/08
282336IME	ANNETTE GOODWIN	Robert Mendez		08/14/08
281774IME	LORENZO URBINA	Jesus Revalo	Caroline Friedman	08/28/08
283639IME	ALI KATUK	Robert Mendez	Juan Carlos Perez	09/04/08
286341IME	CAESAR ORTIZ	Robert Mendez	Michael Stauder	09/04/08
288438IME	GEOFFREY NASH	Jill Strommen	*Jay Halpern	10/16/08
288438IME	GEOFFREY NASH	Jill Strommen	Jay Halpern	10/16/08
113192AA	LOIS CAPTAIN	Arron Sobel	*Robert Hoag	10/30/08
282942IME	DELICIA JANIVERE	Jeffrey Johnson	*Theodore Enfield	11/04/08
288205IME	TIMOTHY WALKER	Robert Mendez	Edward Schuster	11/13/08
286341IME	CAESAR ORTIZ	Robert Mendez	Michael Stauder	11/13/08
284381IME	GLORIA HEREDIA	Jesus Revalo	Richard Zaldivar	11/20/08
279315IME	CORRINE BUSTANI	Jeffrey Ryan	*Jason Weisser	12/04/08
288330IME	LEONARDO HENAO	Robert Mendez	Richard Dolan	01/15/09
290332IME	MARIA JUAREZ	Jesus Revalo	Peter Schweddock	01/22/09
286787EX	BARRY JEAN BAPTISTE	Michael Carney	*Lewis Jacks	01/22/09
240770AA	ANTHONY MACK	Rashad El-Amin	Robert Nichols	01/29/09
280562IME	ODILE GOURDET	Jeffrey Hickman	William Ruggiero	02/12/09
257956SO	DENNIS MOORE	Michael Ring	Eric Berger	02/19/09
290883IME	LYUBOMIR BOGDANOV	Robert Mendez	Lewis Niad	03/19/09
287927IME	RAYMOND STRACK	Alexander Almazan	*Mario Perez	03/26/09
285433SO	CARL THEBEAU	Thomas Cox	Andrea Wolfson	04/02/09
273681IME	RICHARD LUCHIK	David King	*Casey Fundaro	04/09/09
273882IME	SUSAN LUCHIK	David King	*Casey Fundaro	04/09/09
290542WC	ANDRE WILLIAMS	Rochelle Lefler	Michael Celeste	04/16/09
293708IME	JOSE TORRES	Robert Mendez	David Benenfeld	04/23/09
176477IME	JOHN FORD	Maximo Santiago	Brett Anderson	05/14/09
279315IME	CORINNE BUSTANI	Jeffrey Ryan	Jason Weisser	05/21/09
154550IME	LAWRENCE WIDLAK	Edward Schuster	William Souza	05/28/09
286358IME	SHARON FERRIS	William Foman	William Pruitt	06/02/03
228809IME	REINALDO LEYVA	Gregory Coican	Richard Zaldivar	06/18/09
294010IME	DANIEL PAJARON	Luis Estrada	Mario Arrango	06/18/09
290124IME	REYNA OROZCO	Daniel Simpson	Brahm Gechtman	07/02/09
291142IME	HADEER MOUSTAFA	Vanessa Casullo	*Sam Guelli	07/02/09
293359IME	ANNA COLES	Basel Zacur	Hyrarn Montero	07/30/09
293932SO	ROSA DOMINGUEZ	Debrah Antel	*Rodrigo Saavedra	08/06/09
286709WC	FIOR ALMONTE	Michael Fichtel	Steven Miller	08/20/09
296116IME	VICTOR RIVERA	Basel Zacur	James Knight	08/27/09

89 dep
 16 July
 No (17) Impe
 3/1/07
 8/27/09

Richard J. Simon, MD
Trials

TRIAL DATE	PATIENTS NAME	ACCOUNT	REQUESTING ATTY	CASE STYLE	RESIDING JUDGE	TREATING OR IME PHYSICIAN
10/25/2006	RICHARD MEEHAN	261421IME	Marc Ruderman	Richard Meehan v Kimberly Taplin	Judge Amy Smith	IME Physician
3/13/2007	ANGEL ROBLES	252951IME	Sheri Critelli-Fabiano	Angel Robles v Robert Petronella	Judge Victor Tobin	IME Physician
5/24/2007	BILLY SINFLORANT	238183IME	David Strong	Billy Sinflorant v Envoy Vallinteno & Ailstate Ins Co	Judge Carol Lisa Phillips	IME Physician
7/12/2007	TANIOS CHAMOUN	233206IME	Anne Ryan	Tanios Chamoun v Scott Lyons & Bradley Drake	Judge Robert Andrews	IME Physician
9/19/2007	STEVEN MIDLARSKY	265957IME	Charles Benson	Steven Midlarsky v marilena Cerrito, Maria Gaudio & Geico	Judge Robert Carney	IME Physician
10/15/2007	SILIS SENCION	272718OME	William Foman	Silis Sencion v Geico	Judge David French	IME Physician
11/14/2007	SEAN O'REILLY	275498IME	Kenneth Moffet	Sean O'Reilly v Mastec N.America	Judge David French	IME Physician
4/24/2008	TANIOS CHAMOUN	233206IME	Anne Ryan	Tanios Chamoun v Scott Lyons & Bradley Drake	Judge Barry Goldstein	IME Physician
5/1/2008	WILLIAM CINTRON	277543IME	Kevin Beuttenmuller	William Cintron v Stephen Roberts	Judge Edward Fine	IME Physician
5/1/2008	EVARISTA MARCIAL	277544IME	Kevin Beuttenmuller	William Cintron v Stephen Roberts	Judge Edward Fine	IME Physician
5/6/2008	TAWUANA FORD	233227IME	Michael Carney	Tawuana & Dwayne Ford v Rachel Gregg	Judge Leroy Moe	IME Physician
7/25/2008	LORRAINE BODEK	264028IME	Jami Gursky	Lorraine Bodek v Laguna Pointe Condo Assoc	Judge Kevin Emas	IME Physician
11/12/2008	LUZ SOLARTE	288090IME	Harlan Gladstein	Solarate v Ditri	Judge Peter Weinstein	IME Physician
1/21/2009	AMANDA DAWKINS	283870IME	Dolina Lordeus	Dawkins v Fagin	Judge John Luzzo	IME Physician
3/3/2009	JOHN CURRAN	289750IME	Richard Nelson	John Curran v Diane Little	Judge Jack Tuter	IME Physician
8/19/2009	SUSAN LUCHIK	273682IME	Misty Taylor Chaves	Susan Luchik v Squire	Judge Jack Tuter	IME Physician