



Comes Now, Plaintiff Laura Lynn Hammett who in support of the above titled motion states:

The Court made an order on April 26, 2022 that seemed to restrict the parties from filing any further motions until further notice. Plaintiff is not clear on what the limitations are and when the Court will lift them.

Plaintiff has a pending motion to exclude Dr. Adhia's testimony based on his grossly insufficient initial report.

Defense "expert" Dr. Sanjay Adhia gave Plaintiff an intrusive and disturbing medical exam on May 6, 2022. On May 17, 2022 Plaintiff received the report which was inaccurate, deceitful and distressing. One point is that Dr. Adhia continues to insist that the exam is not confidential, which increases Plaintiff's anxiety. Dr. Adhia elicited disclosure of traumatic events that Plaintiff has shared with no one else, regardless that the details of what caused PTSD are not relevant (according to Plaintiff's therapist).

Dr. Adhia misdiagnosed Plaintiff in contradiction to the robust medical history provided for his review.

Plaintiff turned to the Arkansas Medical Board to see what could be done and found that Dr. Adhia is not licensed in Arkansas and is not allowed to make a diagnosis. He is allowed to only review records of licensed health care providers.

Plaintiff's Motion For Written Clarification of Scheduling Order Made April 26, 2022 in Hearing; Alternatively, Leave to File Motion in Limine to Exclude "Expert" Testimony and Report of Dr. Sanjay Adhia and Supplemental Complaint

Therefore, Plaintiff hopes to file a motion in limine to exclude any opinion and any “test” results by Dr. Adhia. Additionally, Plaintiff asks that she be able to call Dr. Adhia as a fact witness and call her current therapist who wrote the expert witness rebuttal as an expert.

Plaintiff is also considering filing a second suit against Defendant PRA and joining Dr. Adhia and his practice group. For judicial economy, Plaintiff prefers to file a motion to allow her to supplement the present complaint instead. The causes of action being: Abuse of Process, IIED- Outrage and Invasion of Privacy on Seclusion.

The barebones fact set that Plaintiff hopes to expand upon and brief: Dr. Adhia is a hired gun. He advertises on the internet that he practices nationwide. If allowed to testify in this case, about 17% of his testimony will be in Arkansas. Dr. Adhia has applied and been granted a provisional license to work in another state, so he knows he must follow each state’s protocol. He may not be granted a license in Arkansas because of his poor track record in other states and he went to medical school in India, though he claims to be born in Michigan.

Dr. Adhia was grossly inaccurate in his report. He failed to administer the accepted tests for the ailment he diagnosed and for the ailments Plaintiff’s providers diagnosed. He contradicted his own opinions stated in his published

opinions, prior reports and research listed on his CV, (the Cedars-Sinai research was complete before his Texas licensure).

PRA through counsel expressed to one of Plaintiff's medical care providers that it intended to settle, and therefore did not depose the doctor when the doctor showed up pursuant to a subpoena.

Dr. Adhia advertises that his reports have convinced the opposing party to give up. In fact, Plaintiff was so upset after reading Dr. Adhia's report, that she made a settlement offer for half her last offer. PRA did not acknowledge receiving the offer. That was before discovering Dr. Adhia is not allowed to diagnose in Arkansas and the offer was revoked already.

Plaintiff certifies that she contacted counsel for PRA by email numerous times on June 16 and 17 and even 19<sup>th</sup>, 2022 in hope of meeting and conferring on these issues. In response, there has been radio silence.

Dated June 21, 2022



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**CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2022, a true and exact copy of the foregoing was filed with the Clerk of the Court for entry on the electronic filing system which will cause service upon all counsel of record via email.

A handwritten signature in black ink that reads "Laura Hammett". The signature is written in a cursive style and is positioned above a horizontal line.

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### Testimony History

- 1) State of Oregon vs. Zachary Michael Guzman; Competency to Stand; Expert from the Oregon State Hospital; Malheur County Courthouse Vale, Oregon; 2/26/14
- 2) State of Georgia vs. Natasha Newman; Driving Under the Influence; Defense Expert; Fulton County Court, Atlanta Georgia; Defense Expert, 2/6/19
- 3) *In Re: Estate of Shirley L. Wiatrek*, deceased; Cause No. 2020-005; County Court of Karnes County, Texas; Testamentary Capacity; Contestant's expert; 6/5/20  
PR-2019-0025
- 4) *In re: Estate of Jack McClure, Deceased*; Cause No. PR3933, In the County Court at Law Number Three, Brazoria County, Texas; Undue/Influence Testamentary Capacity; Contestant's expert; 8/03/21
- 5) *Texas Medical Board vs. Arthur Arrit Chavason, M.D.*, SOAH DOCKET NO. 503-19-2484; Defense expert, physician boundary violations, 9/23/21

### Deposition History

- 1) *Baldwin v. Harris County Sheriff Department et al*, No. 4:2016cv02966 Plaintiff's Expert; US 1983 Civil Rights; 11/15/18
- 2) *Estate of Wilma Thomason v. SRP, Ocean*, Plaintiffs' Expert; Medical Malpractice; 12/13/18
- 3) *Mario Parra Fenech vs Rama Indigo Falls, LLC d/b/a Cabo San Lucas II Apartments*, Case #: 2017-373350; Plaintiff's Expert, Personal Injury; 3/13/20
- 4) *In Re: Estate of Shirley L. Wiatrek*, deceased; Cause No. 2020-005; County Court of Karnes County, Texas; Testamentary Capacity; Contestant's expert; 5/7/20
- 5) *First Unum Insurance Company of America v. Rucker et al*, Case Number: 4:2020cv00181, US District Court for the Southern District of Texas; Plaintiff's expert, Contestant's Expert, Capacity to Designate Life Insurance Beneficiaries, 9/10/20
- 6) *Texas Medical Board vs. Arthur Arrit Chavason, M.D.*, SOAH DOCKET NO. 503-19-2484; Defense expert, physician boundary violations, 1/28/21



- 7) *The Estate of Dontrell Taquon Mundine-Williams vs. Illinois Department of Corrections, John R. Baldwin, and Wexford Health Sources, INC*, No. 3:19-cv-00739-SMY-MAB; plaintiff's expert, Correctional Suicide, 3/5/21
- 8) *Michelle Dotson et al v. Bexar County et al*, Cause No. 5:19-cv-00083-XR; plaintiff's expert, Jail death, 3/25/21
- 9) *James Edward Noel vs. BP Exploration & Production, Inc. and BP America Production Company* Civil Action No. 1:19-Cv-00694 United States District Court Southern District of Alabama (Mobile) Related to: 12-968 BELO in MDL No. 2179; plaintiff expert, 12/9/21