

Checklist: What a Medical Expert Needs

To get the most for money you spend on a defense medical expert, collect everything he needs to see and submit it together, clearly marked for easy reference in telephone conversations with the attorney. Include, in chronological order:

Law Enforcement

- ___ Police reports
- ___ 911 tape
- ___ Video statements
- ___ Scene photos or video if available

Child Protection Services

- ___ All child protective services reports concerning the family

Hospital (if more than one hospital, keep records separate)

- ___ Emergency Medical Services or ambulance records
- ___ Admission sheet and emergency room admission record
- ___ History and physical
- ___ Discharge records
- ___ Consults, especially ophthalmology consults. Ask for fundoscopic photographs specifically.
- ___ Doctors' progress notes
- ___ Nurses' notes
- ___ Operative notes
- ___ Radiology reports (CT and MRI reports) in chronological order. Make sure the report for the first scan is included.
- ___ Lab reports in chronological order. Hematology, chemistry, bacteriology, etc.
- ___ Medication records
- ___ Doctors' orders
- ___ Ventilation records
- ___ Physical therapy records (input, output, etc.)
- ___ Photographs taken at the hospital

- ___ CT scans and X-rays, on CD if done digitally and copies of films if not. Do not scan films onto CDs. The defense doctor will need to look at the exact images reviewed by the prosecution doctors.
- ___ Post-discharge information (if the child survives)

Prior Records

- ___ Prenatal records for the mother
- ___ Birth records for both mother and baby
- ___ Infant doctor visits, especially any shortly before the child's collapse
- ___ Medical records of siblings. Be careful to keep these separate from the baby's records.

Medical Examiner or Coroner's Reports

- ___ Autopsy report, including diagrams and notes
- ___ Histology (may be handwritten)
- ___ Neuropathology report, both gross and microscopic
- ___ Eye report, including copies of photographs and recuts of the eye slides
- ___ First call sheet and investigator's report
- ___ Receipts for evidence
- ___ Death certificates, both temporary and final
- ___ Autopsy photographs, including prints, and if taken digitally, digital images as well.
- ___ Copies of X-rays taken prior to autopsy.
- ___ Autopsy histology slides and if possible, unstained slides of the brain, especially the dura mater.
- ___ Read the autopsy report to ensure that you have *all* consultation reports. There may be others not mentioned above (heart, etc.)

Get everything you *can*. If something is missing, include a page saying what you have done to try to get it and why it's not there. Compile all records in order. Tab each section, including each hospital. Number all pages consecutively with colored ink.