

21 Mr. Alexander Neustadter for any specific length of  
22 time doing the things you record here in this note?

0029

1 A I don't remember today.

2 Q Did you write down in this note everything  
3 that was important about this incident?

4 MS. WARD: I'll object to the form of the  
5 question, but you can answer.

6 A Yes.

7 Q You next wrote "the son stated that he had  
8 given patient apple juice and ice," right?

9 A Yes.

10 Q You didn't write down that you had seen  
11 him doing that; is that correct?

12 A Yes.

13 Q You didn't actually see Mr. Neustadter  
14 giving either ice chips or apple juice to his  
15 father, did you?

16 MS. WARD: I'm going to make the same  
17 objection. She's already told you she didn't  
18 remember the patient or the son. But with  
19 that, go ahead.

20 A Say that again?

21 Q Okay. Let me ask it this way. Would it  
22 have been an important fact to record if you saw the

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1 son giving ice chips or apple juice to his father?

2 MS. WARD: Object to form. You can  
3 answer.

4 A Yes.

5 Q Assuming that you had seen that, would you  
6 have recorded that you saw that in the note?

7 A Yes.

8 Q Next, you said, "Respiratory called and  
9 100 percent mask applied." Is that something that  
10 you did?

11 A It looks like I called the respiratory  
12 department, and they came and put a 100 percent mask  
13 on him.

14 Q That was my question. You didn't do that?  
15 You didn't put the 100 percent mask on him?