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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 17-CV-00884-CMA-STV

DEPOSITION OF: ERIN CARNAHAN - June 3, 2019

CHAYCE AARON ANDERSON,

Plaintiff,

v.

JASON SHUTTERS,

Defendant.

PURSUANT TO NOTICE, the deposition of ERIN CARNAHAN was taken on behalf of the Plaintiff at 1024 South Lemay Avenue, Fort Collins, Colorado 80524, on June 3, 2019, at 11:09 a.m., before Lisa B. Kelly, Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within Colorado.

1 authorized to make independent decisions about
2 treatment for patients?

3 A. Yes.

4 Q. And, again, with the same sort of caveats
5 about having a physician sign off?

6 A. That's correct. That's correct.

7 Q. All right. Now, it looks like you have
8 Exhibit 15 in front of you. And if you just want to
9 take a second to look at it. I'm just going to ask
10 you if you recognize that document.

11 A. This is -- yeah. This is the note that I
12 had from the 2015 -- August 28, 2015.

13 Q. Okay. And this was the note for Chayce
14 Anderson?

15 A. Yes. That's the name on the top of
16 the -- I assume, yeah.

17 Q. Okay. Can you tell me what you remember
18 about August 28, 2015?

19 A. I do not remember anything about
20 August 28, 2015.

21 Q. Can you tell me if you remember anything
22 about Mr. Anderson's medical care?

23 A. I do not remember anything about this
24 patient.

25 Q. So anything that you would know about

1 this patient would just be what you would read from
2 the record?

3 A. Yes. I've seen thousands of patients
4 since this time, so it's hard to remember one, unless
5 it stands out, and this one does not stand out in my
6 memory.

7 Q. Fair enough. All right. Well, let's
8 just take a look really quickly at this record just to
9 understand it, and hopefully we can let you go.

10 All right. So if you turn to -- well,
11 there are two page numbers at the bottom. I'm going
12 to refer to the ones that say "Anderson."

13 A. Okay.

14 Q. So Anderson 13. It's actually the
15 first -- probably the first page.

16 A. Okay.

17 Q. Yep. And I just want to understand,
18 where is all this information -- who entered this
19 information? Let's look specifically at the patient
20 information section.

21 A. The patient information is going to be --
22 so we have a PAR, that's actually in the emergency
23 room with us, that gets all the patient information,
24 goes in, talks to the patient. Or if the patient has
25 a name tag, date of birth, you know.

1 REPORTER'S CERTIFICATE

2 STATE OF COLORADO)
) ss.
3 COUNTY OF LARIMER)

4 I, LISA B. KELLY, Registered Realtime
Reporter, Registered Professional Reporter and Notary
5 Public ID 19934018358, State of Colorado, do hereby
certify that previous to the commencement of the
6 examination, the said ERIN CARNAHAN was duly sworn by
me to testify to the truth in relation to the matters
7 in controversy between the parties hereto; that the
said deposition was taken in machine shorthand by me
8 at the time and place aforesaid and was thereafter
reduced to typewritten form; that the foregoing is a
9 true transcript of the questions asked, testimony
given, and proceedings had.

10 I further certify that I am not employed
11 by, related to, nor of counsel for any of the parties
herein, nor otherwise interested in the outcome of
12 this litigation.

13 IN WITNESS WHEREOF, I have affixed my
signature this 14th day of June, 2019.

14 My commission expires September 4, 2019.

15
16
17 _____
Lisa B. Kelly

18
19
20 _____ Reading and Signing was requested.

21 X Reading and Signing was waived.

22 _____ Reading and Signing was not required.

23
24
25