



ALEXIAN
BROTHERS
Neurosciences Institute

April 4, 2016

Ms. Kelly Baudin

Re: Paul Dulberg

Dear Ms. Bauden:

Per your request, this is a narrative report to supplement the deposition on Mr. Dulberg that was completed July 23, 2014. I will address each of your questions per the letter to my office dated February 16, 2016.

1. As a result of the accident Mr. Dulberg sustained on June 28, 2011, he has lost all fine and gross motor skills in his right hand. Indeed, it is still my opinion that due to the severing of muscles and nerves in this limb, he continues to be left with pain and involuntary muscle spasms.
2. Yes, the treatment that I provided Mr. Dulberg to the present date is the direct result of the accident and injuries sustained on June 28, 2011.
3. I have not changed my opinion from the original deposition in 2014 that Mr. Dulberg will continue to need medications to treat his neuropathic pain indefinitely. He will also continue to need periodic physical therapy sessions and we may also revisit both Botox injections in the future. Essentially, there has been no change in his examination due to the trauma in his right hand. There has been some improvement in his pain syndrome with gabapentin; however, his pain is by no means resolved with this agent.

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4. I could only estimate the cost of future treatments and procedures as the following: 1) I would like to see him at least three times a year which may result in a charge of at least \$200.00 per visit as a physician's fee. His medication (gabapentin) will cost him at least \$100.00 per month indefinitely. I also estimate that he will require physical therapy at least twice per year which may incur a cost of \$3,000.00 per course. However, these are complete estimates and I am not involved in the billing of his medical care. 2) Since Mr. Dulberg's injury is indeed permanent with almost a complete loss of gross and fine motor control of his right hand, his injuries will not allow any employment for the rest of his life.
5. Your inquiry concerning increased risks or long-term affects of his condition is unclear. I do not believe that he is at increased risk for cancer, stroke or heart attack; however, the psychologic and social impact of his inability to work certainly will permanently effect the quality for the rest of his life.
6. Concerning my prognosis with respect to his injuries, it is very poor. His motor function in the right hand will not improve and he will be left with permanent pain in his right lower arm.

Unfortunately, Mr. Dulberg is permanently disabled from any meaningful employment due to this tragic accident on June 28, 2011.

Sincerely,



Kathy A. Kujawa, M.D., Ph.D.

KAK:hss/jek