As a part of the PIAA Expert Witness Database business process, a series of emails will be sent to defense counsel to collect information regarding names of experts to be deposed and dates of expert depositions. For instance, if a plaintiff expert deposition is scheduled for February 15, 2012, an email will be sent to defense counsel on February 16, 2012 to confirm that the deposition went forward.

A sample of the email is posted below.

_________________________________________________________________

Date: February 16, 2012
To: Tom Smith, Esq.
Smith, Jones & Smith
Re: Expert Deposition of Dr. Daniel Johnson
Jane Doe v Community Hospital etal.

Dear Counsel:

We are following up to determine if the deposition of Dr. Daniel Johnson will be included in the PIAA Expert Witness Database. On behalf of ABC Insurance Company and the PIAA, please advise as follows:

1. Please advise if Dr. Daniel Johnson’s deposition went forward as scheduled on February 15, 2012.
   YES ____    NO ____

2. Was the deposition testimony under a Qualified Protective Order?
   YES ____    NO ____

3. Did the testimony include examination of a) alcohol and drug information, b) genetic information, c) acquired immune deficiency syndrome information, d) psychiatric records?
   YES ____    NO ____

4. Is there state law that would prohibit the inclusion of the testimony in the PIAA Expert Witness Database?
   YES ____    NO ____
Please be advised that if you answer in the affirmative to questions #2, #3, #4 above, we will:

1. Not collect depositions or transcripts where defense counsel advises that the PHI and subsequent testimony is under a Qualified Protective Order.
2. Not collect depositions that contain a) alcohol and drug rehabilitation information, b) genetic information, c) acquired immune deficiency syndrome, d) psychiatric records.
3. Not collect depositions where defense counsel indicates state law would prohibit inclusion of the testimony in the database.

If you answered No to questions #2, #3, #4, please complete the attached court reporter authorization and we will obtain a copy of the deposition transcript or video for the PIAA Expert Witness Database and we will advise you when the deposition transcript or video has been posted.

Thank you,

Second Chair Administration Team