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6	SUPERIOR COURT (OF THE STATE OF CALI	FORNIA
7	IN AND FOR T	THE COUNTY OF ORANG	GE
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13	Coordination Proceeding	JUDICIAL COUNCIL C	OORDINATION
14	Special Title (CRC 3.550(b))	NO: JCCP 4917 Hon. Glenda Sanders, Jud	dae
15	Children's Dental Group Cases	Tion. Glenda Banders, Jul	ige
16		SUPPLEMENTAL FIL	ING IN FURTHER
17		SUPPORT OF PLAINT FOR LEAVE TO FILE	
18		COMPLAINT TO CLA	IM PUNITIVE
19		DAMAGES AGAINST DEFENDANTS PURSU	
20		CIVIL PROCEDURE S	SECTION 425.13
21		Master Complaint Filed: 1st Bellwether Trial Date	February 8, 2018 : January 13, 2020
22		Hearing Date:	August 23, 2019
23		Hearing Time: Dept.:	1:30 p.m. CX101
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Come now Plaintiffs, by and through their Liaison Counsel, and hereby supplement their motion to amend their complaint to add claims for punitive damages pursuant to CCP 425.13 as to the CDG Defendants with the herein evidence and information.

INTRODUCTION

This supplemental filing is made necessary so that Plaintiffs can present additional information acquired since their motion was originally filed on June 26, 2019, which evidence was not available to Plaintiffs at the time of the original filing. Although the motion as filed was, in the estimation of Plaintiffs, more than sufficient for Plaintiffs to carry their burden in seeking punitive damages against the CDG defendants, additional information Plaintiffs have since uncovered provides additional support for the fact that the CDG Defendants acted with malice, fraud and oppression.

The information contained in this supplementation was obtained or discovered by Plaintiffs subsequent to their filing their original motion because the CDG has continued to produce documents in response to discovery requests propounded by Plaintiffs almost a year ago. The reasons for the delay have been aired in other forums in this litigation, including in concerns raised by Plaintiffs and the Water Defendants. Plaintiffs do not intend to relitigate those issues here, other than to represent to the Court that recent productions of texts, emails and internal memos and other communications from within CDG have shed additional light on relevant matters. The timing of such productions, in addition to the manner in which the productions were made, sometimes with claw-backs that caused additional delays in processing the information, also bear on the justification for this supplemental filing.

WHAT DID CDG KNOW, AND WHEN DID THEY KNOW IT?

One of the important questions in Plaintiffs' motion to amend their complaint to add claims for punitive damages pursuant to CCP 425.13 as to the CDG Defendants is whether CDG knew or should have known earlier than has heretofore been supposed that children receiving baby root canals and stainless steel crowns performed at CDG were returning to the clinic to have the teeth receiving the baby root canals and stainless steel crowns extracted due to painful and unusual infections. If CDG had such knowledge and information earlier than reported, but elected to ignore it, such a fact supports the conclusion that CDG acted with malice, manifesting itself as reckless disregard for the safety of the children. Alternatively, if

CDG concealed such information from parents and the public, it is evidence of fraud.

As shown in the motion to amend with punitive damages as to the Dentist Defendants, Elma Irving brings a spate of unusual dental infections to the attention of Dr. Minsky as early as July 1, 2016. [DDS Punitive Damages Motion at 15:24-28.] According to her own testimony, Dr. Nguyen becomes aware of the problem at this time and describes internal discussions among the various CDG dentists and administrators who are aware of the issue. [*Id.* at 16:1-6.] The Irving emails refer to three cases dating back to early June 2016 as representative of the "handful" of similar infections that various CDG dentists find themselves at pains to explain. [*Id.* at 15:24-28, and Ex. Y thereto.]

An examination of records obtained from CDG demonstrates that, over the years, baby root canals and stainless-steel crowns occasionally lead to the need for CDG to remove the impacted teeth. Even though the records reflect a steady stream of such failed crowned baby root canals, the incidences of such cases on a month-to-month basis, usually one or two per month, are a sort of background noise from a statistical standpoint. In early 2016, however, these cases spike dramatically, and the records reflect that personnel, including the CDG dentists individually sued in this case, are personally involved and therefore knowledgeable about those facts.

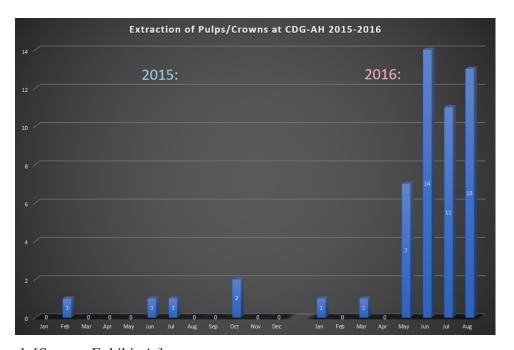


Figure 1. [Source: Exhibit A.]

In particular, in June 2016, after over a year during which the total cases of extractions of teeth with CDG crowns and baby root canals never exceeds two in a month in eleven out of twelve months, and total

zero in ten months of 2015 and 2016, the number quickly shoots up to fourteen. [See Declaration of Carlos X. Colorado ("Colorado Decl.") at ¶2 and Ex. A.] There are another eleven cases in July. [Id.] In August 2016, the figure is thirteen. [Id.] These cases arise in the wake of spore test failures evidencing bacterial contamination at CDG on March 16, June 7 and June 14, 2016. [DDS Punitive Damages Motion at 15:15-18, and Ex. X thereto.] The dental records associated with these cases reveal a disturbing detail: whereas earlier extractions of failed crowned baby root canals are performed years after the original crowning, the new extractions are occurring within a few months after the baby root canals/crowns are performed. [Ex. A (see L. Gallardo, 36 days; M. Mercado, 36 days; N. Amador, 35 days).] The dentists performing the extractions of recent crowned baby root canals in June 2016 are familiar names: Dr. Diaz performs 6 such extractions on 5 different patients in June 2016, Dr. Nguyen performs 4 such extractions on one child during two separate visits, and Dr. Abraham performs one extraction. [See Colorado Decl. at ¶3.] On June 27, while Dr. Diaz is extracting a failed crowned baby root canal by Dr. Abraham on bellwether plaintiff Quintero, Dr. Abraham herself is recommending new crown and baby root canal treatment on bellwether plaintiff Avila. [Id.]

These records make clear that CDG knew or should have known about the grave consequences associated with baby root canals that it was performing on children in June 2016. In fact, CDG admitted at a September 16, 2016 conference with health authorities detailed in documents recently provided by the Water Defendants that "kids have been getting sick since late April, early May 2016." [Ex. B (CRH000117).] Since then, CDG had exclusive knowledge about these matters because of the trust and reliance of its clients, who entrusted CDG with their follow-up care after developing these infections. At no time before it was ordered by the Orange County Health Care Agency to do so did CDG voluntarily stop performing baby root canals, address the water contamination failures or inform the parents or the public about these grave developments. ¹

¹ Business & Professions Code §1680 makes it "unprofessional conduct" not to report to the dental board "the removal to a hospital or emergency center for medical treatment of ... any patient as a result of dental or dental hygiene treatment." *See* B&P §1680(z)(1). Similarly, California Code of Regulations § 2500 mandates that, in the event of an "outbreak," "It shall be the duty of every health care provider, knowing of or in attendance on a case or suspected case of any of the diseases or conditions ... to report to the local health officer for the jurisdiction where the patient resides." *See* 17 CCR § 2500(a)(22) and (b). "Unusual diseases" or "outbreaks" of any disease must be reported within 24 hours. *See* 17 CCR § 2500(h) and (j).

CDG FIXATES ON PROFITS, IGNORES INFECTIONS

At the same time as this public health emergency is festering at CDG, its senior management is focused on other priorities.

From the outset, Mr. Gruenbaum establishes dentist production as a high priority item. For example, on January 18, 2015, he complains that the adult DDS production numbers are low. [See Colorado Decl., Ex. C (CDGMIX000174).] Five days before the ouster of John Fehmer, on March 5, 2015, an email is circulated to the administrative team lamenting that "Total pedo production of \$1.6 million was -8.2% behind last year, with double-digit declines vs. LY in" three offices. [See Colorado Decl., Ex. D (GJ00000537).] The email carps that "For the year, total pedo production of \$3.3 million is down -6% from last year[.]" [Id.]

This grousing is not tantamount to idle threats: in early 2016, CDG's corporate managers recommend terminating Dr. Alex Sheng in part over concerns relating to her allegedly low production. Carson Manager Cristina Perez points to a treatment room video (by time stamp—confirming that the videos, *all of them since erased by CDG*, were used to track production) to report that Dr. Sheng is not trying hard enough to complete work on uncooperative patients, and compares her unfavorably to Dr. Olex, who "is jumping from chair to chair" performing procedures.² [See Colorado Decl., Ex. E (DJMINS002135).] Jonathan Elosseini, the Operations Director at CDG, responds: "I have made adjustments to the doctor schedule for Carson and am ok to proceed with terminating Dr. Sheng on my end." [Id.]

On June 24, 2016—after the extractions of infected baby root canals on five different children has taken place—Mr. Elosseini sends Dr. Minsky an email regarding Drs. Kong and Nasiri. "As you can see," he writes with respect to the production figures embedded in the email, "I have some concerns regarding the consistently low productivity from both doctors." [See Colorado Decl., Ex. F (CDGMIX006231.0001).] According to the figures, Dr. Kong's YTD production is 71.90% of the company average; Dr. Nasiri's is 78.39%. [Id.] He goes on: "Sam recommended that you perhaps spend some time observing these doctors in the offices and make an assessment as to whether or not they are the right fit for CDG." [Id.]

² Mr. Elosseini praised Dr. Olex's "Very strong production," and said in praise: "Dr. Olex is a beast." [CDG Punitive Damages Motion at 10:6-9, and Ex. J thereto.]

Dr. Minsky's billing records reflect that, over the next month, he spends fifteen hours mentoring Dr. Kong in three separate meetings (eight hours on July 8, 2016; two hours on July 22, 2016; and five hours on July 29, 2016), and three hours mentoring Dr. Nassiri. [See Colorado Decl., Ex. G (DJMINS000436.0001-0002).]

By contrast, Dr. Minsky's response to the mycobacterial infections is more reserved. When Elma Irving informs him about the infections that have been occurring, he does not accept the information at face value. [See Colorado Decl., Ex. H (Minsky Depo. Tr.) at 99:7-10 ("Q. Would it be accurate to say that you became aware of infections that were somewhat unusual occurring as of July 1st, 2016, at Anaheim CDG? A. No.").] Instead, Dr. Minsky interprets Irving's email to show only "that there was a concern expressed by Elma. I cannot say whether they were infections or cellulitis." [Id. at 99:14-17.]

'LACK OF CLEANLINESS ALWAYS A CONCERN'

Another issue raised in Plaintiffs' motion to amend their complaint to add claims for punitive damages is whether CDG turned a blind eye to patient safety considerations.

An early indication in this connection arises in October 2015, when Maria Gonzalez, an administrator at CDG, writes to Dr. Minsky and Mr. Elosseini that "lack of cleanliness has always been a concern" at CDG's Anaheim office. In preparation for an HMO audit of CDG, Dr. Minsky sends around a cheat sheet of "items that need correction" so the audit is successful. [See Colorado Decl., Ex. I (DJMINS002022.0001-0002).] Among the infractions noted: "Doctors cannot keep extra masks or gloves in their pockets. Dr. Diaz was observed with masks in his pocket." [Id. (emphasis added).] The email notes other issues relating to hygiene, which prompts Ms. Gonzalez to note: "Just so you have background feedback lack of cleanliness has always been a concern in AH [Anaheim]." [Id. (emphasis added).]

In addition to the previously referenced spore test failures [see DDS Punitive Damages Motion at 15:15-18], newly produced documents reflect that Dr. Minsky is also presented additional information indicating ongoing hygiene lapses at the Anaheim clinic involving Dr. Diaz. On July 11, 2016, Elma Irving sends Dr. Minsky another email, this time with respect to the hygienic practices of Dr. Diaz. Irving relays that "Dr. Diaz has told a few assistants including myself to have a '5 second rule' when instruments or anything falls on the floor." [See Colorado Decl., Ex. J (DJMINS002248) (emphasis added).] Irving relates a litany of hygiene violations by the dentist: "He uses contaminated instrument to get pulp material out of

Containers. He answers his phone with dirty gloves when working with patient ... [W]hen we hand him the curing light he does not like us putting the orange shield on ... He used an irrigation syringe on a patient then he saw blood splatter on his scrubs so he used that same syringe to put hydrogen peroxide on the stain." [Id.] Once again, Dr. Minsky does not accept the information at face value (like the low productivity of Drs. Kong and Nasiri): "If this is accurate and a doctor is not following infection control procedure," he responds, "it needs to be addressed." [Id. (emphasis added).]

In the wake of the infection outbreak, CDG practices immediately become the focus. Documents recently produced by the Water Defendants show that, at a September 15, 2016 meeting with public health authorities, "There were a few concerns regarding SOPs of the handling of water and the refillable plastic containers that were used in the treatment rooms. The way the employees handled the tubing and the non-sterilization of the bottles." [See Colorado Decl., Ex. K (CRH000001).] A January 26, 2017 presentation by the Orange County Health Care Agency enshrines the same concerns: "Water bottles not changed or washed; left in place overnight ... No chemical or ion treatment of the water system; no HPC tests done." [See Colorado Decl., Ex. L (Deposition Exhibit 202) at p. 26.] Dr. Matthew Zahn, of the Orange County Health Care Agency, believes that bacterial debris from contaminated bottles could get into the water lines: "There is the potential for biofilm forming at any point along the lines of that -- of those systems." [See Colorado Decl., Ex. M (Zahn Depo. Tr.) at 131:19-25.] Biofilm "can attach onto the side of any foreign body...a tube where water is going through it or a bottle where water is sitting in it." [Id. at 132:5-7.] In fact, Dr. Zahn testified that untreated water left in a bottle overnight "could be a source" of contamination, and its bacterial counts could potentially increase. [Id. at 148:19-149:15 and 150:12-16.]

LACK OF CONSENT

The October 2015 email that Dr. Minsky prepares in anticipation of the HMO audit admits that CDG has a problem relating to "Consent forms." In his email, Dr. Minsky points out that "Doctors must sign and date consent form before treatment is started and before sedation is given ... The patient's parent or consent signer must sign and date all consent forms before sedation is given and before treatment starts." [See Ex. I.]

A review of the records reveals pervasive failure by CDG to obtain consent from the patients for treatment done by CDG's dentists. [See Colorado Decl. at ¶16.] In particular, it is evident from the records

that CDG consistently "reuses" treatment consent forms rather than obtaining consent from the patients' parents on subsequent visits when treatment is provided. [*Id.*] Instead, CDG inserts an image of the parent's signature from an earlier visit into the consent form for a subsequent visit to reflect consent for the treatment provided in the later visit. [*Id.*]

For example, on February 13, 2016, Nathan Castillo visits CDG and undergoes treatment, including 3 fillings, 2 steel crowns, and 2 baby root canals by Dr. Trinh Pham. [*Id.*] These are the signatures from the consent form for the treatment on that day:



For some reason, Dr. Pham does not sign the form. Several months later, on May 9, 2016, Nathan returns to CDG and undergoes additional treatment, including a filling, 4 new steel crowns and 4 baby root canals, this time by Dr. Diaz. [*Id.*] The same signature block appears on the consent form for the treatment that day, though, this time, Dr. Diaz appears to sign the doctor portion of the signature block:



Plaintiffs have found 252 instances of such "reuse" of consent signatures to justify treatment, including for bellwether plaintiffs Jennifer Jimenez, Jason Cardoso and Valeria Quintero. [Id.] Dr. Diaz faced a Dental Board investigation regarding the proper documentation of consent. [Id.] This evinces a pattern and practice by CDG and reflects further evidence of malice and fraud toward Plaintiffs.

OTHER ANOMALIES IN THE DOCUMENTATION

When the mycobacterium infection outbreak makes news in September 2016, many parents report difficulty obtaining their files, the concerns are reported in the press, and the Plaintiffs in this litigation are

familiar with the frustration. On September 21, 2016, a reporter for K-PCC writes Mr. Gruenbaum that "Last week, we ran a story about your clinic, and it included a quote from the father of the 4-year-old girl who was hospitalized with a mycobacterial infection. It says he tried to get his daughter's medical records, but the clinic refused to hand them over." [See Colorado Decl., Ex. O (DSGRUB000404.0001-0002).] Gruenbaum responds that the process of clearing the records "usually takes about a day to complete." [Id.]

Other documents shed light on the delay, which is an issue even before the incident makes it to the headlines. Earlier, in July, CDG has faced the same issue. "Patients mother is requesting a copy of her records," a staffer writes to Dr. Minsky. [See Colorado Decl., Ex. P (Deposition Exhibit 178).] "My understanding is that she is at the office now," the staffer writes before she points out the crux of the problem. [Id.] "I am wondering if you can review the chart notes to ensure what we give her a copy of is legit," writes the staffer. [Id.] She instructs another staffer: "Can you please review the account (financial perspective) and ensure everything was entered and billed accordingly?" [Id.] (all emphasis added).

As Plaintiffs point out in the motion, the patient records are rife with what Dr. Nguyen characterizes as "inconsistent" descriptions [see CDG Punitive Damages Motion at 13:20] and Plaintiffs contend is evidence that CDG engaged in fraudulently misrepresenting the behavior of patients to Denti-Cal in order to justify submitting claims to the state for the use of nitrous oxide during treatment [id. at pp. 13-14].

The internal communications reflecting concerns with ensuring the files handed over to patients are "legit" from a "financial perspective," and that "everything ... was billed accordingly" is consistent with the problematic state of the records found by Plaintiffs. Additionally, the fact that months later, CDG still needs to go through a daylong clearance process for document requests in the middle of a medical emergency is also consistent with the existence of major anomalies in the patient records.

The false statements in the billing submissions, of course, is prima facie evidence of fraud.

CONCLUSION

Accordingly, Plaintiffs respectfully renew the requests for relief restated in their motion.

Dated: July 30, 2019 HODES MILMAN, LLP

By: /s/ Carlos X. Colorado
Carlos X. Colorado, Esq.
Plaintiffs' Liaison Counsel

DECLARATION OF CARLOS X. COLORADO

I, Carlos X. Colorado, hereby declare as follows:

- 1. I am Liaison Counsel for Plaintiffs in this Coordination Proceeding. I am over the age of eighteen years old and I have personal knowledge of all the matters asserted herein, except as to those matters stated upon information and belief. If called as a witness, I could and would competently testify thereto.
- 2. In preparation for this case, I have caused the charts of all of our clients to be analyzed for information relating to the time between baby root canals/crowns and the need to extract the impacted teeth by CDG. The data shows that in June 2016, after over a year during which the total cases of extractions of teeth with CDG crowns and baby root canals never exceeded two in a month in eleven out of twelve months, and total zero in ten months of 2015 and 2016, the number quickly shot up to fourteen on that month. There WERE another eleven cases in July. In August 2016, the figure was thirteen. True and correct copies of the charts for the cases in which baby root canals/crowns performed by CDG were extracted by CDG in 2015 and 2016 are attached hereto as **Exhibit A**.
- 3. The records in Exhibit A show that the dentists who performed the extractions of recent crowned baby root canals in June 2016 were as follows: Dr. Diaz performed 6 such extractions on 5 different patients in June 2016, Dr. Nguyen performed 4 such extractions on one child during two separate visits, and Dr. Abraham performed one extraction. In fact, on June 27, 2016, while Dr. Diaz was extracting a failed crowned baby root canal by Dr. Abraham on bellwether plaintiff Quintero, Dr. Abraham herself was recommending new crown and baby root canal treatment on bellwether plaintiff Avila.
- 4. Attached hereto as **Exhibit B** is a true and correct copy of a memorandum dated September 16, 2016, produced by the Water Defendants in response to discovery requests propounded by the CDG Defendants, bearing the bates designation CRH000117.
- 5. Attached hereto as **Exhibit C** is a true and correct copy of an email dated January 18, 2015 from Sam Gruenbaum, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation CDGMIX000174.

- 6. Attached hereto as **Exhibit D** is a true and correct copy of an email dated March 5, 2015 from Wayne Johnson, produced by Gregory Jacks in response to discovery requests propounded by the Plaintiffs, bearing the bates designation GJ00000537.
- 7. Attached hereto as **Exhibit E** is a true and correct copy of an email dated March 10, 2016 from Maria Gonzalez, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation DJMINS002135.
- 8. Attached hereto as **Exhibit F** is a true and correct copy of an email dated June 24, 2016 from Jonathan Elosseini, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation CDGMIX006231.0001.
- 9. Attached hereto as **Exhibit G** is a true and correct copy of an invoice dated July 31, 2016 from Dr. Minsky, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation DJMINS000436.0001-0002.
- 10. The deposition of Dr. Minsky was taken in this matter on March 27, 2019 and I personally attended the proceedings. A copy of true and correct excerpts of the transcript of the Minsky deposition are attached hereto as **Exhibit H**.
- 11. Attached hereto as **Exhibit I** is a true and correct copy of an email dated October 26, 2015 from Jonathan Elosseini and accompanying email thread, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation DJMINS002022.0001-0002.
- 12. Attached hereto as **Exhibit J** is a true and correct copy of an email dated July 13, 2016 from Dr. Minsky and accompanying email thread, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation DJMINS002248.
- 13. Attached hereto as **Exhibit K** is a true and correct copy of a memorandum dated September 15, 2016, produced by the Water Defendants in response to discovery requests propounded by the CDG Defendants, bearing the bates designation CRH000001.
- 14. Attached hereto as **Exhibit L** is a true and correct copy of a Power Point presentation dated January 26, 2017 and marked as Deposition Exhibit 202 during the deposition of Dr. Matthew Zahn taken in this matter.

- 15. The deposition of Dr. Matthew M. Zahn was taken in this matter on July 10, 2019 and I personally attended the proceedings. A copy of true and correct excerpts of the transcript of the Zahn deposition are attached hereto as **Exhibit M**.
- 16. In addition to the analysis described in paragraph 2, above, I have caused a review of the charts to be undertaken reveals pervasive failure by CDG to obtain consent from the patients for treatment done by CDG's dentists. In particular, it is evident from the records that CDG consistently "reuses" treatment consent forms rather than obtaining consent from the patients' parents on subsequent visits when treatment is provided. Instead, CDG inserts an image of the parent's signature from an earlier visit into the consent form for a subsequent visit to reflect consent for the treatment provided in the later visit. True and correct copies of the Nathan Castillo records excerpted in the Supplemental Brief are attached hereto as **Exhibit** N. Plaintiffs have found 252 instances of such "reuse" of consent signatures to justify treatment, including for bellwether plaintiffs Jennifer Jimenez, Jason Cardoso and Valeria Quintero.

To date, Plaintiffs have identified reuse in the following files: Abraham Lara, Adaya Feldblumb, Aiden Vaca, Alejandrina Avila, Alice Torres, Alliah Huerta, Allize Hernandez-Paxtor, Alondra Meza, Americus Thornton, Anderson Vasquez, Andrea Ralios, Andres Ramirez, Andrew Delatorre, Anthony Sierra, Arianna Ramirez, Ashley Alvarado, Ashley Rojas, Azucena Meza, Azucena Meza, Bahteli Feldblumb, Brandon Morales, Brianna Cruz, Brianna Hernandez, Bryan Cortes, Camila Duarte, Cassius Parker, Chris Garcia, Christopher Harding, Christopher Marquez, Coraline Chavez, Dafne Cano, Damian Diaz, Damian Murillo, Damian Pina, Damian Puentes, Darlin Arredondo, Dayron Vazquez, Diego Cruz, Eddie Soto, Edward Calderon, Edwin Macedo, Eliana Lomeli, Elizabeth Franco, Elvin Vargas, Emily Flores, Emily Ramirez, Farhan Ahmadi, Fatima Ferreyra, Fernanda Rocha, Gabriella Kordab, Genesis Moya, Genesis Vasquez, Gibran Greer, Giselle Jimenez, Guadalupe Ferreyra, Gustavo Garcia, Holly Ramirez, Ian Castillo, Ian Ramos, Isaac Nevarez, Isabel Rodriguez, Izzac Bernal, Jaden Duran, Jaiden Correa, Janell Gomez, Jason Cardoso-Martinez, Javier Carrion, Jaxx Harth, Jennifer Jimenez, Jeremy Rantanen, Jerry Canal, Jessica Schubert, Jesus Torres, Joanna Jin, Jocelyn Ruiz, John Thorton, John Velasco, Jonathan Feldblumb, Jose Perez, Joseph Avina, Joseph Schubert, Juan Rodriguez, Kevin Perez, Kiele Furfey, Kody Tietel, Krystal Santamaria, Kylah Garcia, Leah Escamilla, Leslie Hernandez, Lex

Gallardo, Lily Ransom, Lindsi Gomez, Lizbeth Bustamante, Logan Tietel, Luis Munoz, Luke Harth, Luna Ortega, Totozintle, Majid Odeh, Makaela Curtis-Tietel, Manny Garcia, Mariah Pena, Marielena Castaneda, Martin Rodriguez, Michael Galindo, Michelle Martinez, Miguel Mercado, Millie Jaramillo, Mimi Morales, Mondana Taherkhani, Monica Agripino, Moses Domingo, Nairi Amador-Moralez, Natalia Cruz, Nathalie Hernandez, Nathan Castillo, Nathaniel Hinojosa, Nicole Cazales, Nizhoni Taherkhani, Noe Castillo, Odin Parker, Randy Orduno, Ruben Rodriguez, Sadie Perez, Salvador Ceja, Steve Rico, Steven Hernandez, Tommie Harding, Uriel Mendoza, Vadhir Hernandez, Valeria Quintero, Victor Gomez, Vincent Ortiz, Ximena Velasquez, Yair Varela, Yairy Pineda, Yanira Ortiz, Yaretzy Ramirez, Yazan Salameh, Yesenia Tipaz-Perez, Yessica Hernandez and Zuleyma Castillo. Sometimes there are multiple instances within each file.

Dr. Diaz faced a Dental Board investigation regarding the proper documentation of consent.

- 17. Attached hereto as **Exhibit O** is a true and correct copy of an email dated September 21, 2016 from Rebecca Plevin and accompanying email thread, produced by Defendants in response to discovery requests propounded by the Plaintiffs, bearing the bates designation DSGRUB000404.0001-0002.
- 18. Attached hereto as **Exhibit P** is a true and correct copy of an email from Jonathan Elosseini and accompanying email thread dated July 11, 2016 and marked as Deposition Exhibit 178 in this matter.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed on July 30, 2019, at Long Beach, California.

Carlos X. Colorado, Esq.

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Signed Consent Forms Assistant:	Date: 100 1 10 III Cara (a) to	lepivacaine
Oral Hygiene Instructions	Parent Signature: Carp (s) Carp (s)	———— ————————————————————————————————
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Date / Tooth	Treatment, Procedures, Prescriptions, Etc.	Next Appointment
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LP 10:09 (blue)

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ALLERGIES:	:				MED	ICAL ALERT:
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LP 10:09 (blue)

ALLERGIES:		IEDICAL ALERT:
TREATMENT RE	ECORD -	
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TREATMENT RECORD [1217512 NATHAN CASTILLO]

ALLERGIES: MEI	DICAL ALERT:
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ALLERGIES:	MEDICAL ALERT:
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7	Aps inwith	THE	CDG - DR 7 0/107/96)

9.16.16

Conference call with Irma Bishop, Eric Pagsanhan, Sheryl Lydon, Linda Gerhard

Issue: Bacterial contamination

<u>Press Release issued by Fox News</u>: 7 children who have been hospitalized for a potentially deadly bacterial infection after visiting a dental clinic in Southern California, and 500 more may be at risk. Based on previous outbreaks of the infection, oral cellulitis, health officials say the source may be contaminated water, the OC Register reported.

- Santa Ana's customer
 - o Children's Dental Group, 2156 E. Lincoln, Anaheim, CA 92806
 - o Start of services 11.27.2013
 - o Account #1875418
- Services include:
 - o DI + RO equipment believed to be involved in dental instrument sterilization
 - Contaminated instruments appear to be source of bacteria
 - o Basic RO

Our Equipment:

Located Upstairs — RO in the employee breakroom. Under the sink, connected to the POU, no faucet. No contact with public. Going upstairs requires code key access.

Located Downstairs – DI/RO system – source of water used for the autoclave and direct rinsing with patients mouths. There is a hose/spout from the system. The employees pour that water into a separate container, WATER DOES NOT FEED DIRECTLY FROM OUR SYSTEM TO THE RECEIVER (patient; autoclave; etc).

- Water is carried from our system to the autoclave
- Water is carried/fed into a receptacle for use on patients for rinsing
- Note Eric and Dave Keeney, and Ken Ottenbacher were told by the people at the clinic that the
 water is transferred via plastic pitchers, 2 liter bottles and that mechanism is in question.

Water Testing - microbacterium abscessus (rare) is found to be the cause.

<u>Our Testing –</u> we tested the water for ecoli/coliform – test results found these to be absent in the sample – EXHIBITS A 1-3

OCHCA Testing - Their testing found that the water coming directly from our equipment in the sterilization area showed a numeric rating of 74. Per the OCHCA, anything 500+ is concerning, so the results on our equipment were extremely low. In contrast, samples taken from other areas of the clinic

having nothing to do with our equipment showed levels as from 660 - 16,000 -extremely high. EXHIBITS B 1-5

- o Orange County Health Department
 - Dr. Eric Handler, Health Officer believes this has to do with the water source used at the clinic.
 - "As to why, we're still investigating that".
- It was disclosed that kids have been getting sick since late April, early May 2016.
- Water testing done by the Orange County Health Department on 9.7.16 shows water from our equipment in the sterilization room to reflect a numeric result of 74, well below the 500 threshold.
- An email from Sam Guenbaum, CEO of Children's Dental Group was sent to Rudy Saldana on 9.8.16 at 2:53pm requesting our immediate attention and notifying us that the CDC is addressing the situation.
- Rudy forwarded the email to Dan Alexander on 9.8.16 at 3:02pm
- Dan Alexander forwarded the email to Ken Ottenbacher, Rob Pendergraft, and David Keeney with CC to Eric Pagsanhan on 9.8.16 at 3:45pm.
- 9.9.16 David Keeney went out to the site and took water samples from the DI/RO used in the sterilization process.

Outstanding:

- If we get a request from media for interview Who responds and what do we want them to say? What is our message?
 - a. Per CR 9.16.16- "No tests that have been performed by us or the OCHCA on our equipment or the water coming out from it showed any abnormalities. We continue to work with the clinic and the OCHCA to ensure the safety of the patients".
 - b. What about on-camera media requests?
 - c. Eric P to communicate to his employees to direct any communication to him.
- 2. Eric conveyed during 9.16.16 conference call that he gets the feeling the clinic is trying to pin this problem on us.
 - a. We are filing with Custard as a 'report only' so we may fulfill our reporting requirements with our carrier.
- 3. OCHCA is waiting on a written plan for replacement of the current water system. This involves the complete replacement of all Culligan equipment as a safeguard.
 - a. Equipment removed to be bagged and stored securely at our dealership
- 4. Water sample taken prior to removal of equipment for future reference sealed and secured.

From: Wayne Taylor < WTaylor@cdgdental.com>

Sent: 1/19/2015 1:19:00 PM -0800

To: Samuel Gruenbaum <samuel.gruenbaum@gmail.com>
CC: John Fehmer <jfehmer@cdgdental.com>; Chris Sakamoto

<csakamoto@cdgdental.com>

Subject: RE: Adult dental DDS production

Sam:

In the Adult Dept, Drs Siazon and Pasion are the treatment doctors, which is reflected in the higher \$ / Day average. Drs Guerrero and Wahby are strictly hygiene doctors. Dr Zar is also a hygiene doctor, with some limited treatment, but the majority of his schedule is HMO patients. Dr. Abraham works a limited schedule (one to 1.5 days per week) doing endodontic procedures for MediCal patients.

WT

From: Samuel Gruenbaum [mailto:samuel.gruenbaum@gmail.com]

Sent: Sunday, January 18, 2015 9:22 PM **To:** Chris Sakamoto; Wayne Taylor

Cc: John Fehmer

Subject: Adult dental DDS production

Wayne:

In looking at the figures on the attached schedule of adult DDS production, I noticed some numbers that seemed low. Any special reason for the numbers?

Sam G.

323-702-3539

FW: Feb Production Summary

Alma Herrera [aherrera@cdgdental.com]

Sent: Tuesday, April 14, 2015 2:49 PM
To: Greg Jacks [gregoryhjacks@gmail.com]
Attachments: Feb15-ProductionSummary.xlsx (24 KB)

FYI

From: Wayne Taylor

Sent: Thursday, March 05, 2015 11:57 AM **To:** Office Managers; Administrative Team

Cc: John Fehmer; Chris Sakamoto; Dr. Corina Ramirez; Dr. Brindha Subramanian; Dr. Irina Tarnavsky; Dr. Jay

Lutsky

Subject: Feb Production Summary

Office Managers: Total pedo production of \$1.6 million was -8.2% behind last year, with double-digit declines vs. LY in NW, SA and SJ. Visits were up 2.6%, and New patients were up 1.9%, breaking a five month trend of declines. For the year, total pedo production of \$3.3 million is down -6% from last year, with total patient visits up 4.3%. Only AH, SV and WH are ahead of LY on a YTD basis.

The Adult Dept saw 7% growth in production in Feb, in spite of a -4% decline in visits. For the year, the Adult Dept is up 7.9%, with a -2% decline in visits.

WT

From: Maria Gonzalez <mgonzalez@cdgdental.com>

Sent: 3/10/2016 8:57:02 AM -0800

To: Jonathan Elosseini < JElosseini@cdgdental.com>; Dr. Jerry Minsky

<JMinsky@cdgdental.com>

Subject: RE: Dr.Sheng

Good morning,

Jonathan, did you get my message about the video?

She worked with this patient for a total of like 2 minutes, the child did move and kick her legs to help herself up, she did manage to inject a little. Joyce did try and calm the kid but Dr. Sheng apparently say something that ended up in terminating the work. In my opinion, kid was not on the N202 long enough to get her sedated. I think Joyce probably asked Dr. Sheng to allow the gas to do its job but Dr. Sheng chose not to. I agree with Cristina that she is likely rescheduling patients without really trying but if I were making a decision on this case alone I would say other Docs would have done the same.

Jack Yeung, Peter Chen, Pamela Abraham, these Docs come to mind. I have not been able to get this kids account number to pull up her records.

Having said all of that, this has become a trend, according to Cristina, and she needs to help us understand what is going on. When I say us, I think perhaps Dr. Minsky or you.

Thanks

MG

From: Jonathan Elosseini

Sent: Thursday, March 10, 2016 12:48 AM

To: Dr. Jerry Minsky **Cc:** Maria Gonzalez **Subject:** FW: Dr.Sheng

Dr. Minsky,

I have made adjustments to the doctor schedule for Carson and am ok to proceed with terminating Dr. Sheng on my end. Please advise how you would like to proceed.

Thank you,

Jonathan Elosseini

Operations Director

Children's Dental Group

Mobile: (310) 490-1278

Email: jelosseini@cdgdental.com

Begin forwarded message:

From: "Cristina C. Perez" < CPerez@cdgdental.com Date: March 5, 2016 at 4:51:51 PM PST

To: Jonathan Elosseini < <u>JElosseini@cdgdental.com</u>>

Subject: Dr.Sheng

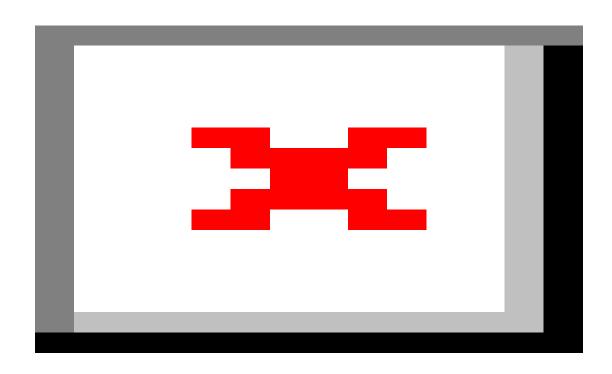
I know you have a lot in your plate – but I want to discuss Saturday doctor schedule.

Total production for Dr. Sheng today was \$2,061.00 – not only do we have challenges not giving her any Delta Dental patients, but she also re-schedules everything for OCS or IV. If you have a minute, can you please view camera recording for TX Room 2, time frame from 12:23pm to 12:25pm. This little girl was pulled for treatment, and in 2 minutes, Dr.Sheng canceled the appointment and recommended OCS or IV sedation only. Her reasoning, the patient is too big and she was kicking and moving out of control. If you view the video, you will notice that there is not "patient management" from Dr.Sheng, she simply stops the anesthetic process and cancels the appointment. Dr.Sheng saw a total of 11 patients, while Dr.Olex saw over 30 patients, this is completely unacceptable.

Dr.Sheng sat around most of the day, while Dr.Olex is jumping from chair to chair. A lot of it has to do with Dr.Sheng not being credential with Delta, but a large reason is for thing such as this one.

Saturday's can be very productive for Carson and we're losing so much opportunities...... this is driving me crazy.

Cristina



From: Jonathan Elosseini < JElosseini@cdgdental.com>

Sent: 6/24/2016 4:34:46 PM -0700

To: Dr. Jerry Minsky <jerryminskydds@emailpros.net>
CC: Sam Gruenbaum <SGruenbaum@cdgdental.com>

Subject: Dr. Kong and Dr. Nasiri Concerns

Dr. Minsky,

Please see the table below for the average production per day for both Dr. Nasiri and Dr. Kong (Pedo) by month for 2016. As you can see, I have some concerns regarding the consistently low productivity from both doctors. Sam recommended that you perhaps spend some time observing these doctors in the offices and make an assessment as to whether or not they are the right fit for CDG. Let me know your thoughts.

FYI - company average for doctors in our Pedo practice is \$3683 Year-To-Date.

	Jan	Feb	Mar	Apr	May	Jun (MTD)	YTD
Dr. Kong	\$2,201	\$2,418	\$2,232	\$2,967	\$3,021	\$3,047	\$2,648
Dr. Nasiri	\$1,937	\$2,720	\$3,485	\$3,268	\$3,106	\$2,805	\$2,887

Hire dates:

Dr. Kong - 11/14/15

Dr. Nasiri - 12/10/15

Thank you,

Jonathan Elosseini

Operations Director

Children's Dental Group

Mobile: <u>(310)</u> 490-1278

Email: jelosseini@cdgdental.com

REMIT TO: Jerry Minsky, DDS, Tax ID 33-0111-411 6720 E. Swarthmore Dr.

Anaheim, Ca 92807

Phone: 562-860-8330, Fax: 714-363-5441

Invoice

DATE	INVOICE #
7/31/2016	130

BILL TO
Sierra Pacific Consulting

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Professional Services	07-01-2016 TC w/Maria on inf control Ana		125.00	93.75
Professional Services	07-05-2016 TC w/ Elma and TC w/ Maria re inf control		125.00	156.25
Professional Services	07-08-2016. Mentor Dr. Kong in Carson 09:30-6pm. 30 min lunch		125.00	1,000.00
Professional Services	07-11-2016 Arrange OS for Anaheim pt.		125.00	437.50
Professional Services	07-12-2016 Mentor Dr. Nisiri in Anaheim,		125.00	375.00
Professional Services	07-13-2016. TC with Ryan, JDR Tech Service, sterilizer testing and repair re ANA, TC with Maria about JDR Co, waterline testing, TC with Greg Jacks on face to face int.	2	125.00	250.00
Professional Services	07-15-2016 Face to face interview corporate Dr. Laurel	2	125.00	250.00
Professional Services	07-15-2016, Face to face interview Dr. Adonis	1.25	125.00	156.25
Professional Services	07-15-2016 TC Sam Bd inquiry, backup suction, review Qtr Chart template	0.5	125.00	62.50
Professional Services			125.00	62.50
Professional Services 07-20-2016 TC w/ Jonathan on new RX laws per Triad Pharm (our compounding phamacy).		0.5	125.00	62.50

REMIT TO: Jerry Minsky, DDS, Tax ID 33-0111-411 6720 E. Swarthmore Dr.

Anaheim, Ca 92807

Phone: 562-860-8330, Fax: 714-363-5441

Invoice

DATE	INVOICE #
7/31/2016	130

BILL TO	
Sierra Pacific Consulting	

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Professional Services	07-21-2016 Phone interview w/ Dr. Moussodian, Greg Jacks, and Shanaz Vyed	1	125.00	125.00
Professional Services	07-20-2016 TC w/ Ron, Pharmacist re new coumpound laws		125.00	62.50
Professional Services	07-21-2016, review and sign retainer and representation letter from Kalt, atty re purchase documents	0.5	125.00	62.50
Professional Services	07-22-2016, mentor Dr. Kong in Carson	2	125.00	250.00
Professional Services	07-22-2016, Mtg w/Sam and Dr. Diaz in AH	1	125.00	125.00
Professional Services	07-22-2016 Review records on DBC inquiry, AH	4.5	125.00	562.50
Professional Services	07-24-2016, review Dr. Olex notes	3	125.00	375.00
Professional Services	07-26-2016 Draft DBC response, Dr. Olex, ANA	1.25	125.00	156.25
Professional Services	07-29-2016, Mentor Dr. Kong in Carson	5	125.00	625.00
				-1,000.00

Page 2	Total	4,2	250.00
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1	SUPERIOR COURT OF THE STATE OF CALIFORNIA
2	COUNTY OF ORANGE - COMPLEX JUSTICE CENTER
3	
4	
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6	
7	COORDINATION PROCEEDING SPECIAL) JUDICIAL COUNCIL
	TITLE (RULE 3.350)) COORDINATION
8) PROCEEDING NO. 4917
)
9	In Re: CHILDREN'S DENTAL GROUP)
)
10)
11	
12	
13	
14	
15	
16	VIDEOTAPED DEPOSITION OF JERRY MINSKY, DDS
17	Costa Mesa, California
18	March 27, 2019
19	VOLUME I
20	
21	
22	Reported by:
23	CAROLYN GREGOR, CSR 2351, CRR, RMR, RDR
24	JOB NO. 3206787
25	PAGES 1 - 223
	Page 1

1	A Yeah, I just said that. I'm sorry, I don't.	12:58:49
2	Q Okay. No, don't be sorry. If you don't, that's	12:58:52
3	part of the rules that we play by here. So I'll be more	
4	than happy to rephrase it or try and get the question out	
5	in a better form.	
6	A Thank you.	12:59:03
7	Q Would it be accurate to say that you became	12:59:04
8	aware of infections that were somewhat unusual occurring	
9	as of July 1st, 2016, at Anaheim CDG?	
10	A No.	12:59:18
11	Q Okay. When did you first become aware that	12:59:19
12	there was something going on with infections that were	
13	somewhat unusual from Anaheim CDG patients?	
14	A The only thing that I can reference is this	12:59:29
15	e-mail when I became aware that there was a concern	
16	expressed by Elma. I cannot say whether they were	
17	infections or cellulitis.	
18	Q Okay. Did you go back and review the charts	12:59:41
19	that are mentioned here, the three charts that are	
20	outlined in this e-mail?	
21	A I believe I did.	12:59:49
22	Q Okay. Well, at that point, you would know	12:59:51
23	whether there were infections or not, true?	
24	A If there was enough information from the doctor	12:59:56
25	for me to make a dental decision, then, yes.	
		Page 99

From: Jonathan Elosseini < JElosseini@cdgdental.com>

Sent: 10/26/2015 1:56:38 PM -0700

To: Dr. Jerry Minsky <jerryminskydds@emailpros.net>
CC: Maria Gonzalez <mgonzalez@cdgdental.com>

Subject: Re: High Importance, CDG Anaheim, Items that need correction before 11-4-

2015 HMO audit

Confirmed

Jonathan Elosseini Operations Director Children's Dental Group Mobile: (310) 490-1278

Email: jelosseini@cdgdental.com

On Oct 26, 2015, at 1:52 PM, Jerry Minsky, DDS - HIPAA Secure Email

<jerryminskydds@emailpros.net> wrote:

Jonathan, please confirm that Elma has received the email specific to the corrections needed in Anaheim.

Thank you.

Sent from my Windows Phone

From: <u>Jonathan Elosseini</u> Sent: 10/26/2015 12:09 PM

To: Maria Gonzalez; Dr. Jerry Minsky

Subject: RE: High Importance, CDG Anaheim, Items that need correction before 11-4-2015 HMO audit

Hi Maria, In my previous experience, either a Clinical Director or Compliance Director would sent out an email/memo to all Managing Dentists and Office Managers with the requested items and any instructions. There was also a OSHA Compliance Auditor that would visit each office at least one per quarter and go through a checklist. The Auditor would score each office and share the results with the Office Manager, Managing Dentist and Flow Coordinator. Any failied audits were reported to the Regional Manager and Clinical Director and corrective action was taken. I know Kay has discussed potentially bringing on a OSHA Compliance Trainer/Auditor in her department to take on a similar role but the initial instructions and expectation should be set forth by executive management. Jonathan Elosseini Operations Director Children's Dental Group Mobile: (310) 490-1278 Email: jelosseini@cdgdental.com

From: Maria

Gonzalez Sent: Monday, October 26, 2015 6:45 AM To: Dr. Jerry Minsky; Jonathan Elosseini Subject: RE: High Importance, CDG Anaheim, Items that need correction before 11-4-2015 HMO audit Good morning, Jonathan, can you educate me how this was handled in your previous experience? I suspect the proper protocol may be for you and to what ever degree you feel necessary to engage Kay. Just so you have background feedback lack of cleanliness has always been a concern in AH. Sam in SA appears to be more in tune with this in his office. SA has a heavier patient load than AH. What would you suggest? Thank you, MG

From: Jerry Minsky, DDS - HIPAA Secure

Email [jerryminskydds@emailpros.net] Sent: Sunday, October 25, 2015 3:48 PM To: Jonathan Elosseini; Maria Gonzalez Subject: High Importance, CDG Anaheim, Items that need correction before 11-4-2015 HMO audit 1. Barriers must be place on patient light

handles, patient light handle switches, and amalgamator control panels. They must be applied so they don't peel off. 2. Room one and two have broken amalgamator covers that need to be replaced. The amalgamators with broken covers must be replaced or repaired. If this cannot be completed by 11-4, the amalgamators with broken covers need to be removed from the treatment rooms and placed into a storage cabinet. 3. Floors in the bathroom are dirty. The bathrooms should be checked and cleaned throughout the day. 4. Amalgamator hygiene: The amalgam spill kit was not labeled. The amalgam spill kit storage area was labeled, however the spill kit was not in its proper place. Amalgam spill kit items need to be stored together. I had difficulty finding the scoop. The amalgam spill kit absorbent was the wrong kind. Alma Herrera has ordered the proper spill kit absorbent. Please contact her to obtain this absorbent. 5. Emergency kit. NO expired items. No used items are returned or placed in emergency kit. The emergency kit had a used glucose tube. This is an infection control hazard. The glucose must be single use. It should be replaced with a new tube each time it is used. All items cannot be expired. This include, band aids, thermometers, ammonia capsules, aspirin, syringes, etc. 6. Protective eyewear must be worn by all doctors. This is a Dental Board regulation. Doctors cannot keep extra masks or gloves in their pockets. Dr. Diaz was observed with masks in his pocket. 7. Language assistance signage must be present in the reception area (State law). 8. Dental Board signage about doctors licensing must be displayed in a nice frame. State Law. 9. Consent forms, Doctors must sign and date consent form before treatment is started and before sedation is given. The patients first and last name and chart number must be on each form. NO first name, last initial. The patient's parent or consent signer must sign and date all consent forms before sedation is given and before treatment starts. 10. Doctors must provide more treatment descriptions (type or name of cement used, the chemical used for the pulpotomy, comment regarding occlusion checked). 11. Doctors must date their own records. 12. Sedation records must be signed and dated by the doctors. (Dr. Abraham). 13. Dismissal time must be documented on the sedation record (Dr. Abraham). 14. Assistants must sign the sedation record. Jerry Minsky, DDS ---- HIPAA Secure Email Special Needs Dentistry with Hospital General Anesthesia (Sedation) PO Box 17430 Anaheim ,CA 92817 Phone: 562-860-8330 Fax: 714-363-5441 Website: jerryminskydds.com Click here for Secure Online Payment at our website Click here to download new patient forms Click here for Patient Financing Write a review on Yelp

From: Dr. Jerry Minsky <JMinsky@cdgdental.com>

Sent: 7/13/2016 12:41:12 PM -0700

To: Maria Gonzalez <mgonzalez@cdgdental.com>; Dr. Jerry Minsky

<jerryminskydds@emailpros.net>

Subject: RE: DR DIAZ

Yes, Sam needs to be advised.

If this is accurate and a doctor is not following infection control procedures it needs to be addressed.

From: Maria Gonzalez

Sent: Wednesday, July 13, 2016 10:28 AM To: Dr. Jerry Minsky; Dr. Jerry Minsky

Subject: RE: DR DIAZ

Good morning,

Is there anything I need to do here?

Thank you MG

From: Elma Irving

Sent: Wednesday, July 13, 2016 10:24 AM To: Dr. Jerry Minsky; Dr. Jerry Minsky Cc: Maria Gonzalez; Jonathan Elosseini

Subject: FW: DR DIAZ

Hi doc, here is that e-mail that you spoke to Claudia about yesterday just for the record.

Thank you,

Elma

From: Claudia Perez [mailto:c_perez87@yahoo.com]

Sent: Monday, July 11, 2016 2:06 PM

To: Elma Irving

Subject:

Hello Elma,

I'd like to share my thoughts with you about certain situations that have been coming up to my attention. There has been a few incidents that have happened with Dr. Diaz that I am not comfortable with. For Example, Dr. Diaz has told a few assistants including myself to have a "5 second rule" when instruments or anything falls on the floor. I've had a few conversations that have led to somewhat arguments with Dr. Diaz because he gets bothered when i either replace the instrument or go out and get a new one. He uses contaminated instruments to get pulp material out of Containers. He answers his phone with dirty gloves when working with patient. Another thing he does is when we hand

him the curing light he does not like us putting the orange shield on. I have repeatedly told him is to protect our eyes, his reply is "just don't look at it, I'm the one curing it not you" I've told him he cant show the patient the curing light when its on because it can damage their eyes. On (7-7-16) He used an irrigation syringe on a patient then he saw blood

splatter on his scrubs so he used that same syringe to put hydrogen peroxide on the stain. Another assistant told him that was not sanitary and that it was gross, he said "no its not, its just for now till i go home and change. He did the same thing twice. Thank you for hearing me out. Let me know if you have any questions.

Claudia Perez (Anaheim)

Children's Dental Meeting September 15, 2016

This meeting was called because of reports of some 8-10 children becoming ill with infections after Pulpotomy procedures performed at this dental office since late April to early May. The infections were not going away with normal antibiotics and some of the kids were hospitalized because of it. This meeting consisted of delegates from Children's Dental Group, Orange County Health Department, independent contractors and consultants.

Orange County Health Department, Doctors Zahn and Calvet had taken 53 test samples from various locations throughout the Children's dental office. As a result they narrowed the focus to the water supply. They had 6 samples in which the standard plate counts ranged from 610 – 16,000. They stated anything above 500 needs to be addressed. These 6 samples tested positive for a bacteria called Mycobacterium Abscessus. These samples seemed to point to the water unit tubes in the treatment rooms. The standard plate counts for the water from the Culligan system was low 70's and did not show and Mycobacterium Absessus.

At this time, Doctors Zahn and Calvet of the Orange County Health Department have given a formal order to immediately stop the use of any water use for patient care. The Conditions of Isolation are attached.

There were a few concerns reguarding SOPs of the handling of water and the refillable plastic containers that were used in the treatment rooms. The way the employees handled the tubing and non-sterilization of the bottles.

The Orange County Health Department, Doctors Zahn and Calvet would like all equipment that is in contact with the water supply inside the building removed and replaced.

The CEO of Children's Dental Group would like each company involved to submit a plan to remove and replace equipment. They would like this plan submitted to them by Wednesday September 21, 2016.

Lori Stockton

From:

Jonathan Elosseini

Sent:

Monday, July 11, 2016 02:32 PM

To:

Chris Sakamoto; Sam Gruenbaum

Subject:

Fwd: IMPORTANT !!!

Attachments:

UCI REPORT1.tif

FYI

Jonathan Elosseini Operations Director Children's Dental Group Mobile: (310) 490-1278

Email: jelosseini@cdgdental.com

Begin forwarded message:

From: "Elma Irving" < EIrving@cdgdental.com>

To: "Dr. Jerry Minsky" < JMinsky@cdgdental.com >, "Karla Morales"

< KMorales@cdgdental.com >, "Dr. Jerry Minsky" < jerryminskydds@emailpros.net >

Cc: "Maria Gonzalez" < mgonzalez@cdgdental.com >, "Jonathan Elosseini"

< <u>JElosseini@cdgdental.com</u>> Subject: RE: IMPORTANT !!!

Ok, so mom was ok to get records tomorrow by afternoon.

She was here and gave me copies of the other visits, apparently she was referred for biopsy at UCI Irvine by the doctor that we referred her to but when she was at UCI she was sent to CHOC. CHOC then referred her to the OMS this morning, so patient has had the run around from all these places for the pathology. The latter was not a provider for medical so she was given the fees for pathology which mom didn't go through because of the fees.

Per the OMS this morning whatever mom decides to do she needs to do it ASAP because it is not a good thing to wait.

So she basically wants us to either pay for this or find her a place that will cover the procedure without any costs, she said she had already missed so many days of work and does not have any money.

Please advise, anyone knows a place where we can send them? Please look into this paper works I sent you.

Thank you,

Elma

From: Dr. Jerry Minsky

EX NO 178
WIT: FRUIN 6
DATE: 6-4-19
CAROLYN GREGOR, CSR 2351

Sent: Monday, July 11, 2016 1:43 PM

To: Elma Irving; Karla Morales; Dr. Jerry Minsky; Cristina Cordova

Cc: Maria Gonzalez; Jonathan Elosseini

Subject: RE: IMPORTANT!!!

I spoke with Jonathan. He is going to followup with you shortly.

Sent from my Windows Phone

From: Elma Irving<mailto:Elrving@cdgdental.com>

Sent: 7/11/2016 1:10 PM

To: Karla Moralesmailto:KMorales@cdgdental.com; Dr. Jerry

Minsky<mailto:jerryminskydds@emailpros.net>; Cristina

Cordova<mailto:ccordova@cdgdental.com>

Cc: Dr. Jerry Minsky<mailto:JMinsky@cdgdental.com>; Maria

Gonzalez<mailto:mgonzalez@cdgdental.com>; Jonathan

Elosseini<mailto:JElosseini@cdgdental.com>

Subject: RE: IMPORTANT !!!

Hello, account number is #1073513 – Miguel Mercado.

Mom came upset about the bills that she has incurred on the pathology test and all the work days she is missing, she mentioned that we should take care of all of this for her since it all started when we did treatment on the patient. She also demanded the copy of records when she was told to give us 48 to 72 hours she mentioned it doesn't take that long to printout paper works I will be back to pick this up in a couple of hours.

Please advise if I can go ahead and print her copies.

Thank you,

Elma

From: Karla Morales

Sent: Monday, July 11, 2016 1:03 PM To: Dr. Jerry Minsky; Cristina Cordova

Cc: Elma Irving; Dr. Jerry Minsky; Maria Gonzalez; Jonathan Elosseini

Subject: Re: IMPORTANT !!!

Dr. minsky,

Patients mother is requesting a copy of her records. My understanding is that she is at the office now, and I am wondering if you can review the chart notes to ensure what we give her a copy of is legit.

Cristina -

Can you please review the account (financial perspective) and ensure everything was entered and billed accordingly?

Elma would like to respond to the patient as soon as possible.

Please advise.

Karla Morales

On Jul 11, 2016, at 11:40 AM, Jerry Minsky, DDS - HIPAA Secure Email < <u>jerryminskydds@emailpros.net</u> < <u>mailto:jerryminskydds@emailpros.net</u> >> wrote: If it is a Denti -cal dentist, the extraction and biopsy are a covered benefit.

Thank you.

Jerry Minsky, DDS, Ph: 562-860-8330

Sent from my Windows Phone

From: Elma Irving<mailto:Elrving@cdgdental.com>

Sent: 7/11/2016 10:50 AM

To: Dr. Jerry Minsky<mailto:jerryminskydds@emailpros.net>; Dr. Jerry

Minsky<mailto:JMinsky@cdgdental.com>

Cc: Maria Gonzalezmailto:mgonzalez@cdgdental.com; Jonathan

Elosseini<mailto:JElosseini@cdgdental.com>; Karla

Morales<mailto:KMorales@cdgdental.com>

Subject: FW: IMPORTANT !!!

Hi, I just received a call from the place where one of the patients is getting an extraction and biopsy mom told the facility that we're at fault and that we are going to pay for the patients fees for the extraction and biopsy. I confirmed with the staff and that there was in no time that we told mom we will cover for any expenses.

Please advise.

Thank you,

Elma

From: Elma Irving

Sent: Friday, July 08, 2016 3:39 PM

To: Dr. Jerry Minsky

Cc: Maria Gonzalez; Jonathan Elosseini; Karla Morales

Subject: FW: MISC!!! Importance: High

Hi, just an update a couple of these patients were referred to the OS and according to the OS doctor they sent patient to get a pathology biopsy so as soon as results are received she will be calling us to let us know.

Thank you,

Elma

From: Elma Irving

Sent: Friday, July 01, 2016 11:25 AM To: Dr. Jerry Minsky; Dr. Jerry Minsky

Cc: Maria Gonzalez; Jonathan Elosseini; Karla Morales

Subject: MISC !!! Importance: High

Hello, in the last couple of weeks we have seen a handful of patients that had contracted infection from a treatment of pulp/ssc that was done at least 1 month ago. The odd part is that even when the doctor extracted the tooth that was in question the patients seem to not get rid of the infection and in fact they have developed some type of cellulitis around the area of extractions. Dr Diaz has referred a couple of them to an OS. Per Diaz it could be the instruments that we use are not properly sterile or could possibly the pulp (viscostat). Here are some accounts can you please review and let us know what you think can this be.

1073513 – pulp/ssc done by Diaz on 05/05/16 and extraction was done by Olex on 06/10/16 up until 06/30 their some cellulitis on the area of extractions
#1217003 – pulp./ssc done by Pham on 05/03/16 and extraction was done by Diaz on 06/08/16 up until 06/13 their some cellulitis on the area of extractions
#1062554 – pulp/ssc done by Pamela on 05/18/16 and extraction was done by Diaz on 06/21/16 up until 07/01 their some cellulitis on the area of extractions

Please advise.

Thank you,

Elma



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1
             SUPERIOR COURT OF THE STATE OF CALIFORNIA
 2
             COUNTY OF ORANGE - COMPLEX JUSTICE CENTER
 3
 4
 5
 6
 7
     COORDINATION PROCEEDING SPECIAL ) JUDICIAL COUNCIL
     TITLE (RULE 3.350)
                                   ) COORDINATION
 8
                                         ) PROCEEDING NO. 4917
 9
     IN RE: CHILDREN'S DENTAL GROUP
10
11
12
13
14
15
16
          VIDEOTAPED DEPOSITION OF MATTHEW M. ZAHN, M.D.
17
                      COSTA MESA, CALIFORNIA
18
                      WEDNESDAY, JULY 10, 2019
19
                             VOLUME I
20
21
22
     JOB NO. 3401777
23
     REPORTED BY:
24
     CAROLYN GREGOR, CSR 2351, CRR, RMR, RDR
25
    PAGES 1 - 166
                                                        Page 1
```

1	overbroad.	
2	Q BY MR. MULLEN: Do you understand my question?	15:05
3	A I got to repeat back your question and make sure	15:05
4	I understand what you're saying.	
5	MR. MULLEN: Will you read it back to him,	15:05
6	please? I don't think I can say it again.	
7	THE WITNESS: Well, how about if I repeat back	15:06
8	what I think you because I think	
9	Q BY MR. MULLEN: Tell me what you think I asked	15:06
10	you.	
11	A I'm just making sure I get it right.	15:06
12	You're saying that if those bottles are not	
13	cleaned regularly, there's the potential for biofilm to	
14	form in those bottles. My answer to that would be yes.	
15	If there is biofilm formed in those bottles,	
16	could that be a potential source of contamination of the	
17	water as it goes to the patient? The answer to that is	
18	yes, that's a potential source to	
19	Q Okay. Let me ask you this: Once let's say	15:06
20	that water from the bottles gets into the system. Those	
21	biofilms will cling onto the plastic or the rubber	
22	tubing, correct? Isn't that what they do? They they	
23	live on inside and on the tubing?	
24	A There is the potential for biofilm forming at	15:06
25	any point along the lines of that of those systems.	
	Page 1	31

1	changed or washed. Left in place overnight."	
2	Do you know where you got that information?	
3	A Interview of staff at CDG.	L5:27
4	Q Do you know do you remember which staff? Was	L5:27
5	it a dental assistant? Was it the office manager? Was	
6	it Mr. Gruenbaum? Do you remember?	
7	A It would have been directly from staff. Which	L5:27
8	staff wouldn't I couldn't say. And I'm pretty sure we	
9	asked multiple staff just to make sure that we had the	
10	we had the story correctly.	
11	Q Did they volunteer this information, or did	15:28
12	you do you remember asking them?	
13	A No, we asked them, sure.	L5:28
14	Q Was that important to find out?	L5:28
15	A Sure.	15:28
16	Q You don't ask unimportant questions when you're	L5:28
17	investigating, right, or you	
18	A I try to avoid them.	L5:28
19	Q Okay. And they said: No, we don't we don't	L5:28
20	generally wash them and they are not changed; they stay	
21	overnight.	
22	Correct?	
23	A Correct.	L5:28
24	Q Does that cause you some concern for	L5:28
25	contamination or	
	Page 14	8

1 2 3 4 5	MR. KELLY: Objection Q BY MR. MULLEN: Or did it cause you concern at	15:28 15:28
3 4 5		15:28
4 5		
5	that time?	
	A Um, yes.	15:28
6	Q Why?	15:28
	A The concern was for potential contamination of	15:28
7	the water system. At that point, we were still figuring	
8	out exactly how water systems were supposed to be	
9	managed, you know, for general recommendations.	
10	But leaving leaving in place overnight would	
11	at least lend to the concern that you could have bacteria	
12	accumulation in those bottles.	
13	Q It could be like an incubator, correct?	15:29
14	MR. KELLY: Objection; vague and ambiguous.	15:29
15	THE WITNESS: It could be a source.	15:29
16	Q BY MR. MULLEN: A source.	15:29
17	If I take sterile water okay, there's no	
18	bacteria in it and I leave it on this table overnight.	
19	A In a sterile jar or a nonsterile jar?	15:29
20	Q In a sterile jar, everything is sterile about	15:29
21	it.	
22	A Yeah.	15:29
23	Q And then I come back the next day, is it	15:29
24	possible that it could have some germs in it, some	
25	bacteria?	
	Page	149

1	А	If both are truly stable, no, or sterile, no.	15:29
2	Q	If it's sterile, no?	15:29
3	А	Yeah. There if you have a sterile jar and	a 15:29
4	sterile	water, and you leave it overnight in a closed	
5	system,	you will not have bacteria.	
6	Q	How about what if it's open and it's just	tap 15:29
7	water, k	out it's 70	
8	А	Sure.	15:30
9	Q	it's 74 CFU's mL, or something along those	15:30
10	lines.		
11	А	If that's the case, then then	15:30
12	Q	Could the bacteria count go up? I mean, would	d 15:30
13	it be po	ossible that the water is going to be different	
14	because	you left it overnight?	
15		MR. KELLY: Incomplete hypothetical.	15:30
16		THE WITNESS: It's a potential.	15:30
17	Q	BY MR. MULLEN: Was there any testing done of	15:30
18	these bo	ottles to see if they had any biofilm in them	
19	or		
20	А	Yes.	15:30
21	Q	anything?	15:30
22	А	Yeah.	15:30
23	Q	What was done?	15:30
24	А	Um, we I believe what we did is we swabbed	15:30
25	the bott	tles themselves, the inside of the bottles	
		Pa	age 150

EXHIBIT N

CONSENTIMIENTO PARA TRATAMIENTO DE ODONTOLOGIA PEDIATRICA

NOMBRE: Nathan Cashill	O 80. D	E CUENTA: 12/75/12
ÓXIDO NITROSO Autorizo al dentista para que le administre óxido nitroso a mi		Iniciales: A,
para disminuir su ansiedad. Es posible que el óxido nitroso le		10
 DROGAS Y MEDICAMENTOS Entiendo que los antibióticos y analgésicos pueden causar rea 	reiones alérgicas tales como enrojecimiento e infla	mación de los tejidos, defor, comezón, vómito,
y/o shock anafiláctico (reacción alérgica severa)		
3. CAMBIOS DE TRATAMIENTO Entiendo que durante el curso de tratamiento puede haber cam	pios o adiciones debido a condiciones encontradas	Iniciales:
no fueron encontrados durante el examen inicial. Siendo el m todos los cambios y adiciones necesarias, después de haberme		
4. ANESTÉSICO LOCAL		Iniciales: A.C
Entiendo que el doctor utilizará un anestésico local para adorn controlar el dolor y las molestias asociadas con el tratamiento	lental. El adormecimiento podría durar varias hora	as después del tratamiento y entiendo que debo
vigilar a mi niño cuidadosamente y de seguir las instrucciones riesgos asociados con los anestésicos locales incluyen posibles	post-operativas para evitar que mi niño se muerdi	a el interior de las mejillas o la lengua. Otros
tiempo indefinido en el úrea de la inyección (parestesia), o palp		1.0
 RELLENOS El/la Dentista me explicó que la amalgama es un material y p 	roceso aceptado por la ADA, y por lo tanto es ur	Iniciales: A. L
También me explicaron las ventajas y desventajas de utilizar of 6. EXTRACCIONES (Sucar los dientes)		Iniciales:
Me han explicado las alternativas para evitar las extraccione	s (rellenos, coronas, tratamiento de endodoncia)	y autorizo al demista para que le baga las
extracciones necesarias de acuerdo con el plan de tratamiento tratamiento adicional. Mi niño podría sentir dolor, inflamación		
dieron y estoy de acuerdo en conunicarme con esta oficina dent 7. PULPOTOMÍAS (Trafamiento de nervio)		
Entiendo que una pulpotomia es necesaria cuando la caries ha	penetrado la pulpa del lliente, exponiendo el nervio	. Este procedimiento previene la infección o
ayuda a curarla si el diente ya está infectado. Los dentistas co procedimiento tiene una efectividad del 90%. Si una pulpotom	n frecuencia se refieren a este procedimiento como a fracasa, entiendo que podría ser necesario extrac	o una canalización en un diente de leche. Este — r el diente y colocar un aparato para mantener
el espacio, hasta que salga el diente permanente. Si no se le hac 8. CORONAS		
Me han informado que mi niño necesita coronas en uno o más o		is de acero inoxidable, ya que son más fuertes
y durables. También puedo pedir coronas blancas o que le por opciones con el doctor y/o consejero de tratamiento para confire		
coronas blancas o frentes blancos y el doctor está de acuerdo, el Pida yer muestro muestrario de fotografías.		
9. MANTENIMIENTO DE ESPACIO .		Infefales:
Me han informado que se necesita colocar un aparato para mant espacio abierto para que el diente permanente pueda salir adec		
moverse, causando que los dientes permanentes salgan torcidos el aparato para mantener el espacio no garantiza que los diento		
severos y costosos, los cuales tardan más en corregirse. Pida ver		
10. PLACA PARA DIENTES DELANTEROS Entiendo que las placas se usan para reemplazar dientes delanter		
una bonita sonrisa, y de esta manera evitará los complejos aso problemas de pronunciación y facilita la musticación adecuada de	clados con la apariencia de sus dientes. Además	s, la placa ayuda a prevenir el desarrollo de
dientes defanteros. Los dientes defanteros no tienden a moverse	es muy raro que haya consecuencias con los dient	es permunentes delanteros. Por lo general no
se recomienda utilizar una placa para reemplazar un solo diente, seguro dental, y que de ser así, yo sería totalmente responsable de		5. 10
IL USO DEL BAÑO Aŭtorizo al dentista y/o a sus asistentes a llevar a mi niño/a al bai	a si esto fuerá necesacio.	Intelales: At
12. PADRE, MADRE O GUARDIAN EN LA SALA DE TR	ATAMIENTO	Infeliales: A,C
Me han informado que no estaré presente durante el tratamiento o		
Por medio de la presente pido y autorizo a los demistas y su personal pa hueso y tejidos de mi niño(n), de la manera que me fue explicado. Me hau ex	plicado ampliamente el efecto y naturaleza del proceso a lley	also à cabo, los riesgos involuciados, al igual que los
métodos de tratamiento alternos. También autorizo al dentisia y a sus avistentes la condición descrita en la forma de diagnóstico de tratamiento, y/o a atender es	ndiciones insolubles e imprevistas encontradas durante el curs	o del trutamiento.
Se que la práctica de odontología no es una ciencia evacto, y por lo tanto garántia o seguridad sobre el tratamiento que por medio de la presente solicito y	autorizo.	
También entiendo que es mi responsabilidad informar al dentista si mi complicaciones.		
Me han explleado las alternátivas y reacciones posibles clara y detallad cicatización, contracciones, posibles deformidades, prolongación en el perío describidados en el perío describidados en el perío describidados en el perío de la contracciones posibles deformidades, prolongación en el perío de la contracciones de la contracciones posibles de la contracciones de la contracciones de la contracciones posibles de la contracciones de la contraccione de la co	do de recuperación, reacciones a caulquier droga o medica	mento antes, durante y después del procedimiento,
adonnecimiento o consezón en la lengua. lablo, dientes, tejidos (parestesta), frac CERTIFICO QUE HE LEIDO Y ENTIENDO COMPLETAMENTE ES ESTE SE INDICAN. TOPO LO QUE NO ENTENDI ME FUE EXPLICADO.	TE CONSENTIMIENTO DE TRATAMIENTO DENTALA	Y QUE RECIBÍ LAS EXPLICACIONES COMO EN
	Parentesco: Mama	- 101010
·		
Doctor:	Testign:	Feohat.

E

CONSENTIMIENTO PARA TRATAMIENTO DE ODONTOLOGIA PEDIATRICA

MANDER STRUCTURE. 1. OXIDO STRUCTURE dept. le administre extra filtenen a un titilu durante un tratamento ciunta. El rivola minora se militra para apolar a un minor archature y para disminum variavelada. Es posdes que el divado minora fe provaspa distinca. 2. DROGAS VINDICAMENTO. Entrendu que los antificiosos y analyseos parefen consus traciones sifegos tales y como emojeciminento e utlamacem de las fajolas, pode, contreño, ventos y desenvolves en acciones acciones entrenas consuminatores de la consultata de la completa del completa de la completa de la completa del completa de la completa del completa de la co	NOMBRE: Nathan Cashilo	NO. DE CUENTA: _[2 17.5]2
Admirect of Internation para quick admirect or that site richous in miles determined and admiration format. I finds the control of the contro	(AVINA STEDACA	Iniciales: .
para dissummar sameschal. Es posidio que efecto macra tracteriores alégicas tales como empiremento e utilimaceum de los legidos. Jobas como control. Sonto. Fateranti que los antibiolecos y antigêneros pueden cauxa tracteriores alégicas tales como empiremento e utilimaceum de los legidos, dodos como como de la como de	Autorizo al dentista para que le admunistre oxido nitroso a un niño durante su tratamiento denta	d. El óyido miroso se utiliza para ayudar a mi mño a relatarse y
Entendin que d'un abbléticos y analyticos prefer outre tracciones aférgicos tales cento entojecimiento e utilimación de los (glibas afont control) y do shed multifactor traccional proceso estado y de son de la control de la co	para dismumu su anxiedad. Es posible que el 6xido muoso le provoque nause as	<i>λ</i> (''
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optimies, to monetario bando per de pengan un materia tando a la cumina de acto movimas, y que no siempo dan resultado, 81 pilos octoronas blancas o frente blances y el doctor está de acuerdo, entiendo que mi segaro dental pudría no cubrir los costos y yo seria responsible por el costo inda. Pala vez muesto muestrario de, fenoraria fas. 9. MANTENIMIENTO DE ESPACIO Me ban informado que we necesta voloca un aparato para mantener el espacio acuando se pierde un diente de leche antes de la normal. Este aparato mantiene el espacio abreto para que el diente permanentes solgan torcido o encimados. Si no se coloca un aparato para mantener el espacio y que son importantes por varias razones. Primero, la placa ayudará a que imitimo mantenga mantener el espacio mantenar evidad foi ecumplejos axociados con la apariencia de sus dientes. Adomás, la placa ayudará a que imitimo mantenga mantener el espacio para recipidar de les adimentos. Tambide entiendo que la placa nue su eccarara para mantener el espacio para los dientes delantenos. Los dientes delantenos nu tienden a moveres y es en injárno que individa y que los dentes permanentes delantenos. Los dientes delantenos. Los dientes delantenos delantenos nu tienden a moveres y es en injárno que haya consecuencia can los delanteres. Por los general ne recomiendo dultirar una placa para pa	Mr. to a left and the man with marries groups on man a man dienter. Pritigado que el destot p	refiere usar coronas de acero inoxidable, ya que son más fuertes
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9. MANTENNIMENTO DE ESPACIO Me han informato que se necesta colocar un ajarato para mantener el espacio cuando se pierde un diente de leche antes de la montal Este apartato mantiener el espacio alterito. De Servicio alterito para que el diente permanente pueda salir adecundamente. Si no se coloca un ajarato para mantener el espacio abtento, los dientes pedran moverse, cansando que los dientes permanentes salgan torcidos o encimados. Ciando evo steede, podrán necesitarse tratamiento ortodomico (frenes). Aunque el aparato para mantener el espacio no garantiza que los dientes saldrán user convegires. Plad ver miestro munectanto de consecutor, de cuada con convegires plad ver miestro munectanto de fotografías. 10. PLACA PARA DIENTES DELANTEROS Inticialor y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a que mi niño mantenga una bonita sourion, y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a que mi niño mantenga una bonita sourion, y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a va que mi niño mantenga una bonita sourion, y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a va que mi niño mantenga una bonita sourion, y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a va que mi niño mantenga una bonita sourion y de esta mantera evitará los complejos acociados con la apariencia de sus dientes. Adentás, la placa ayudar a de desarrollo de problemas de prontunciación y facilita la masticación alecuada de los adentas. Adentas placa para membra debantera una para para mantener el espacio para una templa de la desarrollo de problemas debanteras. Los adentes debanteres. Por lo general nor se crounicinal suffizar una placa para recupidazar missionale de en conto perdene propo manteritar de las departantes de la sufficial de	opciones con el dictor y/o consejero de trafamiento para confumar que un unito es candidato para	ria no cubrir los costos y yo sena tesponsable por el costo totai.
MANTENNIHENTO DE ESPACIO Me han informado que se necesta coloca un aparato para mantener el espacio cuando se pierde un diente de leche antes de la normal. Este aparato imanticure el espacio abierto, los dientes pedran moveres, causando que los dientes permanentes salgan torerdos o encimados. Cuando evo sucede, podrá necesitarse tratamiente o relocatoro (frenos). Adanque el aparato para mantener el espacio no ganantas que los dientes spadima desenvo, entiendo que el no usario podrá resultar en problemas de ortoduncio mas vezeros, y costoros, los cudes tardan más en curregires. Pida vez miestro muestrato de fotografías. 10. PLACA PARA DIENTES DELANTEROS Entiendo que las placas se usan para reemplazar dientes defanteros y que són importantes por varias razones, Primero, la placa apadrá a que mi niño mantenga una bonita sourisa, y de esta mantera evitad fos complejos asociados con la apariencia de ata dientes. Adenás, la placa apadrá a que mi niño mantenga una bonita sourisa, y de esta mantera evitad fos complejos asociados con la apariencia de ata dientes. Adenás, la placa apadrá a que mi niño mantenga una bonita sourisa, y de esta manten evitada fos complejos asociados con la apariencia de ata dientes. Adenás, la placa apadrá a requerir el desarrollo de problemas de pronuteríación y lacilita la mantenerir de complejos asociados con la apariencia de ata dientes. Adenás, la placa apadrá a requerir el desarrollo de incidenteros. Los dientes defanteros no tenden a moverie y es miy girar que haya consecuencias con los dientes permanentes delonteros. Por lo general nos ereconnicias definitor sul palaca para reemplazar un sulo diente. Me han informado que la placa no es necesaria para mantener el espacio para de seguno defantes y un palaca para reemplazar un sulo diente. Me han informado que la peda para reemplazar un sulo diente. Me han informado que la cetta porta de demista y os asociantes a la baño si esto tueta necesario. 11. USO DEL BAÑO Altorizo del demista y/o a sus asostentes a llevar a mi niño fal. Por	Pida ver questro inuestrario de fotografías.	
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Por medio de la presente podo y autorizo a los dertistas y su personal paraque obuguen los cervicos debales necesanos a fin de necjono la apariencia, lovaros y solud de la becca, dientes bursos y tendo de no mil sea, de la mareta que me fin coplicado. Me han explicado amplianene el efacto y naturalera del proceso a llevarse a cabo, los nesgos involorizados, al spuid que homenvito de manúcino adrenos. También autorizo al derátita y a sus consentes parque electrico cardigide dito procedimiento que parque necesarios i reconstable el interactivo de destrabações no e una reineita e voa ta, y por los tantos en indicioner, insolubles e imprevistas encontradas datarate el curso del tindamento. Se que la práctica de educado para estra cientes estas aportadas obre el tratamiento que per medio de la prevente orbito y autorizo. También contendo que es no responsibilidad informat al denosta si nel tinto preventa problemas después del finalmento, para que él o ella puedan ayadar a minorizar civalquier tipo de complicaciones. También contracciones, problemas problemas posibles eltra y detalladimente. También me explicano characterios contracciones, problemas delormádales, probugación en el tempos parables en el período de temperación, conciones a cualquier droga o medicamento nates, daracter y después del procedimarento conceniones, problemas delormádales, probugación en el tempos parables en el período de temperación, conciones a cualquier droga o medicamento nates, daracter y después del procedimarento conceniones, problemas delormádales, probugación en el tempos parables en el período de temperación, conciones a cualquier droga o medicamento nates, daracter y después del procedimarento conceniones, problemas delormádales, probugación en el período de temperación de la procedimarento conceniones, problemas delormádales probugación en el período de temperación de la procedimarento delormádales probuses de procedimarento delormádales probuses del procedimarento delormádales delormádales probuses dela que del concenio de pro	12. PADRE, MADRE O GUARDIAN EN LA SALA DE TIGATAMIENTO Na homortogrado que no estado prosente durante el tratamiento de munifio (u).	Name of the same o
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From: "Plevin, Rebecca" <rplevin@scpr.org>

Sent: 9/21/2016 2:56:56 PM -0700

To: Sam Gruenbaum <SGruenbaum@cdgdental.com>

Subject: Re: From KPCC Thanks, Sam, for your quick response.

A couple more questions: Do you have an idea of how many kids received pulpotomies at Children¹s Dental Group in Anaheim since April 1?

Also, is it correct to call a pulpotomy a baby root canal or a baby tooth root canal? I¹ve seen this in other reports.

Thanks. I¹m on deadline for this afternoon.

Rebecca Plevin Health Reporter

Southern California Public Radio 89.3 KPCC 847-269-7401 (cell) @rebeccaplevin

On 9/21/16, 1:24 PM, "Sam Gruenbaum" <SGruenbaum@cdgdental.com> wrote:

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>Rebecca, thank you for coming to us with your question. We are working
>closely with the families involved, including providing copies of
>patient's charts when requested. It usually takes about a day to
>complete this process. We are not withholding charts.
>Sam Gruenbaum
>From: Plevin, Rebecca [rplevin@scpr.org]
>Sent: Wednesday, September 21, 2016 11:03 AM
>To: Sam Gruenbaum
>Subject: From KPCC
>Hi Sam -
>I<sup>1</sup>m a reporter for KPCC, the NPR station in LA. Last week, we ran a story
>about your clinic, and it included a quote from the father of the
>4-year-old girl who was hospitalized with a mycobacterial infection. It
>says he tried to get his daughter¹s medical records, but the clinic
>refused to hand them over.
>I wanted to follow up and see if the clinic is giving parents kids1
>medical records or withholding them? Any clarity on this would be greatly
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>appreciated. This is for something I¹m working on for this afternoon.

```
> Thanks in advance I look forward to hearing from you,
>Rebecca
>
> Rebecca Plevin
>Health Reporter
> Southern California Public Radio
>89.3 KPCC
>847-269-7401 (cell)
>@rebeccaplevin
>
```

Lori Stockton

From:

Jonathan Elosseini

Sent:

Monday, July 11, 2016 02:32 PM

To:

Chris Sakamoto; Sam Gruenbaum

Subject:

Fwd: IMPORTANT !!!

Attachments:

UCI REPORT1.tif

FYI

Jonathan Elosseini Operations Director Children's Dental Group Mobile: (310) 490-1278

Email: jelosseini@cdgdental.com

Begin forwarded message:

From: "Elma Irving" < EIrving@cdgdental.com>

To: "Dr. Jerry Minsky" < JMinsky@cdgdental.com >, "Karla Morales"

< KMorales@cdgdental.com >, "Dr. Jerry Minsky" < jerryminskydds@emailpros.net >

Cc: "Maria Gonzalez" < mgonzalez@cdgdental.com >, "Jonathan Elosseini"

< <u>JElosseini@cdgdental.com</u>> Subject: RE: IMPORTANT !!!

Ok, so mom was ok to get records tomorrow by afternoon.

She was here and gave me copies of the other visits, apparently she was referred for biopsy at UCI Irvine by the doctor that we referred her to but when she was at UCI she was sent to CHOC. CHOC then referred her to the OMS this morning, so patient has had the run around from all these places for the pathology. The latter was not a provider for medical so she was given the fees for pathology which mom didn't go through because of the fees.

Per the OMS this morning whatever mom decides to do she needs to do it ASAP because it is not a good thing to wait.

So she basically wants us to either pay for this or find her a place that will cover the procedure without any costs, she said she had already missed so many days of work and does not have any money.

Please advise, anyone knows a place where we can send them? Please look into this paper works I sent you.

Thank you,

Elma

From: Dr. Jerry Minsky

EX NO 178

WIT: # RVIN 6

DATE: 6-4-19

CAROLYN GREGOR, CSR 2351

Sent: Monday, July 11, 2016 1:43 PM

To: Elma Irving; Karla Morales; Dr. Jerry Minsky; Cristina Cordova

Cc: Maria Gonzalez; Jonathan Elosseini

Subject: RE: IMPORTANT!!!

I spoke with Jonathan. He is going to followup with you shortly.

Sent from my Windows Phone

From: Elma Irving<mailto:Elrving@cdgdental.com>

Sent: 7/11/2016 1:10 PM

To: Karla Moralesmailto:KMorales@cdgdental.com; Dr. Jerry

Minsky<mailto:jerryminskydds@emailpros.net>; Cristina

Cordova<mailto:ccordova@cdgdental.com>

Cc: Dr. Jerry Minsky<mailto:JMinsky@cdgdental.com>; Maria

Gonzalez<mailto:mgonzalez@cdgdental.com>; Jonathan

Elosseini<mailto:JElosseini@cdgdental.com>

Subject: RE: IMPORTANT !!!

Hello, account number is #1073513 – Miguel Mercado.

Mom came upset about the bills that she has incurred on the pathology test and all the work days she is missing, she mentioned that we should take care of all of this for her since it all started when we did treatment on the patient. She also demanded the copy of records when she was told to give us 48 to 72 hours she mentioned it doesn't take that long to printout paper works I will be back to pick this up in a couple of hours.

Please advise if I can go ahead and print her copies.

Thank you,

Elma

From: Karla Morales

Sent: Monday, July 11, 2016 1:03 PM To: Dr. Jerry Minsky; Cristina Cordova

Cc: Elma Irving; Dr. Jerry Minsky; Maria Gonzalez; Jonathan Elosseini

Subject: Re: IMPORTANT !!!

Dr. minsky,

Patients mother is requesting a copy of her records. My understanding is that she is at the office now, and I am wondering if you can review the chart notes to ensure what we give her a copy of is legit.

Cristina -

Can you please review the account (financial perspective) and ensure everything was entered and billed accordingly?

Elma would like to respond to the patient as soon as possible.

Please advise.

Karla Morales

On Jul 11, 2016, at 11:40 AM, Jerry Minsky, DDS - HIPAA Secure Email < <u>jerryminskydds@emailpros.net</u> < <u>mailto:jerryminskydds@emailpros.net</u> >> wrote: If it is a Denti -cal dentist, the extraction and biopsy are a covered benefit.

Thank you.

Jerry Minsky, DDS, Ph: 562-860-8330

Sent from my Windows Phone

From: Elma Irving<mailto:Elrving@cdgdental.com>

Sent: 7/11/2016 10:50 AM

To: Dr. Jerry Minsky<mailto:jerryminskydds@emailpros.net>; Dr. Jerry

Minsky<mailto:JMinsky@cdgdental.com>

Cc: Maria Gonzalezmailto:mgonzalez@cdgdental.com; Jonathan

Elosseini<mailto:JElosseini@cdgdental.com>; Karla

Morales<mailto:KMorales@cdgdental.com>

Subject: FW: IMPORTANT !!!

Hi, I just received a call from the place where one of the patients is getting an extraction and biopsy mom told the facility that we're at fault and that we are going to pay for the patients fees for the extraction and biopsy. I confirmed with the staff and that there was in no time that we told mom we will cover for any expenses.

Please advise.

Thank you,

Elma

From: Elma Irving

Sent: Friday, July 08, 2016 3:39 PM

To: Dr. Jerry Minsky

Cc: Maria Gonzalez; Jonathan Elosseini; Karla Morales

Subject: FW: MISC!!! Importance: High

Hi, just an update a couple of these patients were referred to the OS and according to the OS doctor they sent patient to get a pathology biopsy so as soon as results are received she will be calling us to let us know.

Thank you,

Elma

From: Elma Irving

Sent: Friday, July 01, 2016 11:25 AM To: Dr. Jerry Minsky; Dr. Jerry Minsky

Cc: Maria Gonzalez; Jonathan Elosseini; Karla Morales

Subject: MISC !!! Importance: High

Hello, in the last couple of weeks we have seen a handful of patients that had contracted infection from a treatment of pulp/ssc that was done at least 1 month ago. The odd part is that even when the doctor extracted the tooth that was in question the patients seem to not get rid of the infection and in fact they have developed some type of cellulitis around the area of extractions. Dr Diaz has referred a couple of them to an OS. Per Diaz it could be the instruments that we use are not properly sterile or could possibly the pulp (viscostat). Here are some accounts can you please review and let us know what you think can this be.

1073513 – pulp/ssc done by Diaz on 05/05/16 and extraction was done by Olex on 06/10/16 up until 06/30 their some cellulitis on the area of extractions
#1217003 – pulp./ssc done by Pham on 05/03/16 and extraction was done by Diaz on 06/08/16 up until 06/13 their some cellulitis on the area of extractions
#1062554 – pulp/ssc done by Pamela on 05/18/16 and extraction was done by Diaz on 06/21/16 up until 07/01 their some cellulitis on the area of extractions

Please advise.

Thank you,

Elma



PROOF OF SERVICE

COORDINATION PROCEEDING Special Title: CHILDREN'S DENTAL GROUP CASES

Judicial Council Coordination No JCCP 4917 Orange County Superior Court, Civil Complex Center

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am over the age of 18, employed in the County of Orange, State of California, and not a party to the within action. My business address is 9210 Irvine Center Drive, Irvine, California 92618.

On July 30, 2019, the document(s) entitled: SUPPLEMENTAL FILING IN FURTHER SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT TO CLAIM PUNITIVE DAMAGES AGAINST THE CDG DEFENDANTS PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 425.13 was served on the interested parties in this action by placing true copies thereof to be delivered/addressed as follows:

[SEE ATTACHED SERVICE LIST]

- BY ELECTRONIC SERVICE ONLY VIA THE CASE ANYWHERE SYSTEM: I transmitted a true copy of the above entitled documents(s) to the Case Anywhere for service and notification on all parties as registered pursuant to the Case Management Order.
- STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 30, 2019 at Irvine, California.

Val Kesler

7/30/2019 Case Anywhere

Electronic Service List

Children's Dental Group Cases Case:

JCCP 4917, Orange County Superior Court Case Info:

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Representing: Plaintiffs

Representing: J&G Dental Advisors, LLC

Jerry Minsky, D.D.S., Dental Corp.

Marsha Jacks

Samuel H. Gruenbaum

Scott Jacks, D.D.S., Inc. d/b/a Children's Dental

Group

Sierra Pacific Dental Consultants, LLC

Representing: Plaintiffs

Representing: Plaintiffs

Representing: Plaintiffs

Representing: Jerry Minsky, D.D.S.

Representing: Plaintiffs

7/30/2019

Case Anywhere

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