

Exhibit M

Meghan Weger Deposition

Vargas

Weger Meghan

11/10/2020

Condensed Transcript

Prepared by:

Bill Ragen
CCSAO

Tuesday, August 31, 2021

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4
5 LETICIA VARGAS,)
Administrator of the)
6 Estate of ANGEL CRUZ,)
Plaintiff,)
7 vs.) Case No. 18 CV 1865
SHERIFF OF COOK COUNTY,)
8 COUNTY OF COOK, AUGUSTUS)
ALABI, AVIS CALHOUN,)
9 LORRAINE CHATMAN, ANITA)
JOHNSON, HELEN KANEL,)
10 CHERRI KRZYZOWSKI,)
ELIZABETH P. LASSEN,)
11 MANUEL MANALASTAS, DR.)
STEVE PASCHOS, JASON)
12 SPRAGUE, and JARUWAN)
SUPASANGUAN,)
13 Defendants.)
The deposition of MEGHAN WEGER, called for
14 examination pursuant to the Rules of Civil
15 Procedure for the United States District Courts
16 pertaining to the taking of depositions, taken
17 before CHRISTINE M. PINA, a Certified Shorthand
18 Reporter remotely via Zoom, within and for the
19 County of Cook and State of Illinois in Chicago,
20 Illinois, on November 10, 2020 at the hour of
21 2:00 o'clock p.m.
22 (Deposition concluded at 2:48 p.m.)
23 Reported by: CHRISTINE M. PINA, CSR, RPR
24 License No.: 084-003785

Page 2

1 APPEARANCES:
2 KENNETH N. FLAXMAN, P.C.
3 BY: MR. KENNETH N. FLAXMAN - VIA ZOOM
4 MR. DIMITRI DIAGNE - VIA ZOOM
5 200 South Michigan Avenue, Suite 201
6 Chicago, Illinois 60604
7 (312) 427-3200
8 knf@kenlaw.com
9 on behalf of the Plaintiff;
10 STATE'S ATTORNEY'S OFFICE OF COOK COUNTY
11 BY: MR. WILLIAM RAGEN - VIA ZOOM
12 Richard J. Daley Center, Suite 300
13 Chicago, Illinois 60602
14 (312) 603-6539
15 william.ragen@cookcountyil.gov
16 on behalf of Augustus Alabi, Lorraine
17 Chatman, Helen Kanel, Elizabeth
18 Lassen, Manuel Manalastas, Jason
19 Sprague, and Jaruan Supasanguan;
20
21
22
23
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Page 3

1 APPEARANCES: (Continued)
2 ASSISTANT STATE'S ATTORNEY
3 BY: MR. FRANCIS J. CATANIA - VIA ZOOM
4 50 West Washington Street, Suite 2760
5 Chicago, Illinois 60602
6 (312) 603-6572
7 francis.catania@cookcountyil.gov
8 on behalf of Cook County;
9 CUNNINGHAM, MEYER & VEDRINE
10 BY: MR. THOMAS TOMASIK - VIA ZOOM
11 4200 Cantera Drive
12 Warrenville, Illinois 60555
13 (630) 260-5600
14 ttomasik@cmvllaw.com
15 on behalf of the deponent.
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Page 4

1 I N D E X
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4 WITNESS EXAMINATION
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6 MEGHAN WEGER
7 By Mr. Ragen 6
8 By Mr. Catania 23
9 By Mr. Flaxman 25
10 Further By Mr. Ragen 34
11 Further By Mr. Catania 36
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17 E X H I B I T S
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19 NUMBER MARKED FOR ID
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22 NO EXHIBITS MARKED BY REPORTER
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<p style="text-align: right;">Page 5</p> <p>1 THE COURT REPORTER: This deposition is being 2 taken by means of videoconferencing, and the oath 3 will be administered remotely by the court reporter 4 pursuant to Governor Pritzker's Executive Order 5 2020-14. Are all parties in agreement with this 6 procedure? 7 MR. FLAXMAN: Yes for Plaintiff. 8 MR. RAGEN: For Defendant Cook County and all 9 the individually-named Cook County employees, yes. 10 MR. CATANIA: The Sheriff of Cook County, yes. 11 MR. TOMASIK: Tom Tomasik on behalf of the 12 witness, we agree. 13 (Whereupon, the witness was 14 duly sworn.) 15 MR. RAGEN: Your name is Meghan, M-e-g-h-a-n, 16 Weger, W-e-g-e-r? 17 THE WITNESS: Yes. 18 MR. RAGEN: Just to go through a couple of 19 ground rules. Conversationally, we can talk over 20 each other and usually you know what I'm going to 21 say, but please wait for me to finish what I'm 22 going to say; otherwise, Christy, our court 23 reporter, will have a hard time taking it down, 24 okay?</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. That was 2016, correct? 2 A. Correct. 3 Q. Where are you currently employed? 4 A. At Adventist Hinsdale Hospital. 5 Q. In 2016, you were employed at Adventist 6 Hinsdale Hospital? 7 A. Yes. 8 Q. When did you start working at Adventist 9 Hinsdale Hospital? 10 A. In 20 -- well, I first started in 2008 as 11 a phlebotomist, and then, when I graduated nursing 12 school, I went up to the unit on the second floor 13 in 2014 when I was hired on as a nurse. 14 Q. And then in 2014, that's when you became 15 an R.N., right? 16 A. Yes. 17 Q. Even though you obtained an additional 18 degree as a B.S.N. in 2016, did your role stay the 19 same for the most part? 20 A. Yes. 21 Q. When you say the second floor, what does 22 that mean to me whose only been to Hinsdale 23 Hospital a couple of times? 24 A. It's at medical-surgical oncology floor.</p>
<p style="text-align: right;">Page 6</p> <p>1 THE WITNESS: Uh-huh. 2 MR. RAGEN: Was that a "yes"? 3 THE WITNESS: Yes. Sorry. 4 MR. RAGEN: Also, too, from time to time, I'll 5 ask a question you don't understand. If you don't 6 understand my question, would you please tell me? 7 THE WITNESS: Yes. 8 MR. RAGEN: If you answer my question, I will 9 assume you understood it, is that fair? 10 THE WITNESS: Yes. 11 MEGHAN WEGER, 12 having been first duly sworn, was examined and 13 testified as follows: 14 EXAMINATION 15 BY MR. RAGEN: 16 Q. You are a Registered Nurse? 17 A. Yes. 18 Q. Where did you go to undergrad? 19 A. I went to Morton College. I graduated 20 with my Associates in Applied Science in Nursing in 21 2014, and then, I went on for my bachelors at 22 Purdue University and I graduated in 2016. 23 Q. Is that a Bachelors of Nursing? 24 A. Bachelor of Science in Nursing.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. We're here to talk about the care you 2 rendered to Mr. Cruz, and it looks to me from the 3 medical records that all happened on the general 4 medical floor? 5 A. Yes. 6 Q. Did you review anything for your 7 deposition today? 8 A. I reviewed my chart. 9 Q. The one thing I will say is I hope not to 10 ask you a question that would trigger what you and 11 your attorney spoke about, but in the event that I 12 do, don't talk about what you discussed with your 13 attorney, okay? 14 A. Yes. 15 Q. How many pages did you look at? Do you 16 have it there? 17 A. We have it here, yes. 18 Q. Those are the documents? About how many 19 pages are they? 20 A. Like almost 300. 21 MR. TOMASIK: He wants to know in front of you 22 right now how many pages are there. 23 THE WITNESS: Well, there's Page 40 of 294, so 24 I don't know.</p>

<p style="text-align: right;">Page 9</p> <p>1 BY MR. RAGEN:</p> <p>2 Q. Just to me it looks like looking at the</p> <p>3 stack 294 tends to be a stack like I think high,</p> <p>4 you know what I mean, and so that's less than that,</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. Is it like 25 pages because then I would</p> <p>8 just get the page numbers down?</p> <p>9 A. No.</p> <p>10 Q. Can you just pick up the paper so I can</p> <p>11 take a look how thick the stack is? All right.</p> <p>12 Well, does it appear to be your nursing notes?</p> <p>13 A. Yes.</p> <p>14 Q. In reviewing those documents, did you feel</p> <p>15 the need to look at anything else?</p> <p>16 A. As opposed to what, anything else?</p> <p>17 Q. Well, for example, from time to time when</p> <p>18 you're providing nursing care, have you ever looked</p> <p>19 at laboratory results?</p> <p>20 A. When I'm providing care for a patient?</p> <p>21 Q. Yes.</p> <p>22 A. Yes, in the chart.</p> <p>23 Q. Right. Okay. And so you don't have</p> <p>24 laboratory results there, is that fair?</p>	<p style="text-align: right;">Page 11</p> <p>1 lactic acid was elevated, and that's all I</p> <p>2 remember.</p> <p>3 Q. It appears from the records that you</p> <p>4 treated this gentleman on the evening of March 13</p> <p>5 going into the morning of March 14?</p> <p>6 A. Yes.</p> <p>7 Q. What time would your shift have started</p> <p>8 and ended?</p> <p>9 A. We start at 6:45 p.m. and work until</p> <p>10 7:15 a.m.</p> <p>11 Q. Did you say 7:15 a.m.?</p> <p>12 A. Correct.</p> <p>13 Q. Could you turn to Page 237 or 238, if you</p> <p>14 have it there?</p> <p>15 A. What page, 237?</p> <p>16 Q. I do want to go to 237, but where it says</p> <p>17 like 237 of 294. You might have multiple like page</p> <p>18 numbers on there.</p> <p>19 MR. TOMASIK: She's there.</p> <p>20 BY MR. RAGEN:</p> <p>21 Q. So, that's something you reviewed in</p> <p>22 preparation for this deposition?</p> <p>23 A. Yes.</p> <p>24 Q. Can you tell me what you observed in</p>
<p style="text-align: right;">Page 10</p> <p>1 A. I think I do. I don't know. I don't</p> <p>2 think it's on here.</p> <p>3 Q. So, my question is real general. When you</p> <p>4 were reviewing what you reviewed, did you think oh,</p> <p>5 maybe I should look at something else or I need to</p> <p>6 look at the labs or I would like to look at the</p> <p>7 doctor's notes or I want to look at the eMAR to the</p> <p>8 extent that you don't have all the eMARs?</p> <p>9 A. In reviewing this, no.</p> <p>10 Q. When we go through this deposition, if at</p> <p>11 any point in time you say, you know what, in order</p> <p>12 to answer a question, I'd like to look at the whole</p> <p>13 medical records, we can do that. Tom might have a</p> <p>14 set there. It looks like you're at the CMV</p> <p>15 spaceship, and when I say CMV spaceship, it's their</p> <p>16 offices. And then, also, too, I can provide it on</p> <p>17 the share screen, okay?</p> <p>18 A. Okay.</p> <p>19 Q. Do you have any independent recollection</p> <p>20 of Mr. Cruz?</p> <p>21 A. I remember that he was a patient that was</p> <p>22 admitted for psychosis, and allegedly he was under</p> <p>23 arrest for apparently stabbing his parents. So, he</p> <p>24 was admitted for psychosis, and I believe his</p>	<p style="text-align: right;">Page 12</p> <p>1 Mr. Cruz on March 14, 2016 at 2:00 a.m.?</p> <p>2 A. On March 14 at 2:00 a.m., this is</p> <p>3 Page 238, it's whatever my charting says. So, he</p> <p>4 was sitting in the bed agitated.</p> <p>5 Q. And then you see there's a drop-down about</p> <p>6 your observation note?</p> <p>7 A. Okay.</p> <p>8 Q. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. So, for one of them, behavior, where it</p> <p>11 says T-11, do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Did that reflect that on March 14, 2016 at</p> <p>14 2:00 a.m. he was aggressive, agitated, disruptive,</p> <p>15 explosive, inappropriate, and uncooperative?</p> <p>16 A. Yes.</p> <p>17 Q. Is that consistent with your recollection</p> <p>18 that he was psychotic?</p> <p>19 A. Yes.</p> <p>20 Q. So, under your observation note, there's a</p> <p>21 link to T-173 that says code BRT called, see</p> <p>22 special comments note; do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. That's something you entered into the</p>

<p style="text-align: right;">Page 13</p> <p>1 medical chart on March 14, 2016 at 2:00 a.m.?</p> <p>2 A. Yes.</p> <p>3 Q. What's a BRT?</p> <p>4 A. It's a Behavioral Response Team.</p> <p>5 Q. And so that's a code that can be called at</p> <p>6 Hinsdale Hospital?</p> <p>7 A. Yes.</p> <p>8 Q. What does it mean?</p> <p>9 A. When a nurse will call a code Behavioral</p> <p>10 Response Team, we call it overhead for assistance</p> <p>11 to come to a situation. So, a nurse from the</p> <p>12 psychiatric department will come, generally</p> <p>13 speaking, and security will also attend, the house</p> <p>14 director, and then, one of the residents from the</p> <p>15 medical team would respond, also.</p> <p>16 Q. Can you tell from your records who</p> <p>17 responded to the BRT code?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you know the names of the psychiatric</p> <p>20 nurses who may respond to a BRT code?</p> <p>21 A. I do not recall.</p> <p>22 Q. I'm saying this in general. So, the</p> <p>23 medical records you've looked at, you've I'm sure</p> <p>24 seen Tiago Salte's name, right?</p>	<p style="text-align: right;">Page 15</p> <p>1 entries that appear on Pages 152 and 153 of 294?</p> <p>2 A. Yes.</p> <p>3 Q. Can you tell me what you wrote at</p> <p>4 6:31 a.m. on March 14, 2016?</p> <p>5 A. On March 14, 2016 at 6:31, I wrote code</p> <p>6 BRT, code BRT was called again, patient jumped to</p> <p>7 side of bed --</p> <p>8 Q. Why don't I read it and make sure I read</p> <p>9 it okay, okay?</p> <p>10 A. Okay.</p> <p>11 MR. RAGEN: I mean I know the question is</p> <p>12 pending, but you don't care, do you, Tom?</p> <p>13 MR. TOMASIK: No. That's fine. Go ahead.</p> <p>14 BY MR. RAGEN:</p> <p>15 Q. So, it appears from this medical record</p> <p>16 found on Page 152 of 294 on March 14, 2016 at</p> <p>17 6:31 a.m. you entered into the record that a code</p> <p>18 BRT called again, patient jumped to side of bed</p> <p>19 while still handcuffed trying to get hand out of</p> <p>20 handcuff, two police officers went into room, were</p> <p>21 able to get patient back into bed and handcuffed</p> <p>22 his other hand to the bed, is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. That's something you entered into the</p>
<p style="text-align: right;">Page 14</p> <p>1 A. Yes.</p> <p>2 Q. And Tiago Salte is the nurse on the</p> <p>3 general floor?</p> <p>4 A. I don't remember.</p> <p>5 Q. Do you know who Tiago Salte is?</p> <p>6 A. I don't know who that is.</p> <p>7 Q. Do you know who Aiste Barkaiskaite is?</p> <p>8 A. Yes.</p> <p>9 Q. Who is that?</p> <p>10 A. She is a nurse that worked with me on the</p> <p>11 second floor.</p> <p>12 Q. So, Tiago Salte's name may not be a</p> <p>13 psychiatric nurse, is that fair?</p> <p>14 A. That's fair.</p> <p>15 Q. Anyway, just for the record, the last</p> <p>16 number of questions that corresponds to entries you</p> <p>17 made in the chart on Page 238 of 294, is that</p> <p>18 correct?</p> <p>19 A. Can you repeat the question?</p> <p>20 Q. Yes. This is more for the record, but</p> <p>21 when I asked you about your entry in the chart,</p> <p>22 those entries were found on Page 238 of 294?</p> <p>23 A. Yes.</p> <p>24 Q. Can you go to Page 152? Did you make</p>	<p style="text-align: right;">Page 16</p> <p>1 medical record, like I said, March 14, 6:31 a.m.?</p> <p>2 A. Yes.</p> <p>3 Q. That would have been based on what you</p> <p>4 observed in Mr. Cruz around that same time?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know who made the decision to --</p> <p>7 well, based on this note, two of his hands were</p> <p>8 handcuffed to the bed, correct?</p> <p>9 A. Based on my charting, I said trying to get</p> <p>10 hand, I used a single word, so it must have been</p> <p>11 just one hand.</p> <p>12 Q. And then at the end of it, it says were</p> <p>13 able to get patient back into bed and handcuffed</p> <p>14 his other hand to the bed?</p> <p>15 A. So, then at that time, yes, so then he</p> <p>16 must have had two hands.</p> <p>17 Q. And so when a patient is handcuffed to the</p> <p>18 bed, where on the bed are they handcuffed to?</p> <p>19 A. I don't -- that's not -- you have to ask</p> <p>20 the police officers. Based on my observation, it</p> <p>21 was to the side rail, but I don't know which one, I</p> <p>22 don't remember.</p> <p>23 Q. Well, are there two side rails on a</p> <p>24 standard bed on the general medical floor of</p>

Page 17

1 Hinsdale Hospital?

2 A. There's generally four side rails, two at
3 the top, two at the feet.

4 Q. Would this note one way or the other,
5 would that reflect that he was handcuffed
6 bilaterally to the rails that are on the upper side
7 of the bed?

8 A. I don't remember.

9 Q. Can you say whether this note says that
10 one way or the other?

11 A. I can't infer that from my note.

12 Q. And then on March 14, 2016 at 7:00 a.m.,
13 you make a note that says when resident arrived,
14 received orders for four-point restraints, called
15 attending, explained that patient is more of a
16 safety risk for staff and others and that he needs
17 to be released to pre-leased custody, he agreed
18 with that, he agreed with discharge orders; do you
19 see that?

20 A. Yes.

21 Q. Is that what you entered into the medical
22 record on March 14, 2016 at 7:00 a.m.?

23 A. Yes.

24 Q. Do you know who the resident was?

Page 18

1 A. I don't remember.

2 Q. Is there anywhere in the medical record
3 that you could look at to determine who was the
4 resident?

5 A. You could look at notes from the
6 physicians at that time, but I don't remember and I
7 don't have the information in front of me.

8 Q. When you say you could look at notes,
9 would it be possible that the resident, him or
10 herself, wrote a corresponding note?

11 A. I don't know if they did.

12 Q. Because you don't have that documentation
13 in front of you, is that fair?

14 A. Correct. Yes.

15 Q. But if we wanted to find out who the
16 resident was, you said we could look at the notes,
17 right?

18 A. Correct.

19 Q. Would that be because maybe a resident
20 would write a note?

21 A. Correct.

22 Q. This note says you called the attending?

23 A. Yes.

24 Q. Do you know who the attending was?

Page 19

1 A. I didn't -- I don't remember. It's not
2 charted. I didn't chart it in this note
3 specifically.

4 Q. When you said you received the orders for
5 four-point restraints, do you know who gave those
6 orders?

7 A. I don't know off the top of my head, no.

8 Q. But would it have to have come from a
9 physician?

10 A. Yes.

11 Q. Because only a physician could make an
12 order to place a patient in four-point restraints,
13 is that fair?

14 A. Correct.

15 Q. When you received the orders for
16 four-point restraints, do you know what Mr. Cruz
17 was doing that would call for him to be placed in
18 the four-point restraints?

19 A. Well, based on my charting right here that
20 he was trying to jump out of bed and trying to get
21 his hand out of the handcuff, and I also wrote that
22 he was more of a safety risk to staff and others;
23 therefore, that's why he must have received an
24 order for four-point restraints.

Page 20

1 Q. I see that you indicate that he's more of
2 a safety risk for staff and others. Is there
3 anything else to explain what behavior he was doing
4 that was a risk to staff and others?

5 A. Based on my charting, that's what I -- why
6 I would say that because he was trying to get out
7 of bed.

8 Q. Was he placed in the four-point
9 restraints, if you can recall?

10 A. I don't recall.

11 Q. So, when you were caring for this patient,
12 were you the primary nurse caring for Mr. Cruz when
13 he was on the general medical floor at Hinsdale
14 Hospital?

15 A. Like I said, yes.

16 Q. I saw a lot of the care you provided. I
17 just didn't see anything in the documentation that
18 showed that you assessed his vitals. Did you see
19 anything that showed you assessed his vitals?

20 A. I don't see anything, but we have a care
21 tech that would -- on that floor, a care tech would
22 have taken the vitals for this patient.

23 Q. And so it looks like there was Regina
24 Gilchrist, CRT. You may not have that page. Look

<p style="text-align: right;">Page 21</p> <p>1 at Page 177 of 294. I don't know if you have that.</p> <p>2 You might not have it. Give me a second, I'll try</p> <p>3 and pull it up.</p> <p>4 MR. TOMASIK: He's going to put it up on the</p> <p>5 screen for us.</p> <p>6 THE WITNESS: Okay.</p> <p>7 BY MR. RAGEN:</p> <p>8 Q. Okay. Can you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Why we came to this is because I asked if</p> <p>11 you showed in your records if you measured this</p> <p>12 guy's vitals, and you indicated that you didn't,</p> <p>13 but the CRT may have, correct?</p> <p>14 A. CNA is the nurse assistant -- certified</p> <p>15 nurse assistant which would be the entry below.</p> <p>16 Q. My point is these are people -- and if I</p> <p>17 remember correctly, your shift would have began on</p> <p>18 March 13, 6:45 p.m. extended to March 14 on or</p> <p>19 around 7:15 a.m., right?</p> <p>20 A. Yes.</p> <p>21 Q. So, if you look at the first one on</p> <p>22 March 14, 2016 by Regina Gilchrist, that person</p> <p>23 provided some information about vitals, correct?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 23</p> <p>1 A. Can you repeat the question?</p> <p>2 Q. Yes. Could you tell me what times based</p> <p>3 on your medical records you found Mr. Cruz to be</p> <p>4 assessed as a plus four as combative in the</p> <p>5 Richmond Agitation-Sedation Scale?</p> <p>6 A. Yes. You can see at these times that</p> <p>7 that's what I charted plus four.</p> <p>8 Q. I can read it, but this is for the court</p> <p>9 reporter to take down. Can you tell me the times</p> <p>10 that you assessed Mr. Cruz as a plus four on that</p> <p>11 scale?</p> <p>12 A. I assessed him at 06:19, 01:55, and the</p> <p>13 01:36.</p> <p>14 Q. And so the 06:19 and 01:55, those times</p> <p>15 were all the morning of March 14?</p> <p>16 A. Yes.</p> <p>17 MR. RAGEN: Those are all the questions I have.</p> <p>18 Thanks.</p> <p>19 MR. CATANIA: Just very briefly. I represent</p> <p>20 the Sheriff of Cook County. My name is Frank</p> <p>21 Catania.</p> <p>22 EXAMINATION</p> <p>23 BY MR. CATANIA:</p> <p>24 Q. When you were charting your assessment of</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. During the time that you were caring for</p> <p>2 Mr. Cruz, right?</p> <p>3 A. Yes, but CRT is a respiratory therapist.</p> <p>4 Q. And then the CNA is Jurate Martkevicius,</p> <p>5 is that correct?</p> <p>6 A. Yes.</p> <p>7 MR. RAGEN: Okay, I'll stop sharing the screen.</p> <p>8 I'm just looking for one more line of questioning.</p> <p>9 I can't find my notes on it. So we're real close</p> <p>10 to being done.</p> <p>11 BY MR. RAGEN:</p> <p>12 Q. Do you have Page 196 of 294 there?</p> <p>13 A. Yes.</p> <p>14 Q. There's some notes you entered in the</p> <p>15 medical record concerning a Richmond</p> <p>16 Agitation-Sedation Scale?</p> <p>17 A. Yes.</p> <p>18 Q. What is that?</p> <p>19 A. That's our sedation and agitation scale</p> <p>20 that we assess every shift or as-needed, and it</p> <p>21 ranges from negative five, unresponsive, to a plus</p> <p>22 four if a patient is extremely combative.</p> <p>23 Q. At this time, can you tell me at what</p> <p>24 times you thought that Mr. Cruz was a plus four?</p>	<p style="text-align: right;">Page 24</p> <p>1 the sedation risk assessment that you were doing</p> <p>2 and you found plus four meaning that he was</p> <p>3 combative, did you consider that to be something</p> <p>4 that required you to get help?</p> <p>5 A. Yes.</p> <p>6 Q. That is why you called the code BRT?</p> <p>7 A. Yes.</p> <p>8 Q. In terms of help, you were looking for</p> <p>9 people to physically help you, assist you with a</p> <p>10 combative patient, right?</p> <p>11 A. Yes.</p> <p>12 Q. There were police present during that?</p> <p>13 A. Yes.</p> <p>14 Q. Did you consider that the behavior was an</p> <p>15 issue for police intervention?</p> <p>16 A. What the police do is on the -- we</p> <p>17 don't -- I can't tell the police what to do, I</p> <p>18 don't know their protocols. But based on the</p> <p>19 hospital, I would follow our policies and</p> <p>20 procedures which would be to call a code BRT.</p> <p>21 Q. In one of your notes, you described the</p> <p>22 police officer as placing him back on the bed and</p> <p>23 then applying a second handcuff; do you recall</p> <p>24 that?</p>

<p style="text-align: right;">Page 25</p> <p>1 A. Yes.</p> <p>2 Q. That was police intervention, is that</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. That's completely distinct from medical</p> <p>6 interventions, is that right?</p> <p>7 A. Yes.</p> <p>8 MR. CATANIA: I have no further questions.</p> <p>9 Thank you.</p> <p>10 EXAMINATION</p> <p>11 BY MR. FLAXMAN:</p> <p>12 Q. Good afternoon, I guess.</p> <p>13 A. Good afternoon.</p> <p>14 Q. Do you have Page 96 of your records in</p> <p>15 front of you?</p> <p>16 A. Yes.</p> <p>17 Q. Did you make any of those notations?</p> <p>18 A. I did, yes.</p> <p>19 Q. Could you read to us the beginning of what</p> <p>20 you wrote?</p> <p>21 A. So, this entry is part of our plan of care</p> <p>22 for nursing on a discharge power plan. I wrote</p> <p>23 progressing as it related to knowledge of discharge</p> <p>24 instructions.</p>	<p style="text-align: right;">Page 27</p> <p>1 option that's in the computer.</p> <p>2 Q. What does it mean that he was progressing?</p> <p>3 A. So, just progressing towards discharge.</p> <p>4 Q. Do you have Page 94?</p> <p>5 A. Yes.</p> <p>6 Q. Is there any reference to you on Page 94?</p> <p>7 A. Yes.</p> <p>8 Q. Is that at the bottom?</p> <p>9 A. Yes.</p> <p>10 Q. Could you tell us what that reference is?</p> <p>11 A. This is to an order for Geodon.</p> <p>12 Q. Is that a medication?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know what kind of medication it is?</p> <p>15 A. An antipsychotic.</p> <p>16 Q. Did you get a verbal order to administer</p> <p>17 that?</p> <p>18 A. Yes.</p> <p>19 Q. Could you tell us from whom you got that</p> <p>20 verbal order?</p> <p>21 A. From Dr. Zoheb Osman.</p> <p>22 Q. Is that O-s-m-a-n?</p> <p>23 A. Yes.</p> <p>24 Q. And his first name is Z-o-h-e-b?</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. So, that's at the bottom where -- and then</p> <p>2 you wrote charted at 3-14, 2016 2:56 CDT?</p> <p>3 A. Yes.</p> <p>4 Q. Does that mean 2:56 a.m.?</p> <p>5 A. Yes.</p> <p>6 Q. What does it mean that the outcome was</p> <p>7 knowledge of discharge instructions?</p> <p>8 A. So, under this care plan, there's</p> <p>9 different entries; there's discharge planning which</p> <p>10 is knowledge of discharge instructions, knowledge</p> <p>11 of medication management which goes onto the next</p> <p>12 page, 197, the participation and care planning.</p> <p>13 This is the same outcomes that are in every power</p> <p>14 plan for discharge power plan for every patient.</p> <p>15 Q. Did you give Mr. Cruz discharge</p> <p>16 instructions?</p> <p>17 A. No. So, when a patient is admitted,</p> <p>18 everyone has a discharge power plan already in</p> <p>19 place at the time of admission. So, on every</p> <p>20 shift, we all chart how they're progressing towards</p> <p>21 discharge.</p> <p>22 Q. Did you write anything at 2:56 a.m. about</p> <p>23 how Mr. Cruz was progressing?</p> <p>24 A. I wrote progressing because that's the</p>	<p style="text-align: right;">Page 28</p> <p>1 A. Yes.</p> <p>2 Q. Was that at about 1:45 a.m. on March 14,</p> <p>3 2016?</p> <p>4 A. Yes.</p> <p>5 Q. Do you recall how that medication was</p> <p>6 administered; was it IV, was it a pill, was it an</p> <p>7 injection?</p> <p>8 A. It was intramuscular, IM.</p> <p>9 Q. What does intramuscular mean?</p> <p>10 A. In the muscle.</p> <p>11 Q. Is that an injection?</p> <p>12 A. Yes.</p> <p>13 Q. Do you have Page 115 in front of you?</p> <p>14 A. Yes.</p> <p>15 Q. Did you make any entries or is there any</p> <p>16 reference to you on Page 115?</p> <p>17 A. Yes.</p> <p>18 Q. Where is the first reference to you?</p> <p>19 A. Under interventions, safety precautions in</p> <p>20 place, I chose these following options. Would you</p> <p>21 like me to read them?</p> <p>22 Q. Did you make that entry which ends with</p> <p>23 Weger, R.N. comma, Meghan L; are those your</p> <p>24 entries?</p>

<p style="text-align: right;">Page 29</p> <p>1 A. Yes.</p> <p>2 Q. Could you read it slowly, please?</p> <p>3 A. Intervention, safety precautions in place.</p> <p>4 Results, absence of signs, symptoms injury at</p> <p>5 present, bed crib in low position, bed wheels</p> <p>6 locked, close to nurse station, eliminate clutter</p> <p>7 in room pathways, ID band check, instructed patient</p> <p>8 visitor to call for help to get out of bed,</p> <p>9 night-light, non-footwear -- absence of signs,</p> <p>10 symptoms injury at present, bed crib in low</p> <p>11 position, bed wheels locked, close to nurse</p> <p>12 station, eliminate clutter in room pathways, ID</p> <p>13 band check, instructed patient visitor to call for</p> <p>14 help to get out of bed, night-light non-slip</p> <p>15 footwear, 02 Ambu bag, resuscitation equipment at</p> <p>16 bedside, oriented to room, bathroom location, and</p> <p>17 use of call bell, upper half length side rails up.</p> <p>18 Q. What did you mean when you wrote oriented</p> <p>19 to room, bathroom location, and use of call bell?</p> <p>20 A. That I oriented the patient to his room,</p> <p>21 where the bathroom was, and the use of his call</p> <p>22 bell.</p> <p>23 Q. Was this a conversation you have had with</p> <p>24 the patient?</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Why?</p> <p>2 A. Based on his --</p> <p>3 Q. I'm sorry, I paused. It's my fault.</p> <p>4 Could you tell us why you gave him that medication?</p> <p>5 A. Based on his Richmond Agitation-Sedation</p> <p>6 Scale of a plus four combative.</p> <p>7 Q. Could you tell us what plus four combative</p> <p>8 means?</p> <p>9 A. It means the patient is combative, he's</p> <p>10 violent, and he's in immediate danger to staff.</p> <p>11 Q. When he was combative plus four, was he</p> <p>12 was in restraints?</p> <p>13 A. I don't know.</p> <p>14 Q. Was he handcuffed to the bed?</p> <p>15 A. I don't know at this exact time.</p> <p>16 Q. Is there anything that you could look at</p> <p>17 that would refresh your recollection?</p> <p>18 A. I would have to review the chart to know</p> <p>19 the exact time.</p> <p>20 Q. If you could go to the next page,</p> <p>21 Page 120, did you administer other medication --</p> <p>22 A. Yes.</p> <p>23 Q. -- shown on this page?</p> <p>24 Could you tell us what you administered?</p>
<p style="text-align: right;">Page 30</p> <p>1 A. Yes.</p> <p>2 Q. Did he act like he understood what you</p> <p>3 were telling him?</p> <p>4 A. I don't remember.</p> <p>5 Q. Did you make these entries at about</p> <p>6 10:01 p.m. on March 13 of 2016?</p> <p>7 A. Yes.</p> <p>8 Q. If we go to Page 119, does this refer to</p> <p>9 medications that you administered to Mr. Cruz?</p> <p>10 A. Yes.</p> <p>11 Q. Which medications did you administer to</p> <p>12 him that are shown on this page?</p> <p>13 A. I administered Haldol at 01:39 on</p> <p>14 March 14, 2016 and administered the same medication</p> <p>15 again, Haldol, on March 14, 2016 at 3:43 a.m.</p> <p>16 Q. Is Haldol an antipsychotic medication?</p> <p>17 A. Yes.</p> <p>18 Q. When you administered it, was that verbal</p> <p>19 or was that at the direction of a physician?</p> <p>20 A. It was a PRN order which means as-needed</p> <p>21 which was already in this chart.</p> <p>22 Q. Did you make a determination that it was</p> <p>23 needed to give Mr. Cruz Haldol?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 32</p> <p>1 A. I administered Haldol on March 14, 2016 at</p> <p>2 6:21 a.m.</p> <p>3 Q. Was that also a PRN decision?</p> <p>4 A. It was a PRN medication, and I gave it</p> <p>5 based on his Richmond Agitation-Sedation Scale, the</p> <p>6 plus four.</p> <p>7 Q. Is there any other medication that you</p> <p>8 administered that's shown on this page?</p> <p>9 A. No.</p> <p>10 Q. Go to Page 123. Does this show any</p> <p>11 medications that you administered?</p> <p>12 A. Yes.</p> <p>13 Q. Could you tell us what they are or is?</p> <p>14 A. I administered Risperdal, it's an</p> <p>15 antipsychotic.</p> <p>16 Q. When did you administer that?</p> <p>17 A. On March 13, 2016 at 20:37.</p> <p>18 Q. Is that 8:37 p.m.?</p> <p>19 A. Yes.</p> <p>20 Q. Why did you administer that medication?</p> <p>21 A. I would have administered the -- let me</p> <p>22 look at the -- this was -- I don't know for</p> <p>23 certain, but this must have been an order</p> <p>24 medication, a scheduled medication to be given to</p>

<p style="text-align: right;">Page 33</p> <p>1 the patient.</p> <p>2 Q. Anything else on this page that relates to</p> <p>3 work that you did?</p> <p>4 A. No.</p> <p>5 Q. Let's go back to 121. Do you know a</p> <p>6 physician named Dr. Nishad Nadkarni?</p> <p>7 A. I don't recall.</p> <p>8 Q. Have you ever come across Dr. Nadkarni?</p> <p>9 A. I don't recall.</p> <p>10 Q. Do you see his name on Page 121?</p> <p>11 A. I do.</p> <p>12 Q. Did he give you any instructions or orders</p> <p>13 on March 12 of 2016?</p> <p>14 A. No.</p> <p>15 Q. On Page 152, you wrote I think more of the</p> <p>16 safety risk on your entry for 7:00 a.m.?</p> <p>17 A. Yes.</p> <p>18 Q. What did you mean by that?</p> <p>19 A. What did I mean by what?</p> <p>20 Q. What did you mean when you wrote he's more</p> <p>21 of a safety risk; what were you trying to convey</p> <p>22 with that phrase?</p> <p>23 A. That he was a danger to staff and to -- a</p> <p>24 danger to other patients in the hospital, to even</p>	<p style="text-align: right;">Page 35</p> <p>1 talked about administering Geodon? Oh, no, it was</p> <p>2 the one before on Page 94, I think.</p> <p>3 Do you remember being asked whether or not</p> <p>4 you administered Geodon intramuscularly on or</p> <p>5 around 1:45 a.m. on March 14?</p> <p>6 A. I don't see that. Okay. Yes, I</p> <p>7 administered it at 1:46 a.m. -- 1:48, it's hard to</p> <p>8 read it on here.</p> <p>9 Q. Geodon is an antipsychotic, we covered</p> <p>10 that, right?</p> <p>11 A. Yes.</p> <p>12 Q. What affect do you expect it to have on a</p> <p>13 patient if it's going to have any affect?</p> <p>14 A. For the patient to be calm.</p> <p>15 Q. Can you say with whether or not Geodon had</p> <p>16 the affect you wanted on this patient?</p> <p>17 A. I have to review my charting. I don't</p> <p>18 recall.</p> <p>19 Q. Then one little thing to clear up on</p> <p>20 Page 115. I thought I heard -- we talked about the</p> <p>21 safety precautions in place, that Plaintiff care</p> <p>22 that you guys covered; remember that?</p> <p>23 A. Yes.</p> <p>24 Q. I thought I heard the record say that that</p>
<p style="text-align: right;">Page 34</p> <p>1 himself. Based on my charting, I said that he was</p> <p>2 trying to get out of his handcuff and needed to be</p> <p>3 put -- asked for restraints. And I was scared, I</p> <p>4 remember being very scared.</p> <p>5 Q. Could you explain to us what restraints</p> <p>6 are?</p> <p>7 A. There's different types of restraints. A</p> <p>8 four-point would mean both his wrists and ankles</p> <p>9 would be restrained with a lock-and-key type of</p> <p>10 restraint or there's soft wrist restraints that we</p> <p>11 use at the wrist that tie to the bed.</p> <p>12 Q. When you wrote that he was more of a</p> <p>13 safety risk, was he in restraints at that time?</p> <p>14 A. No. It does not -- I did not write that</p> <p>15 in my charting.</p> <p>16 MR. FLAXMAN: I have nothing further. Thank</p> <p>17 you.</p> <p>18 MR. TOMASIK: Bill, anything based on that?</p> <p>19 MR. RAGEN: Yes, just a couple.</p> <p>20 FURTHER EXAMINATION</p> <p>21 BY MR. RAGEN:</p> <p>22 Q. Going back to 95 of 294, you talked about</p> <p>23 how you administered -- wait. Is that the one?</p> <p>24 It's a different time. Was this the one where we</p>	<p style="text-align: right;">Page 36</p> <p>1 was entered at 10:01 p.m. and maybe I misheard it,</p> <p>2 but I'll just try to reestablish it.</p> <p>3 MR. TOMASIK: No. You're right.</p> <p>4 MR. RAGEN: What?</p> <p>5 MR. TOMASIK: Keep going.</p> <p>6 MR. RAGEN: I'm not crazy, right?</p> <p>7 MR. TOMASIK: You're not crazy.</p> <p>8 BY MR. RAGEN:</p> <p>9 Q. It's probably not a big deal anyway, but</p> <p>10 just on Page 115 of 294, you made one entry to the</p> <p>11 medical record on that page, correct?</p> <p>12 A. Correct.</p> <p>13 Q. That's the one you went over with</p> <p>14 Mr. Flaxman?</p> <p>15 A. Correct, at 20:01 on March 13, 2016.</p> <p>16 Q. So, that would be 8:01 p.m., correct?</p> <p>17 A. Yes.</p> <p>18 MR. RAGEN: That's all I have.</p> <p>19 MR. TOMASIK: Anything else?</p> <p>20 FURTHER EXAMINATION</p> <p>21 BY MR. CATANIA:</p> <p>22 Q. Just a point of clarification. Geodon is</p> <p>23 Ziprasidone, is that right?</p> <p>24 A. Yes.</p>

<p style="text-align: right;">Page 37</p> <p>1 MR. CATANIA: Okay. Thank you. Nothing 2 further. 3 MR. FLAXMAN: Nothing. 4 MR. TOMASIK: We'll waive signature. 5 (Whereupon, the deposition 6 concluded at 2:48 o'clock p.m.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 39</p> <p>1 I further certify that the taking of this 2 deposition was pursuant to notice and that there 3 were present at the deposition the attorneys 4 hereinbefore mentioned. 5 I further certify that I am not counsel 6 for nor in any way related to the parties to this 7 suit, nor am I in any way interested in the outcome 8 thereof. 9 10 IN TESTIMONY WHEREOF: I have hereunto set 11 my hand this 24th day of November, 2020. 12 13 14 15 16 CERTIFIED SHORTHAND REPORTER 17 LICENSE NO. 084-003785 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 38</p> <p>1 STATE OF ILLINOIS) 2) SS: 3 COUNTY OF C O O K) 4 I, CHRISTINE M. PINA, do hereby certify 5 that heretofore, to-wit, on November 2, 2020 6 personally appeared before me remotely via Zoom in 7 Illinois, MEGHAN WEGER, in a cause now pending and 8 undetermined in the United States District Court 9 For The Northern District of Illinois, wherein 10 LETICIA VARGAS is the Plaintiff, and SHERIFF OF 11 COOK COUNTY, ET AL., are the Defendants. 12 I further certify that the said MEGHAN 13 WEGER was first duly sworn to testify the truth, 14 the whole truth and nothing but the truth in the 15 cause aforesaid; that the testimony then given by 16 said witness was reported stenographically by me in 17 the presence of the said witness, and afterwards 18 reduced to typewriting by Computer-Aided 19 Transcription, and the foregoing is a true and 20 correct transcript of the testimony so given by 21 said witness as aforesaid. 22 I further certify that the signature to 23 the foregoing deposition was waived by counsel for 24 the respective parties.</p>	

Transcript Word Index

[& - agitated]

&	177	294	8
& 3:9	21:1	8:23 9:3 11:17 14:17,22	8:01 36:16
0	18 1:7	15:1,16 21:1 22:12 34:22 36:10	8:37 32:18
01:36 23:13	1865 1:7	3	9
01:39 30:13	196 22:12	3:43 30:15	94 27:4,6 35:2
01:55 23:12,14	197 26:12	300 2:12 8:20	95 34:22
02 29:15	2	312 2:7,14 3:6	96 25:14
06:19 23:12,14	2 38:5	3-14 26:2	a
084-003785 1:24 39:16	2:00 1:21 12:1,2,14 13:1	34 4:10	a.m. 11:10,11 12:1,2,14 13:1 15:4,17 16:1 17:12,22 21:19 26:4,22 28:2 30:15 32:2 33:16 35:5,7
1	2:48 1:22 37:6	36 4:11	able 15:21 16:13
1:45 28:2 35:5	2:56 26:2,4,22	4	absence 29:4,9
1:46 35:7	20 7:10	40 8:23	acid 11:1
1:48 35:7	20:01 36:15	4200 3:11	act 30:2
10 1:20	20:37 32:17	427-3200 2:7	additional 7:17
10:01 30:6 36:1	200 2:5	5	administer 27:16 30:11 31:21 32:16,20
11 12:11	2008 7:10	50 3:4	administered 5:3 28:6 30:9,13,14,18 31:24 32:1,8,11,14,21 34:23 35:4,7
115 28:13,16 35:20 36:10	201 2:5	6	administering 35:1
119 30:8	2014 6:21 7:13,14	6 4:7	administrator 1:5
12 33:13	2016 6:22 7:1,5,18 12:1,13 13:1 15:4,5,16 17:12,22 21:22 26:2 28:3 30:6,14,15 32:1 32:17 33:13 36:15	6:21 32:2	admission 26:19
120 31:21	2020 1:20 38:5 39:11	6:31 15:4,5,17 16:1	admitted 10:22,24 26:17
121 33:5,10	2020-14 5:5	6:45 11:9 21:18	adventist 7:4,5,8
123 32:10	23 4:8	603-6539 2:14	affect 35:12,13,16
13 11:4 21:18 30:6 32:17 36:15	237 11:13,15,16,17	603-6572 3:6	aforesaid 38:15,21
14 11:5 12:1,2,13 13:1 15:4,5 15:16 16:1 17:12,22 21:18 21:22 23:15 28:2 30:14,15 32:1 35:5	238 11:13 12:3 14:17,22	60555 3:12	afternoon 25:12,13
152 14:24 15:1,16 33:15	24th 39:11	60602 2:13 3:5	aggressive 12:14
153 15:1	25 4:9 9:7	60604 2:6	agitated 12:4,14
173 12:21	260-5600 3:13	630 3:13	
	2760 3:4	7	
		7:00 17:12,22 33:16	
		7:15 11:10,11 21:19	

[agitation - comma]

agitation 22:16,19 23:5 31:5 32:5	assessed 20:18,19 23:4,10,12	bedside 29:16	center 2:12
agree 5:12	assessment 23:24 24:1	began 21:17	certain 32:23
agreed 17:17,18	assist 24:9	beginning 25:19	certified 1:17 21:14 39:15
agreement 5:5	assistance 13:10	behalf 2:9,16 3:8,15 5:11	certify 38:4,12,22 39:1,5
ahead 15:13	assistant 3:2 21:14,15	behavior 12:10 20:3 24:14	chart 8:8 9:22 13:1 14:17,21 19:2 26:20 30:21 31:18
aided 38:18	associates 6:20	behavioral 13:4,9	charted 19:2 23:7 26:2
aiste 14:7	assume 6:9	believe 10:24	charting 12:3 16:9 19:19 20:5 23:24 34:1,15 35:17
al 38:11	attend 13:13	bell 29:17,19,22	chatman 1:9 2:17
alabi 1:8 2:16	attending 17:15 18:22,24	big 36:9	check 29:7,13
allegedly 10:22	attorney 3:2 8:11,13	bilaterally 17:6	cherri 1:10
ambu 29:15	attorneys 39:3	bill 34:18	chicago 1:19 2:6,13 3:5
angel 1:6	attorney's 2:10	bottom 26:1 27:8	chose 28:20
anita 1:9	augustus 1:8 2:16	briefly 23:19	christine 1:17,23 38:4
ankles 34:8	avenue 2:5	brt 12:21 13:3,17,20 15:6,6,18 24:6,20	christy 5:22
answer 6:8 10:12	avis 1:8	c	civil 1:14
antipsychotic 27:15 30:16 32:15 35:9	b	calhoun 1:8	clarification 36:22
anyway 14:15 36:9	b.s.n. 7:18	call 13:9,10 19:17 24:20 29:8 29:13,17,19,21	clear 35:19
apparently 10:23	bachelor 6:24	called 1:13 12:21 13:5 15:6,18 17:14 18:22 24:6	close 22:9 29:6,11
appear 9:12 15:1	bachelors 6:21,23	calm 35:14	clutter 29:6,12
appearances 2:1 3:1	back 15:21 16:13 24:22 33:5 34:22	cantera 3:11	cmv 10:14,15
appeared 38:6	bag 29:15	care 8:1 9:18,20 15:12 20:16,20 20:21 25:21 26:8,12 35:21	cmvlaw.com 3:14
appears 11:3 15:15	band 29:7,13	caring 20:11,12 22:1	cna 21:14 22:4
applied 6:20	barkaiskaite 14:7	case 1:7	code 12:21 13:5,9,17,20 15:5,6 15:17 24:6,20
applying 24:23	based 16:3,7,9,20 19:19 20:5 23:2 24:18 31:2,5 32:5 34:1,18	catania 3:3 4:8,11 5:10 23:19,21,23 25:8 36:21 37:1	college 6:19
arrest 10:23	bathroom 29:16,19,21	cause 38:7,15	combative 22:22 23:4 24:3,10 31:6,7,9 31:11
arrived 17:13	bed 12:4 15:7,18,21,22 16:8,13 16:14,18,18,24 17:7 19:20 20:7 24:22 29:5,5,8,10,11 29:14 31:14 34:11	cdt 26:2	comma 28:23
asked 14:21 21:10 34:3 35:3			
assess 22:20			

[comments - find]

comments 12:22	crt 20:24 21:13 22:3	director 13:14	entries 14:16,22 15:1 26:9 28:15
completely 25:5	cruz 1:6 8:2 10:20 12:1 16:4	discharge 17:18 25:22,23 26:7,9,10	28:24 30:5
computer 27:1 38:18	19:16 20:12 22:2,24 23:3	26:14,15,18,21 27:3	entry 14:21 21:15 25:21 28:22
concerning 22:15	23:10 26:15,23 30:9,23	discussed 8:12	33:16 36:10
concluded 1:22 37:6	csr 1:23	disruptive 12:14	equipment 29:15
consider 24:3,14	cunningham 3:9	distinct 25:5	estate 1:6
consistent 12:17	currently 7:3	district 1:1,2,15 38:8,9	et 38:11
continued 3:1	custody 17:17	division 1:3	evening 11:4
conversation 29:23	cv 1:7	doctor's 10:7	event 8:11
conversationally 5:19	d	documentation 18:12 20:17	exact 31:15,19
convey 33:21	daley 2:12	documents 8:18 9:14	examination 1:14 4:4 6:14 23:22 25:10
cook 1:7,8,19 2:10 3:8 5:8,9,10	danger 31:10 33:23,24	doing 19:17 20:3 24:1	34:20 36:20
23:20 38:11	day 39:11	dr 1:11 27:21 33:6,8	examined 6:12
cookcountyil.gov 2:15 3:7	deal 36:9	drive 3:11	example 9:17
correct 7:1,2 9:5,6 11:12 14:18	decision 16:6 32:3	drop 12:5	executive 5:4
15:22,23 16:8 18:14,18,21	defendant 5:8	duly 5:14 6:12 38:13	exhibits 4:22
19:14 21:13,23 22:5 36:11	defendants 1:13 38:11	e	expect 35:12
36:12,15,16 38:20	degree 7:18	eastern 1:3	explain 20:3 34:5
correctly 21:17	department 13:12	elevated 11:1	explained 17:15
corresponding 18:10	deponent 3:15	eliminate 29:6,12	explosive 12:15
corresponds 14:16	deposition 1:13,22 5:1 8:7 10:10 11:22	elizabeth 1:10 2:17	extended 21:18
counsel 38:23 39:5	37:5 38:23 39:2,3	emar 10:7	extent 10:8
county 1:7,8,19 2:10 3:8 5:8,9,10	depositions 1:16	emars 10:8	extremely 22:22
23:20 38:3,11	described 24:21	employed 7:3,5	f
couple 5:18 7:23 34:19	determination 30:22	employees 5:9	fair 6:9 9:24 14:13,14 18:13
court 1:1 5:1,3,22 23:8 38:8	determine 18:3	ended 11:8	19:13
courts 1:15	diagne 2:4	ends 28:22	fault 31:3
covered 35:9,22	different 26:9 34:7,24	entered 12:24 15:17,24 17:21 22:14	feel 9:14
crazy 36:6,7	dimitri 2:4	36:1	feet 17:3
crib 29:5,10	direction 30:19		find 18:15 22:9

[fine - leased]

fine 15:13	given 32:24 38:15,20	hereunto 39:10	intramuscularly 35:4
finish 5:21	go 5:18 6:18 10:10 11:16 14:24 15:13 30:8 31:20 32:10 33:5	high 9:3	issue 24:15
first 6:12 7:10 21:21 27:24 28:18 38:13	goes 26:11	hinsdale 7:4,6,9,22 13:6 17:1 20:13	iv 28:6
five 22:21	going 5:20,22 11:5 21:4 34:22 35:13 36:5	hired 7:13	j
flaxman 2:2,3 4:9 5:7 25:11 34:16 36:14 37:3	good 25:12,13	hope 8:9	jaruwan 1:12 2:19
floor 7:12,21,24 8:4 14:3,11 16:24 20:13,21	governor 5:4	hospital 7:4,6,9,23 13:6 17:1 20:14 24:19 33:24	jason 1:11 2:18
follow 24:19	graduated 6:19,22 7:11	hour 1:20	johnson 1:9
following 28:20	ground 5:19	house 13:13	jump 19:20
follows 6:13	guess 25:12	huh 6:1	jumped 15:6,18
footwear 29:9,15	guys 35:22	i	jurate 22:4
foregoing 38:19,23	guy's 21:12	illinois 1:2,19,20 2:6,13 3:5,12 38:1,7,9	k
found 14:22 15:16 23:3 24:2	h	immediate 31:10	kanel 1:9 2:17
four 17:2,14 19:5,12,16,18,24 20:8 22:22,24 23:4,7,10 24:2 31:6,7,11 32:6 34:8	haldol 30:13,15,16,23 32:1	inappropriate 12:15	keep 36:5
francis 3:3	half 29:17	independent 10:19	kenlaw.com 2:8
francis.catania 3:7	hand 15:19,22 16:10,11,14 19:21 39:11	indicate 20:1	kenneth 2:2,3
frank 23:20	handcuff 15:20 19:21 24:23 34:2	indicated 21:12	key 34:9
front 8:21 18:7,13 25:15 28:13	handcuffed 15:19,21 16:8,13,17,18 17:5 31:14	individually 5:9	kind 27:14
further 4:10,11 25:8 34:16,20 36:20 37:2 38:12,22 39:1,5	hands 16:7,16	infer 17:11	knf 2:8
g	happened 8:3	information 18:7 21:23	know 5:20 8:21,24 9:4 10:1,11 13:19 14:5,6,7 15:11 16:6 16:21 17:24 18:11,24 19:5 19:7,16 21:1 24:18 27:14 31:13,15,18 32:22 33:5
general 8:3 10:3 13:22 14:3 16:24 20:13	hard 5:23 35:7	injection 28:7,11	knowledge 25:23 26:7,10,10
generally 13:12 17:2	head 19:7	injury 29:4,10	krzyzowski 1:10
gentleman 11:4	heard 35:20,24	instructed 29:7,13	l
geodon 27:11 35:1,4,9,15 36:22	helen 1:9 2:17	instructions 25:24 26:7,10,16 33:12	laboratory 9:19,24
gilchrist 20:24 21:22	help 24:4,8,9 29:8,14	interested 39:7	labs 10:6
give 21:2 26:15 30:23 33:12	hereinbefore 39:4	intervention 24:15 25:2 29:3	lactic 11:1
	heretofore 38:5	interventions 25:6 28:19	lassen 1:10 2:18
		intramuscular 28:8,9	leased 17:17

[length - pathways]

length 29:17	mean (cont.) 33:20 34:8	night 29:9,14	okay (cont.) 12:7 15:9,9,10 21:6,8 22:7
leticia 1:5 38:10	meaning 24:2	nishad 33:6	35:6 37:1
license 1:24 39:16	means 5:2 30:20 31:8,9	non 29:9,14	oncology 7:24
light 29:9,14	measured 21:11	northern 1:2 38:9	opposed 9:16
line 22:8	medical 7:24 8:3,4 10:13 13:1,15,23	notations 25:17	option 27:1
link 12:21	15:15 16:1,24 17:21 18:2	note 12:6,20,22 16:7 17:4,9,11	options 28:20
little 35:19	20:13 22:15 23:3 25:5	17:13 18:10,20,22 19:2	order 5:4 10:11 19:12,24 27:11
location 29:16,19	medication 26:11 27:12,14 28:5 30:14	notes 9:12 10:7 18:5,8,16 22:9,14	27:16,20 30:20 32:23
lock 34:9	30:16 31:4,21 32:4,7,20,24	24:21	orders 17:14,18 19:4,6,15 33:12
locked 29:6,11	32:24	notice 39:2	oriented 29:16,18,20
look 8:15 9:11,15 10:5,6,6,7,12	medications 30:9,11 32:11	november 1:20 38:5 39:11	osman 27:21
18:3,5,8,16 20:24 21:21	meghan 1:13 4:6 5:15 6:11 28:23	number 4:19 14:16	outcome 26:6 39:7
31:16 32:22	38:7,12	numbers 9:8 11:18	outcomes 26:13
looked 9:18 13:23	mentioned 39:4	nurse 6:16 7:13 13:9,11 14:2,10	overhead 13:10
looking 9:2 22:8 24:8	meyer 3:9	14:13 20:12 21:14,15 29:6	p
looks 8:2 9:2 10:14 20:23	michigan 2:5	29:11	
lorraine 1:9 2:16	misheard 36:1	nurses 13:20	p.c. 2:2
lot 20:16	morning 11:5 23:15	nursing 6:20,23,24 7:11 9:12,18	p.m. 1:21,22 11:9 21:18 30:6
low 29:5,10	morton 6:19	25:22	32:18 36:1,16 37:6
m	multiple 11:17	o	page 8:23 9:8 11:13,15,17 12:3
	muscle 28:10	oath 5:2	14:17,22,24 15:16 20:24
management 26:11	n	observation 12:6,20 16:20	21:1 22:12 25:14 26:12
manalastas 1:11 2:18		observed 11:24 16:4	27:4,6 28:13,16 30:8,12
manuel 1:11 2:18	nadkarni 33:6,8	obtained 7:17	31:20,21,23 32:8,10 33:2
march 11:4,5 12:1,2,13 13:1 15:4	name 5:15 13:24 14:12 23:20	o'clock 1:21 37:6	33:10,15 35:2,20 36:10,11
15:5,16 16:1 17:12,22	27:24 33:10	office 2:10	pages 8:15,19,22 9:7 15:1
21:18,18,22 23:15 28:2	named 5:9 33:6	officer 24:22	paper 9:10
30:6,14,15 32:1,17 33:13	names 13:19	officers 15:20 16:20	parents 10:23
35:5 36:15	need 9:15 10:5	offices 10:16	part 7:19 25:21
marked 4:19,22	needed 22:20 30:20,23 34:2	oh 10:4 35:1	participation 26:12
martkevicius 22:4	needs 17:16	okay 5:24 8:13 9:23 10:17,18	parties 5:5 38:24 39:6
mean 7:22 9:4 13:8 15:11 26:4,6	negative 22:21		paschos 1:11
27:2 28:9 29:18 33:18,19			pathways 29:7,12

[patient - resuscitation]

patient 9:20 10:21 15:6,18,21 16:13,17 17:15 19:12 20:11 20:22 22:22 24:10 26:14,17 29:7,13,20,24 31:9 33:1 35:13,14,16	point (cont.) 19:24 20:8 21:16 34:8 36:22	pursuant 1:14 5:4 39:2	refresh 31:17
patients 33:24	police 15:20 16:20 24:12,15,16,17 24:22 25:2	put 21:4 34:3	regina 20:23 21:22
paused 31:3	policies 24:19	q	registered 6:16
pending 15:12 38:7	position 29:5,11	question 6:5,6,8 8:10 10:3,12 14:19 15:11 23:1	related 25:23 39:6
people 21:16 24:9	possible 18:9	questioning 22:8	relates 33:2
person 21:22	power 25:22 26:13,14,18	questions 14:16 23:17 25:8	released 17:17
personally 38:6	pre 17:17	r	remember 10:21 11:2 14:4 16:22 17:8 18:1,6 19:1 21:17 30:4 34:4 35:3,22
pertaining 1:16	precautions 28:19 29:3 35:21	r.n. 7:15 28:23	remotely 1:18 5:3 38:6
phlebotomist 7:11	preparation 11:22	ragen 2:11 4:7,10 5:8,15,18 6:2,4 6:8,15 9:1 11:20 15:11,14 21:7 22:7,11 23:17 34:19 34:21 36:4,6,8,18	rendered 8:2
phrase 33:22	presence 38:17	rail 16:21	repeat 14:19 23:1
physically 24:9	present 24:12 29:5,10 39:3	rails 16:23 17:2,6 29:17	reported 1:23 38:16
physician 19:9,11 30:19 33:6	primary 20:12	ranges 22:21	reporter 1:18 4:22 5:1,3,23 23:9 39:15
physicians 18:6	pritzker's 5:4	read 15:8,8 23:8 25:19 28:21 29:2 35:8	represent 23:19
pick 9:10	prn 30:20 32:3,4	real 10:3 22:9	required 24:4
pill 28:6	probably 36:9	recall 13:18,21 20:9,10 24:23 28:5 33:7,9 35:18	resident 17:13,24 18:4,9,16,19
pina 1:17,23 38:4	procedure 1:15 5:6	received 17:14 19:4,15,23	residents 13:14
place 19:12 26:19 28:20 29:3 35:21	procedures 24:20	recollection 10:19 12:17 31:17	respective 38:24
placed 19:17 20:8	progressing 25:23 26:20,23,24 27:2,3	record 14:15,20 15:15,17 16:1 17:22 18:2 22:15 35:24 36:11	respiratory 22:3
placing 24:22	protocols 24:18	records 8:3 10:13 11:3 13:16,23 21:11 23:3 25:14	respond 13:15,20
plaintiff 1:6 2:9 5:7 35:21 38:10	provide 10:16	reduced 38:18	responded 13:17
plan 25:21,22 26:8,14,14,18	provided 20:16 21:23	reestablish 36:2	response 13:4,10
planning 26:9,12	providing 9:18,20	refer 30:8	restrained 34:9
please 5:21 6:6 29:2	psychiatric 13:12,19 14:13	reference 27:6,10 28:16,18	restraint 34:10
plus 22:21,24 23:4,7,10 24:2 31:6,7,11 32:6	psychosis 10:22,24	reflect 12:13 17:5	restraints 17:14 19:5,12,16,18,24 20:9 31:12 34:3,5,7,10,13
point 10:11 17:14 19:5,12,16,18	psychotic 12:18		results 9:19,24 29:4
	pull 21:3		resuscitation 29:15
	purdue 6:22		

[review - times]

review 8:6 31:18 35:17	second 7:12,21 14:11 21:2 24:23	specifically 19:3	t
reviewed 8:8 10:4 11:21	security 13:13	spoke 8:11	taken 1:16 5:2 20:22
reviewing 9:14 10:4,9	sedation 22:16,19 23:5 24:1 31:5	sprague 1:12 2:19	talk 5:19 8:1,12
richard 2:12	32:5	ss 38:2	talked 34:22 35:1,20
richmond 22:15 23:5 31:5 32:5	seen 13:24	stabbing 10:23	team 13:4,10,15
right 7:15 8:22 9:11,23 13:24 18:17 19:19 21:19 22:2 24:10 25:3,6 35:10 36:3,6 36:23	set 10:14 39:10	stack 9:3,3,11	tech 20:21,21
risk 17:16 19:22 20:2,4 24:1 33:16,21 34:13	share 10:17	staff 17:16 19:22 20:2,4 31:10 33:23	tell 6:6 11:24 13:16 15:3 22:23 23:2,9 24:17 27:10,19 31:4 31:7,24 32:13
risperdal 32:14	sharing 22:7	standard 16:24	telling 30:3
role 7:18	sheriff 1:7 5:10 23:20 38:10	start 7:8 11:9	tends 9:3
room 15:20 29:7,12,16,19,20	shift 11:7 21:17 22:20 26:20	started 7:10 11:7	terms 24:8
rpr 1:23	shorthand 1:17 39:15	state 1:19 38:1	testified 6:13
rules 1:14 5:19	show 32:10	states 1:1,15 38:8	testify 38:13
s	showed 20:18,19 21:11	state's 2:10 3:2	testimony 38:15,20 39:10
safety 17:16 19:22 20:2 28:19 29:3 33:16,21 34:13 35:21	shown 30:12 31:23 32:8	station 29:6,12	thank 25:9 34:16 37:1
salte 14:2,5	side 15:7,18 16:21,23 17:2,6 29:17	stay 7:18	thanks 23:18
salte's 13:24 14:12	signature 37:4 38:22	stenographically 38:16	therapist 22:3
saw 20:16	signs 29:4,9	steve 1:11	thereof 39:8
saying 13:22	single 16:10	stop 22:7	thick 9:11
says 11:16 12:3,11,21 16:12 17:9,13 18:22	sitting 12:4	street 3:4	thing 8:9 35:19
scale 22:16,19 23:5,11 31:6 32:5	situation 13:11	suit 39:7	think 9:3 10:1,2,4 33:15 35:2
scared 34:3,4	slip 29:14	suite 2:5,12 3:4	thomas 3:10
scheduled 32:24	slowly 29:2	supasanguan 1:12 2:19	thought 22:24 35:20,24
school 7:12	soft 34:10	sure 13:23 15:8	tiago 13:24 14:2,5,12
science 6:20,24	sorry 6:3 31:3	surgical 7:24	tie 34:11
screen 10:17 21:5 22:7	south 2:5	sworn 5:14 6:12 38:13	time 5:23 6:4,4 9:17,17 10:11 11:7 16:4,15 18:6 22:1,23 26:19 31:15,19 34:13,24
	spaceship 10:15,15	symptoms 29:4,10	times 7:23 22:24 23:2,6,9,14
	speaking 13:13		
	special 12:22		

[today - zoom]

today 8:7	unresponsive 22:21	william.ragen 2:15
tom 5:11 10:13 15:12	upper 17:6 29:17	wit 38:5
tomasik 3:10 5:11,11 8:21 11:19 15:13 21:4 34:18 36:3,5,7 36:19 37:4	use 29:17,19,21 34:11	witness 4:4 5:12,13,17 6:1,3,7,10 8:23 21:6 38:16,17,21
top 17:3 19:7	usually 5:20	word 16:10
transcript 38:20	v	work 11:9 33:3
transcription 38:19	vargas 1:5 38:10	worked 14:10
treated 11:4	vedrine 3:9	working 7:8
trigger 8:10	verbal 27:16,20 30:18	wrist 34:10,11
true 38:19	videoconferencing 5:2	wrists 34:8
truth 38:13,14,14	violent 31:10	write 18:20 26:22 34:14
try 21:2 36:2	visitor 29:8,13	wrote 15:3,5 18:10 19:21 25:20 25:22 26:2,24 29:18 33:15 33:20 34:12
trying 15:19 16:9 19:20,20 20:6 33:21 34:2	vitals 20:18,19,22 21:12,23	z
ttomasik 3:14	vs 1:7	ziprasidone 36:23
turn 11:13	w	zoheb 27:21
type 34:9	wait 5:21 34:23	zoom 1:18 2:3,4,11 3:3,10 38:6
types 34:7	waive 37:4	
typewriting 38:18	waived 38:23	
u	want 10:7 11:16	
uh 6:1	wanted 18:15 35:16	
uncooperative 12:15	wants 8:21	
undergrad 6:18	warrenville 3:12	
understand 6:5,6	washington 3:4	
understood 6:9 30:2	weger 1:13 4:6 5:16 6:11 28:23 38:7,13	
undetermined 38:8	went 6:19,21 7:12 15:20 36:13	
unit 7:12	west 3:4	
united 1:1,15 38:8	wheels 29:5,11	
university 6:22	whereof 39:10	
	william 2:11	