

Missing Expert Report

Missing Expert Report — No opposing expert report was entered. Claim language in this packet is predicted/default template text, not extracted from a real expert. Enter the opposing expert profile in Report Setup → Opposing Expert panel and regenerate before deposition, mediation, or trial use

[Open Report Setup → Opposing Expert panel](#)

Expert Rebuttal / Counter-Opinion

Case: **test-case-5-6143587d0932ce510d808ba396be34fb** · Tier: **premium** · Events: 22

1. Executive Summary

How to Use This Packet

- Step 0 — Load opposing expert profile (required before trial use)
- Step 1 — Review high-level anchors as predicted defaults only
- Step 2 — Validate source-linked chart corrections
- Step 3 — Walk severity-coded timeline
- Step 4 — Verify OCR anomalies
- Step 5 — Use Counsel Action Checklist
- Step 6 — Pull full Bates citations from Appendix

Rebuttal Strength Key:

- **STRONG:** Direct chart contradiction with dated source — highest deposition leverage
- **MODERATE:** Chart-backed support; corroborate with Bates-stamped exhibits
- **WEAK:** Contextual support only; verify against source PDFs before use

Narrative Summary of Injury Course

The indexed injury course begins on 01/08/2024 with encounter 02 — urgent care visit date: 01/08/2024 | purpose: index fall · mild shoulder/hip · no...see appendix for full excerpt

Objective imaging on 01/24/2024 documents encounter 07 — orthopedic clinic date: 01/24/2024 | purpose: ortho eval · mri...see appendix for full excerpt

Physical therapy is documented on 02/08/2024 with 80.0% compliance

The record contains conflicting **mechanism-of-injury** narratives that undermine a single consistent story

Imaging delay signals (7 indexed) appear in the chronology after the index event

Risk Flags for Opposing Expert

MOI contradictions

Missed escalation

Pharmacy hopping

Delayed imaging

OCR anomalies

What this rebuttal does: This packet maps predicted/default opposing-expert claim templates to chart-verified sources and scores rebuttal strength using deterministic chronology intelligence. No opposing expert report was on file when this snapshot was generated

What it does not do: This is not a validated rebuttal to a real opposing expert. It is not medical opinion or legal advice. Claim lines labeled 'Predicted claim' are defaults — enter the expert profile and regenerate before deposition, mediation, or trial use

How counsel should use it: Treat every 'Predicted claim' line as provisional. Load the opposing expert profile in Report Setup, regenerate, then verify OCR anomalies and Appendix citations

Counsel Interpretation Notes (Auto-Generated)

Counsel Interpretation Notes (Auto-Generated) — meaning of chart signals, not legal conclusions

- **Mechanism-of-Injury Contradiction:** The record shows 11 distinct **mechanism-of-injury** accounts found across 9 encounter(s) (e.g., **Mechanism of Injury** (MOI): Patient slipped in kitchen..., SSED APPOINTMENT Reason scheduled: Post-fall recheck after..., **Mechanism of Injury**: Pt reports falling backwards, landing...), which undermines any expert claim of a single consistent mechanism
- **PT compliance:** PT compliance is documented at 80.0% with improvement trajectory — rebutting non-compliance assertions
- **Imaging timeline:** Imaging delay signals indexed (7 row(s)) — use to rebut claims that imaging was timely or unnecessary
- **Vitals escalation:** 1 **missed - escalation** flag(s) indexed — rebut severity minimization

Defense Themes Neutralized

Defense Theme	Chart Contradiction	Strength
No objective imaging / findings	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see...see Appendix for full excerpt	Strength: STRONG
Non-compliance with rehabilitation	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory...see...see Appendix for full excerpt	Strength: STRONG
Single consistent mechanism of injury	Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP	Strength: STRONG

Defense Theme	Chart Contradiction	Strength
Clinical severity minimized	ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see...see Appendix for full excerpt	Strength: STRONG
Stable medication course	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review · delayed neurology for hand...see Appendix for full excerpt	Strength: MODERATE
Treatment necessity / billing	CPT 99233 (DOS missing on billing extract)	Strength: MODERATE

Scope & Limitations

- Missing Expert Report — No opposing expert report was entered. Claim language in this packet is predicted/default template text, not extracted from a real expert. Enter the opposing expert profile in Report Setup → Opposing Expert panel and regenerate before deposition, mediation, or trial use
- Deterministic chart intelligence — factual anchors only, not medical or legal opinion
- Opposing expert assertions must be counsel-entered or PDF-imported; chart OCR does not parse expert reports
- OCR anomaly flags require verification against source PDFs before deposition or trial use
- This report does not offer medical or legal opinions. It presents deterministic, source-linked factual rebuttal materials derived from the medical record and sibling report snapshots — for counsel to evaluate against an opposing expert report

2. Rebuttal Anchors

The record contains five high-leverage contradictions: imaging, PT compliance, MOI inconsistency, abnormal vitals, and medication changes

The record contains 11 distinct mechanism-of-injury accounts found across 9 encounter(s) (01/08/2024, 01/12/2024, 01/19/2024, 01/24/2024, 02/08/2024, 03/01/2024, 03/18/2024, 04/10/2024, ...). These undermine any single-mechanism testimony

● Imaging — Strength: **STRONG**

Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings

Chart Rebuttal: ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see...see Appendix for full excerpt

Citation: BATES-000007 — Orthopedic Clinic (01/24/2024) Full text in Appendix.

Why It Matters: This dated imaging entry directly contradicts the opposing expert's assertion

PT — Strength: STRONG

Predicted claim (no expert report on file): Opposing expert asserts absence of **physical therapy** compliance or rehabilitation

Chart Rebuttal: ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory...see...see Appendix for full excerpt

Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024) Full text in Appendix.

Why It Matters: This documented PT session directly contradicts the opposing expert's assertion

MOI — Strength: STRONG

Predicted claim (no expert report on file): Opposing expert misstates the **mechanism of injury** or index event

Chart Rebuttal: **Mechanism of Injury** (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Citation: Urgent Care Visit (01/08/2024) Full text in Appendix.

Why It Matters: This conflicting mechanism-of-injury entry directly contradicts the opposing expert's assertion

Vitals — Strength: STRONG

Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite **missed escalation** signals

Chart Rebuttal: ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see...see Appendix for full excerpt

Citation: BATES-000002 — Urgent Care Visit (01/08/2024) Full text in Appendix.

Why It Matters: This abnormal vitals entry directly contradicts the opposing expert's assertion

Medication — Strength: MODERATE

Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without documented changes

Chart Rebuttal: ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review · neurology for hand...see Appendix for full excerpt

Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024) Full text in Appendix.

Why It Matters: This medication change directly contradicts the opposing expert's assertion



Billing — Strength: MODERATE

Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart

Chart Rebuttal: CPT 99233 (DOS missing on billing extract)

Citation: Billing analysis snapshot Full text in Appendix.

Why It Matters: This billing anomaly directly contradicts the opposing expert's assertion

Top 5 Impeachment Questions

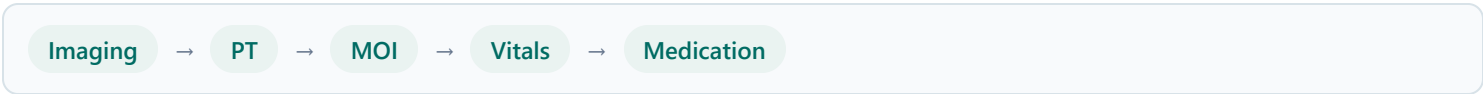
Imaging: Doctor, you testified that no imaging supported this injury — yet the chart documents imaging on 01/24/2024. Can you reconcile that with your report

PT: You stated the patient did not comply with rehabilitation — yet PT notes show ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | Purpose: PT eval...see Appendix for full excerpt.. How do you explain that discrepancy

MOI: The record contains conflicting Mechanism-of-Injury entries, including Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on...see Appendix for full excerpt.. Which version did you rely on, and why

Vitals: Abnormal vitals were documented on 01/08/2024 without escalation — yet you minimized clinical severity. Walk me through that decision

Rebuttal Map



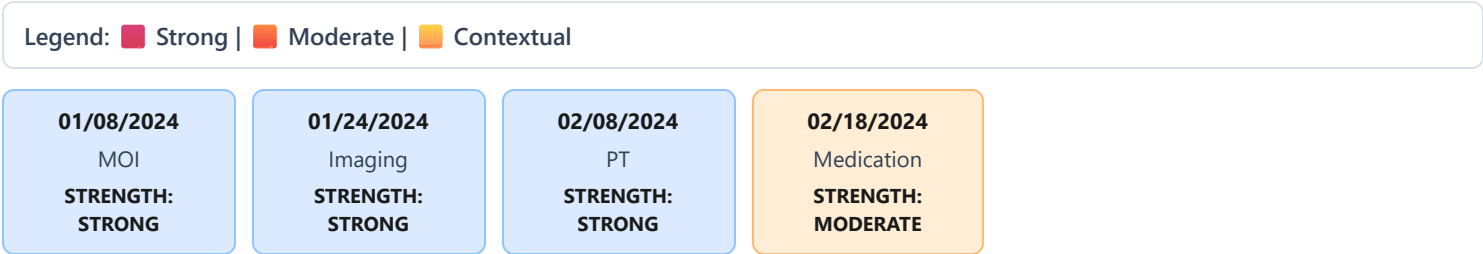
Category	Predicted claim	Chart Rebuttal	Strength	Bates
Imaging	Opposing expert asserts absence of imaging or objective findings	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see... see Appendix for full excerpt	Strength: STRONG	BATES-000007 — Orthopedic Clinic (01/24/2024)
PT	Opposing expert asserts absence of physical therapy compliance or rehabilitation	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory...see... see Appendix for full excerpt	Strength: STRONG	BATES-000009 — Physical Therapy Evaluation (02/08/2024)
MOI	Opposing expert misstates the mechanism of injury or index event	Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP	Strength: STRONG	Urgent Care Visit (01/08/2024)
Vitals	Opposing expert minimizes clinical severity despite missed escalation signals	ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see... see Appendix for full excerpt	Strength: STRONG	BATES-000002 — Urgent Care Visit (01/08/2024)

Category	Predicted claim	Chart Rebuttal	Strength	Bates
Medication	Opposing expert asserts a stable medication course without documented changes	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review · delayed neurology for hand...see Appendix for full excerpt	Strength: MODERATE	BATES-000012 — Orthopedic Follow-up (02/18/2024)
Billing	Opposing expert characterizes billing or medical necessity inconsistently with the chart	CPT 99233 (DOS missing on billing extract)	Strength: MODERATE	Billing analysis snapshot

Deposition Leverage Notes

- Imaging:** Walk the expert through imaging dates before accepting any no-objective-finding testimony
- PT:** Use PT compliance percentages and session notes to impeach non-compliance assertions
- MOI:** Confront the expert with dated MOI contradictions to undermine a single-mechanism narrative
- Vitals:** Use missed-escalation vitals to challenge severity minimization under oath

Rebuttal Heatmap



Deposition Leverage Points

- Walk through imaging dates before accepting no-objective-finding testimony
- Highlight PT compliance percentages and session notes in deposition
- Verify MOI contradictions with witness using dated mechanism entries
- Use vitals escalation gap to challenge severity minimization
- Use medication change entries to rebut stable-course narrative
- Confirm OCR anomalies against source PDFs before relying on them

3. Source-Linked Factual Corrections

imaging (Strong)

Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings

Chart Rebuttal: ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see Appendix for full excerpt

Citation: BATES-000007 — Orthopedic Clinic (01/24/2024) Full text in Appendix.

ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic —.....see Appendix for full excerpt.

Why It Matters: This dated imaging entry directly contradicts the opposing expert's assertion

pt (Strong)

Predicted claim (no expert report on file): Opposing expert asserts absence of **physical therapy** compliance or rehabilitation

Chart Rebuttal: ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory...see Appendix for full excerpt

Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024) Full text in Appendix.

*ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009...see...see Appendix for full excerpt.*

Why It Matters: This documented PT session directly contradicts the opposing expert's assertion

MOI (Strong)

Predicted claim (no expert report on file): Opposing expert misstates the **mechanism of injury** or index event

Chart Rebuttal: **Mechanism of Injury** (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Citation: Urgent Care Visit (01/08/2024) Full text in Appendix.

Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Why It Matters: This conflicting mechanism-of-injury entry directly contradicts the opposing expert's assertion

Vitals (Strong)

Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite **missed** **escalation** signals

Chart Rebuttal: ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see Appendix for full excerpt

Citation: BATES-000002 — Urgent Care Visit (01/08/2024) Full text in Appendix.

ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see Appendix for...see...see Appendix for full excerpt.

Why It Matters: This abnormal vitals entry directly contradicts the opposing expert's assertion

Medication (Moderate)

Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without documented changes

Chart Rebuttal: ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI reviewiew · **delayed** neurology for hand tingling...see Appendix for full excerpt

Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024) Full text in Appendix.

*ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI reviewiew · **delayed** neurology for hand tingling BATES-000012 Harlan...see...see Appendix for full excerpt.*

Why It Matters: This medication change directly contradicts the opposing expert's assertion

Billing (Moderate)

Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart

Chart Rebuttal: CPT 99233 (DOS missing on billing extract)

Citation: Billing analysis snapshot Full text in Appendix.

CPT 99233 (DOS missing on billing extract)

Why It Matters: This billing anomaly directly contradicts the opposing expert's assertion

Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart

Chart Rebuttal: CPT 11042 (DOS missing on billing extract)

Citation: Billing analysis snapshot Full text in Appendix.

CPT 11042 (DOS missing on billing extract)

Why It Matters: This billing anomaly directly contradicts the opposing expert's assertion

4. Timeline Engine

The timeline below highlights severity-coded events relevant to rebuttal themes. 7 indexed imaging delays

Timeline shows repeated **Mechanism-of-Injury contradiction**s, multiple **missed**-care events, **delayed** imaging, abnormal **vitals** without documented **escalation**, and related care-pattern signals

Imaging Delay Events (3)

01/19/2024 — ENCOUNTER 04 — EMERGENCY Department
Visit Date: 01/19/2024 | Purpose: ED: MOI c...

Imaging Delay

MOI Contradiction

OCR Anomaly

ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 | Purpose: ED: MOI **contradiction** · **vitals** non-**escalation** · ICD · **delayed** XR BATES-000004 FACILITY: Metro General Hospital — EMERGENCY DEPT...see Appendix for full excerpt

Citation: BATES-000004 — EMERGENCY Department Visit (01/19/2024)

01/19/2024 — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 | Purpose: Delayed X...

Imaging Delay

ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 | Purpose: **Delayed** XR left shoulder (**delayed** imaging key event) BATES-000005 FACILITY: Metro General Imaging ENCOUNTER 05 — Radiology...see Appendix for full excerpt

Citation: BATES-000005 — Radiology / Imaging Report (01/19/2024)

02/05/2024 — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 | Purpose: Delayed MRI (~12 days af...

Imaging Delay

ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 | Purpose: **Delayed** MRI (~12 days after ortho) BATES-000008 FACILITY: Mountain View Imaging Center Patient: [Name]

Citation: BATES-000008 — MRI Imaging (02/05/2024)

Missed Care (2)

01/12/2024 — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 | Purpose: NO-SHOW / MISSED...

 Missed Care

ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 | Purpose: NO-SHOW / **MISSED** APPOINTMENT (care-gap)
BATES-000003 FACILITY: Riverside Family Medicine Patient: [Name]

Citation: BATES-000003 — Primary Care Office (01/12/2024)

02/22/2024 — ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 | Purpose: Missed app...

 Missed Care

Citation: BATES-000013 — Physical Therapy Progress (02/22/2024)

Abnormal Vitals (1)

01/08/2024 — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall — mild...

 Abnormal Vitals

ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not booked BATES-000002 FACILITY: Quick...see Appendix for full excerpt

Citation: BATES-000002 — Urgent Care Visit (01/08/2024)

Medication Changes (6)

01/20/2024 — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 | Purpose: CVS initial opi...

 Medication Change

ENCOUNTER 06 — **Pharmacy** Fill Record Date: 01/20/2024 | Purpose: CVS initial opioid + NSAID (days supply for early-refill math) BATES-000006 **PHARMACY** FILL / DISPENSE RECORD **Pharmacy**: CVS **Pharmacy** ...see Appendix for full excerpt

Citation: BATES-000006 — Pharmacy Fill Record (01/20/2024)

02/14/2024 — ENCOUNTER 11 — Pharmacy Fill Record Date: 02/14/2024 | Purpose: Walgreens early...

 Medication Change

Citation: BATES-000011 — Pharmacy Fill Record (02/14/2024)

02/18/2024 — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review — ...

 Medication Change

 OCR Anomaly

Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024)

03/02/2024 — ENCOUNTER 15 — Pharmacy Fill Record Date: 03/02/2024 | Purpose: CVS refill — mu...

 Medication Change

Citation: BATES-000015 — Pharmacy Fill Record (03/02/2024)

03/05/2024 — ENCOUNTER 17 — Hospital Admission — Inpatient Date: 03/05/2024 | Purpose: True...

 Medication Change

Citation: BATES-000017 — Hospital Admission — Inpatient (03/05/2024)

03/20/2024 — ENCOUNTER 21 — Pharmacy Fill Record Date: 03/20/2024 | Purpose: Gabapentin star...

 Medication Change

Citation: BATES-000021 — Pharmacy Fill Record (03/20/2024)

5. OCR Verification

OCR anomalies flagged for counsel verification — underlying chronology is not altered

Medication anomalies

[OCR anomaly — verify against source PDF] — non-formulary medication name detected
(01/19/2024)

[OCR anomaly — verify against source PDF] — non-formulary medication name detected
(02/18/2024)

ICD anomalies

[OCR anomaly — verify against source PDF] — non-standard ICD code
(01/19/2024)

Rebuttal Strength Map



STRONG (4) MODERATE (2) WEAK (0)

Overall rebuttal strength: High — multiple strong contradictions supported by chart-verified sources


Billing
Strength:
MODERATE


Imaging
Strength:
STRONG


Medications
Strength:
MODERATE


MOI
Strength:
STRONG


PT
Strength:
STRONG


Vitals

Strength:
STRONG

Chart Reliability Map

HIGH Imaging — Citation: BATES-000007 — Orthopedic Clinic (01/24/2024) — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval — MRI + PT orde...

HIGH PT — Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024) — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | Purpose: PT eval + multi...

HIGH MOI — Citation: Urgent Care Visit (01/08/2024) — Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

HIGH Vitals — Citation: BATES-000002 — Urgent Care Visit (01/08/2024) — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall — mild shoulder...

MODERATE Medication — Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024) — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review — delayed...

MODERATE Billing — Citation: Billing analysis snapshot — CPT 99233 (DOS missing on billing extract)

MODERATE Billing — Citation: Billing analysis snapshot — CPT 11042 (DOS missing on billing extract)

HIGH Timeline — Citation: BATES-000002 — Urgent Care Visit (01/08/2024) — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall — mild...

HIGH Timeline — Citation: BATES-000004 — EMERGENCY Department Visit (01/19/2024) — ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 | Purpose: ED: MOI c...

6. Counsel Action Checklist

☐ • Verify OCR anomalies

· 3 OCR flag(s) in Section 5 — confirm each against source PDFs

☐ • Pull Appendix citations

· Collect Bates-stamped PDFs referenced in Section 7 Appendix before deposition

☐ • Prepare impeachment questions

· Use Top 5 Impeachment Questions and Rebuttal Anchors for cross-examination hooks

❑ • **Cross-reference MOI contradictions**

· The record contains 11 distinct mechanism-of-injury accounts found across 9 encounter(s). These undermine any single-mechanism testimony

❑ • **Highlight PT compliance trajectory**

· PT compliance documented at 80.0% — highlight in deposition

❑ • **Flag imaging delays for causation rebuttal**

· Walk through imaging dates before accepting any no-objective-finding testimony

❑ • **Resolve chronology QA flags (duplicates / out-of-order events)**

· See chronology stress indicators in underlying reports

Final Counsel Summary

Overall, the chart contains multiple source-linked contradictions across imaging, PT, MOI, vitals, and medication changes. IMPORTANT: no opposing expert report was entered — claim language above is predicted/default template text, not extracted from a real opposing expert. Do not treat this packet as a validated rebuttal to counsel's actual expert until the opposing expert profile is loaded and the report is regenerated. Chart findings remain Bates-anchored facts and require no medical opinion

7. Appendix – Full Bates Citations

Imaging: Citation: BATES-000007 — Orthopedic Clinic (01/24/2024)

ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic —...see Appendix for full excerpt

PT: Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024)

ENCOUNTER 09 — **Physical Therapy** Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009...see Appendix for full excerpt

MOI: Citation: Urgent Care Visit (01/08/2024)

Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP

Vitals: Citation: BATES-000002 — Urgent Care Visit (01/08/2024)

ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see

Appendix for...see Appendix for full excerpt

Medication: Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024)

ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review · **delayed** neurology for hand tingling BATES-000012 Harlan...see Appendix for full excerpt

Billing: Citation: Billing analysis snapshot

CPT 99233 (DOS missing on billing extract)

Synthesis: Across imaging, pt, moi, vitals, medication, and billing, the chart provides multiple factual anchors that contradict core assertions in the opposing expert's report

- Standard turnaround:** 5–7 business days
- Standard QA:** Standard Veri Lumin DRE + workflow QA
- Premium turnaround:** 3–5 business days
- Premium QA:** Premium depth + expanded source checks
- Data sources:** chronology, billing, causation, damages, deviation, medical chronology, pre existing, treatment timeline

PREMIUM 1. Expert Exposure Matrix

Expert exposure matrix — anticipated expert/defense claims mapped to chart findings, exposure framing, and plaintiff mitigation. This is the core Premium forensic engine

Predicted claim	Chart finding	Exposure	Defense framing	Plaintiff mitigation
Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings	Rebut with BATES-000007 — Orthopedic Clinic (01/24/2024) — expert states "Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings."; chart shows "ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic —..."
Predicted claim (no expert report on file): Opposing expert asserts absence of physical therapy compliance or rehabilitation	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009 ===== PT EVAL / OUTPT REHAB ===== Facility: Peak Motion Physical Therapy Date of	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert asserts absence of physical therapy compliance or rehabilitation	Rebut with BATES-000009 — Physical Therapy Evaluation (02/08/2024) — expert states "Predicted claim (no expert report on file): Opposing expert asserts absence of physical therapy compliance..."; chart shows "ENCOUNTER 09 — Physical

Predicted claim	Chart finding	Exposure	Defense framing	Plaintiff mitigation
	Service: 02/08/2024 Pt: [Name] Therapist: J. Ruiz, DPT...			Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009..."
Predicted claim (no expert report on file): Opposing expert misstates the mechanism of injury or index event	Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert misstates the mechanism of injury or index event	Rebut with Urgent Care Visit (01/08/2024) — expert states "Predicted claim (no expert report on file): Opposing expert misstates the mechanism of injury or index event."; chart shows "Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP"
Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite missed escalation signals	ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see Appendix for full excerpt	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite missed escalation signals	Rebut with BATES-000002 — Urgent Care Visit (01/08/2024) — expert states "Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite missed..."; chart shows "ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see Appendix for..."
Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without documented changes	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand tingling BATES-000012 Harlan Shoulder Clinic — FOLLOW-UP Visit Date: 02/18/2024 Patient: [Name]	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without documented changes	Rebut with BATES-000012 — Orthopedic Follow-up (02/18/2024) — expert states "Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without..."; chart shows "ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand tingling BATES-000012 Harlan..."
Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart	CPT 99233 (DOS missing on billing extract)	Chart contradicts anticipated expert minimization	Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart	Rebut with Billing analysis snapshot — expert states "Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity..."; chart shows "CPT 99233 (DOS missing on billing extract)"
Defense will highlight MOI contradictions	11 distinct mechanism-of-injury accounts found	Mechanism-of-Injury	Defense will highlight MOI contradictions	Reconcile competing MOI accounts via Hierarchy of

Predicted claim	Chart finding	Exposure	Defense framing	Plaintiff mitigation
to attack credibility and argue that any later diagnosis cannot be reliably linked to a single industrial event	across 9 encounter(s) — resolve with counsel / treating provider before relying on a single MOI	Consistency	to attack credibility and argue that any later diagnosis cannot be reliably linked to a single industrial event	Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers
Defense will argue the chart is incomplete and that missing notes prevent reliable causation / deviation analysis — and may imply the gaps favor the defense narrative	1 documentation-gap event(s) flagged in the causation timeline	Documentation Completeness	Defense will argue the chart is incomplete and that missing notes prevent reliable causation / deviation analysis — and may imply the gaps favor the defense narrative	Issue record requests / subpoenas for: 02/22/2024 (unspecified facility): Timely order / performance of indicated care
Defense will challenge any medication-related causation theory as unsupported by chart intelligence	Medication premium intelligence not available for this case	Medication-Causation Intelligence	Defense will challenge any medication-related causation theory as unsupported by chart intelligence	Enable medication premium enrichment / causation maps for pharmacology-linked theories
Defense will argue any impairment is entirely pre-existing / degenerative and that apportionment cannot be performed without a documented pre-injury baseline	Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis	Baseline / Pre-Existing Medical Records	Defense will argue any impairment is entirely pre-existing / degenerative and that apportionment cannot be performed without a documented pre-injury baseline	Subpoena pre-injury primary-care / specialty records for the 2–5 years preceding 12/15/2023 (or longer if chronic conditions are alleged)
Timeline / sequence challenge	ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 Purpose: NO-SHOW / MISSED APPOINTMENT (care-gap) BATES-000003 FACILITY: Riverside Family Medicine Patient: [Name]	Chronology inconsistency or care-gap signal	Defense may exploit sequence gaps or missed follow-up language	Anchor to dated timeline anchors and cure missing records via discovery

PREMIUM

2. Causation Counter-Analysis

Forensic causation counter-analysis — alignment modules only, not medical opinion. Includes but-for comparison, aggravation alignment, alternative-cause exposure, MOI/imaging consistency checks, and pre-existing separation

But-For Causation Analysis

- [01/08/2024] But for "Contusion" (strength: moderate), the downstream deterioration/harm pathway documented in the chart may not have occurred as recorded — counterfactual framing only, not a certainty determination (confidence: moderate)

Requires Expert Clinical Correlation: heuristic causal-strength signals were found, but no citation-grounded causal chain reached high confidence

Counterfactual framing for attorney argument development — requires expert corroboration before use in a filing or testimony

Aggravation vs. New Injury Analysis Grounded

Classification: **delayed diagnosis possible aggravation or progression**

Earliest MOI encounter: 01/08/2024 · **Initial diagnosis:** 01/19/2024 · **Days between:** 11

Pre-existing condition references

When	Excerpt	Source
03/01/2024	ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Purpose: Acute flare; abnormal vitals not escalated BATES-000014 FACILITY: Quick Care Urgent Clinic Visit Date: 03/01/2024 Patient: [Name]	Urgent Care Visit (03/01/2024)
12/15/2023	ENCOUNTER 01 — Primary Care — Pre-Existing Date: 12/15/2023 Purpose: Pre-index chronic LBP (pre-existing condition module) BATES-000001 FACILITY: Riverside Fam	Primary Care — Pre-Existing (12/15/2023)

Timing comparison is deterministic date arithmetic only — whether this represents a new injury vs. acute aggravation of a pre-existing condition requires expert medical review

Differential Etiology Module Grounded

Physician triage tool — not a diagnostic determination. Rule-Out Probability disclaimer: competing-diagnosis pairings and rule-in / rule-out candidates are a physician triage screen for chart review — not a diagnostic determination, probability of diagnosis, or medical opinion. This module does not establish or exclude disease. A reviewing physician / retained medical expert must independently confirm or reject each candidate before any clinical or medicolegal use

Grounded clinical findings

Finding	Body region	Source
No acute fracture. Mild AC joint osteoarthritis. Soft tissue swelling	LEFT SHOULDER	RITA_Synthetic_Full Case_[Name].json
Partial-thickness bursal-sided tear of supraspinatus (~8 mm), Mild subacromial bursitis, Intact labrum; no full-thickness tear, AC joint: mild OA (aligns...	LEFT SHOULDER WITHOUT CONTRAST	RITA_Synthetic_Full Case_[Name].json
partial bursal-sided SST tear	shoulder	RITA_Synthetic_Full Case_[Name].json
no acute intracranial hemorrhage. Correlate clinically	head noncontrast	RITA_Synthetic_Full Case_[Name].json
Mild trochanteric bursitis. No fracture. Labrum intact	RIGHT HIP WITHOUT CONTRAST	RITA_Synthetic_Full Case_[Name].json

MOI Consistency Check

MOI consistency check — chart-index mechanism vs anticipated expert minimization themes

Index event: 01/08/2024 · ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall; mild shoulder/hip; no imaging; PCP f/u not booked BATES-000002 FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen, PA-C · BATES-000002 · Urgent Care Visit (01/08/2024)

Imaging Consistency Check

Imaging consistency check — objective findings timeline for causation rebuttal

Date	Finding	Source
01/24/2024	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	BATES-000007 · Orthopedic Clinic (01/24/2024)
02/05/2024	ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Purpose: Delayed MRI (~12 days after ortho) BATES-000008 FACILITY: Mountain View Imaging Center Patient: [Name]	BATES-000008 · MRI Imaging (02/05/2024)
02/18/2024	ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 Purpose: MRI review; delayed neurology for hand tingling BATES-000012 Harlan Shoulder Clinic — FOLLOW-UP Visit Date: 02/18/2024 Patient: [Name]	BATES-000012 · Orthopedic Follow-up (02/18/2024)
03/15/2024	ENCOUNTER 19 — EMG / Nerve Study Date: 03/15/2024 Purpose: Electrodiagnostics supporting CTS BATES-000019 Metro Neuro Associates — EMG/NCS REPORT Study Date: 03/15/2024 Patient: [Name]	BATES-000019 · EMG / Nerve Study (03/15/2024)
03/18/2024	ENCOUNTER 20 — MRI Hip (Out-of-Order Date Stress) Date: 03/18/2024 Purpose: Hip MRI dated after shoulder saga (chronology ordering stress) BATES-000020 FACILITY: Mountain View Imaging Center Patient: [Name]	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)

Pre-Existing Condition Separation

Pre-existing condition separation for aggravation vs new injury framing

Pre-existing summary available — use with aggravation vs new injury timing.

PREMIUM

3. SOC Deviation Counter-Mapping

SOC deviation counter-mapping — no named clinical protocols or counter-mapping rows loaded for this case. Generate Reference/So C deviation report when counsel needs protocol-linked SOC rebuttal

PREMIUM

4. Premium Impeachment Package

Premium impeachment package — strategic vectors with counsel response, records to cure, and suggested discovery requests

Impeachment vector	Counsel response	Records to cure	Suggested discovery
Documentation gap — Reference Standard-of-Care Protocols	Reference protocols on file		Targeted discovery: Reference protocols on file
Documentation gap — Deviation of Care	Deviation of Care snapshot available		Targeted discovery: Deviation of Care snapshot available

Impeachment vector	Counsel response	Records to cure	Suggested discovery
Snapshot			
Documentation gap — Mechanism-of-Injury Documentation	Forensic Causation Module verified grounded MOI language in the chart		Targeted discovery: Forensic Causation Module verified grounded MOI language in the chart
Documentation gap — Mechanism-of-Injury Consistency	Reconcile competing MOI accounts via Hierarchy of Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers	Reconcile competing MOI accounts via Hierarchy of Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers	Targeted discovery: Reconcile competing MOI accounts via Hierarchy of Reliability review (Intake > Initial ED > Progress Notes) and obtain clarifying statements from the claimant / treating providers
Documentation gap — Imaging / Objective Findings	Forensic Causation Module verified grounded imaging findings in the chart		Targeted discovery: Forensic Causation Module verified grounded imaging findings in the chart
Documentation gap — Documentation Completeness	Issue record requests / subpoenas for: 02/22/2024 (unspecified facility): Timely order / performance of indicated care	Issue record requests / subpoenas for: 02/22/2024 (unspecified facility): Timely order / performance of indicated care	Targeted discovery: Issue record requests / subpoenas for: 02/22/2024 (unspecified facility): Timely order / performance of indicated care
Missing baseline / omitted records	Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis	Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis	Request complete records: Chronology contains zero encounters before the earliest MOI / injury date. Baseline status is required for apportionment analysis
Mischaracterized PT compliance	Chart documents PT/rehabilitation activity (4 PT-linked events indexed). ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009 ==== PT EVAL / OUTPT REHAB ==== Facility: Peak Motion Physical Therapy Date of Service: 02/08/2024 Pt: [Name] Therapist: J. Ruiz, DPT...	BATES-000009 · Physical Therapy Evaluation (02/08/2024)	PT records, attendance logs, and prescribing notes
Mischaracterized medication adherence	2 medication(s) filled at multiple pharmacies (max 2 facilities for one med)		Pharmacy records, medication reconciliation, and pain-management notes
Mischaracterized medication adherence	2 medication(s) associated with multiple prescribers / provider IDs		Pharmacy records, medication reconciliation, and pain-management notes
Mischaracterized medication adherence	1 overlapping same-medication fill interval(s)		Pharmacy records, medication reconciliation, and pain-management notes

Impeachment vector	Counsel response	Records to cure	Suggested discovery
Mischaracterized medication adherence	1 early refill(s) before 80% of prior days supply elapsed		Pharmacy records, medication reconciliation, and pain-management notes
Mischaracterized medication adherence	Elevated diversion risk from combined signals: early refills, multiple pharmacies, multiple prescribers		Pharmacy records, medication reconciliation, and pain-management notes
Mischaracterized job-duty limitations	01/24/2024 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	Employer HR / payroll / RTW records	Job description, time-loss records, and functional capacity evaluation
Mischaracterized job-duty limitations	ENCOUNTER 23 — Physical Therapy Progress — Plateau / MMI path Date: 04/05/2024 Purpose: PT plateau language for MMI/RTW BATES-000023 Peak Motion Physical Therapy — PROGRESS DOS: 04/05/2024 Patient: [Name]		Employer records and treating-provider work-restriction notes
Mischaracterized MMI status	ENCOUNTER 23 — Physical Therapy Progress — Plateau / MMI path Date: 04/05/2024 Purpose: PT plateau language for MMI/RTW BATES-000023 Peak Motion Physical Therapy — PROGRESS DOS: 04/05/2024 Patient: [Name]		MMI/P&S declarations and follow-up permanency documentation

PREMIUM 5. Premium Exhibits Package

Premium exhibits battle plan — suggested order, tactical use, and category-specific exhibit sets

Open with index event and core treating records; deploy imaging and PT/pharmacy records for impeachment; use causation exhibits for MOI/aggravation framing; reserve SOC and billing exhibits for necessity and standard-of-care cross-examination

Suggested order

- BATES-000001 · Primary Care — Pre-Existing (12/15/2023)
- BATES-000002 · Urgent Care Visit (01/08/2024)
- BATES-000003 · Primary Care Office (01/12/2024)
- BATES-000004 · EMERGENCY Department Visit (01/19/2024)
- BATES-000005 · Radiology / Imaging Report (01/19/2024)
- BATES-000006 · Pharmacy Fill Record (01/20/2024)
- BATES-000007 · Orthopedic Clinic (01/24/2024)
- BATES-000008 · MRI Imaging (02/05/2024)
- BATES-000009 · Physical Therapy Evaluation (02/08/2024)
- BATES-000010 · Physical Therapy Progress (02/12/2024)

- BATES-000011 · Pharmacy Fill Record (02/14/2024)
- BATES-000012 · Orthopedic Follow-up (02/18/2024)

Impeachment exhibits

Order	Exhibit	Suggested use
6	BATES-000006 · Pharmacy Fill Record (01/20/2024)	Impeachment exhibit
9	BATES-000009 · Physical Therapy Evaluation (02/08/2024)	Impeachment exhibit
10	BATES-000010 · Physical Therapy Progress (02/12/2024)	Impeachment exhibit
11	BATES-000011 · Pharmacy Fill Record (02/14/2024)	Impeachment exhibit
13	BATES-000013 · Physical Therapy Progress (02/22/2024)	Impeachment exhibit
15	BATES-000015 · Pharmacy Fill Record (03/02/2024)	Impeachment exhibit
20	BATES-000021 · Pharmacy Fill Record (03/20/2024)	Impeachment exhibit
21	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)	Impeachment exhibit
22	BATES-000024 · Orthopedic MMI / RTW Summary (04/10/2024)	Impeachment exhibit

Causation exhibits

Order	Exhibit	Suggested use
5	BATES-000005 · Radiology / Imaging Report (01/19/2024)	Causation exhibit
7	BATES-000007 · Orthopedic Clinic (01/24/2024)	Causation exhibit
8	BATES-000008 · MRI Imaging (02/05/2024)	Causation exhibit
12	BATES-000012 · Orthopedic Follow-up (02/18/2024)	Causation exhibit
18	BATES-000019 · EMG / Nerve Study (03/15/2024)	Causation exhibit
19	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)	Causation exhibit

SOC exhibits

Order	Exhibit	Suggested use
24	Deviation of Care snapshot (rule findings)	SOC exhibit
28	RITA_Reference_So C_Manual_Sepsis_STEMI	SOC exhibit
29	Case chronology events (22 events)	SOC exhibit
30	RITA_Synthetic_Full Case_[Name].json	SOC exhibit

Full battle plan index

Order	Exhibit	Suggested use
1	BATES-000001 · Primary Care — Pre-Existing (12/15/2023)	Causation / timeline exhibit
2	BATES-000002 · Urgent Care Visit (01/08/2024)	Causation / timeline exhibit
3	BATES-000003 · Primary Care Office (01/12/2024)	Causation / timeline exhibit

Order	Exhibit	Suggested use
4	BATES-000004 · EMERGENCY Department Visit (01/19/2024)	Causation / timeline exhibit
5	BATES-000005 · Radiology / Imaging Report (01/19/2024)	Causation exhibit
6	BATES-000006 · Pharmacy Fill Record (01/20/2024)	Impeachment exhibit
7	BATES-000007 · Orthopedic Clinic (01/24/2024)	Causation exhibit
8	BATES-000008 · MRI Imaging (02/05/2024)	Causation exhibit
9	BATES-000009 · Physical Therapy Evaluation (02/08/2024)	Impeachment exhibit
10	BATES-000010 · Physical Therapy Progress (02/12/2024)	Impeachment exhibit
11	BATES-000011 · Pharmacy Fill Record (02/14/2024)	Impeachment exhibit
12	BATES-000012 · Orthopedic Follow-up (02/18/2024)	Causation exhibit
13	BATES-000013 · Physical Therapy Progress (02/22/2024)	Impeachment exhibit
14	BATES-000014 · Urgent Care Visit (03/01/2024)	Causation / timeline exhibit
15	BATES-000015 · Pharmacy Fill Record (03/02/2024)	Impeachment exhibit
16	BATES-000017 · Hospital Admission — Inpatient (03/05/2024)	Causation / timeline exhibit
17	BATES-000018 · Neurology Consult (03/11/2024)	Causation / timeline exhibit
18	BATES-000019 · EMG / Nerve Study (03/15/2024)	Causation exhibit
19	BATES-000020 · MRI Hip (Out-of-Order Date Stress) (03/18/2024)	Causation exhibit
20	BATES-000021 · Pharmacy Fill Record (03/20/2024)	Impeachment exhibit
21	BATES-000023 · Physical Therapy Progress — Plateau / MMI path (04/05/2024)	Impeachment exhibit
22	BATES-000024 · Orthopedic MMI / RTW Summary (04/10/2024)	Impeachment exhibit
23	Case chronology (22 events)	Causation / timeline exhibit
24	Deviation of Care snapshot (rule findings)	SOC exhibit
25	RITA_Reference_So C_Manual_Sepsis_STEMI	Causation / timeline exhibit

PREMIUM 6. Premium Counsel Strategy Memo

Premium counsel strategy memo — weaponized counter-opinion framing without medical or legal opinion

Box the expert in: Lead with 11 exposure-matrix rows tied to Bates-stamped records. Force the expert to concede chart dates and source documents before accepting broad opinions

Avoid traps: Do not treat heuristic causation or triage modules as medical opinions. Do not use billing figures until billing QA passes. Distinguish record gaps from established contradictions

Expose contradictions: 16 impeachment vectors and 4 discovery-gap rows indexed. Use factual corrections (quoted expert claim vs dated chart finding) before argument

Frame causation: Deploy but-for chain comparison, aggravation vs new injury alignment, alternative-cause exposure, MOI/imaging consistency checks, and pre-existing separation — expert correlation required. Loaded modules: but for causation analysis, aggravation vs new injury, differential etiology

Neutralize SOC claims: 0 SOC counter-mapping rows — generate Reference/So C deviation report for protocol citations

Deploy discovery requests: Convert 4 discovery-gap/limitation rows and impeachment 'records to cure' fields into targeted discovery before expert designation deadlines

Use exhibits tactically: Open with index event and core treating records; deploy imaging and PT/pharmacy records for impeachment; use causation exhibits for MOI/aggravation framing; reserve SOC and billing exhibits for necessity and standard-of-care cross-examination

Causation modules loaded: but for causation analysis; aggravation vs new injury; differential etiology

PREMIUM

7. Premium Rebuttal Draft

- Rebuttal draft (deterministic template) — verify all citations against Bates-stamped records before use
- 1. Imaging present on 01/24/2024 contradicts opposing expert's claim of 'no objective findings.': ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY...see Appendix for full excerpt. [Citation: BATES-000007 — Orthopedic Clinic (01/24/2024); Strength: STRONG]
- 2. Documented PT/rehabilitation contradicts opposing expert's non-compliance assertion.: ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory...see Appendix for full excerpt. [Citation: BATES-000009 — Physical Therapy Evaluation (02/08/2024); Strength: STRONG]
- 3. Multiple Mechanism-of-Injury narratives in the record undermine a single consistent mechanism.: Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP [Citation: Urgent Care Visit (01/08/2024); Strength: STRONG]
- 4. Abnormal vitals on 01/08/2024 without documented escalation contradict severity minimization.: ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u...see Appendix for full excerpt. [Citation: BATES-000002 — Urgent Care Visit (01/08/2024); Strength: STRONG]
- 5. Medication change documented on 02/18/2024 contradicts a stable-course assertion.: ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI review · delayed neurology for hand tingling...see Appendix for full excerpt. [Citation: BATES-000012 — Orthopedic Follow-up (02/18/2024); Strength: MODERATE]
- 6. Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart.: CPT 99233 (DOS missing on billing extract) [Citation: Billing analysis snapshot; Strength: MODERATE]
- 7. Predicted claim (no expert report on file): Opposing expert characterizes billing or medical necessity inconsistently with the chart.: CPT 11042 (DOS missing on billing extract) [Citation: Billing analysis snapshot; Strength: MODERATE]

- Counter to 'Predicted claim (no expert report on file): Opposing expert asserts absence of imaging or objective findings.': chart shows ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Purpose: Ortho eval · MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic —...see Appendix for full excerpt. (BATES-000007 · Orthopedic Clinic (01/24/2024))
- Counter to 'Predicted claim (no expert report on file): Opposing expert asserts absence of physical therapy compliance or rehabilitation.': chart shows ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009...see Appendix for full excerpt. (BATES-000009 · Physical Therapy Evaluation (02/08/2024))
- Counter to 'Predicted claim (no expert report on file): Opposing expert misstates the mechanism of injury or index event.': chart shows Mechanism of Injury (MOI): Patient slipped in kitchen, landed primarily on RIGHT HIP (Urgent Care Visit (01/08/2024))
- Counter to 'Predicted claim (no expert report on file): Opposing expert minimizes clinical severity despite missed escalation signals.': chart shows ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Purpose: Index fall · mild shoulder/hip · no imaging · PCP f/u not...see Appendix for...see Appendix for full excerpt. (BATES-000002 · Urgent Care Visit (01/08/2024))
- Counter to 'Predicted claim (no expert report on file): Opposing expert asserts a stable medication course without documented changes.': chart shows ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | Purpose: MRI reviewiew · delayed neurology for hand tingling BATES-000012 Harlan...see Appendix for full excerpt. (BATES-000012 · Orthopedic Follow-up (02/18/2024))

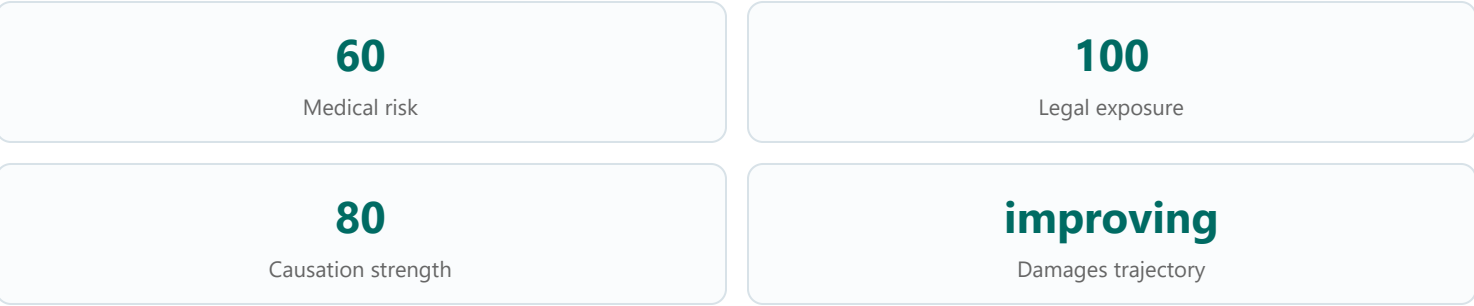
PREMIUM

8. Expert Claim Prediction

Predicted claim	Chart basis
Mechanism of injury inconsistent or exaggerated	11 distinct mechanism-of-injury accounts found across 9 encounter(s)
Pharmacy course suggests secondary gain or non-compliance	Pharmacy hopping signals detected

PREMIUM

9. Risk & Exposure Dashboard



Risk & exposure dashboard — heuristic scores for counsel strategy, not legal conclusions

PREMIUM

10. Omni Timeline (Photo EXIF)

22 merged events (0 photos, 22 chronology)

QUALITY ASSURANCE: WARN — PROVISIONAL

RITA V1.3.1 - QA Warn (Provisional) · Protocol v1.3.1 · Generated 2026-08-02T20:08:05+00:00

QA checks flagged 1 issue(s), or billing QA is provisional. Review before relying on this report in litigation deliverables.

- Billing Analysis QA gate status=warn. Closing banner must remain provisional — not VERIFIED.
- Pod billing: upstream billing_qa_gate=warn. Certification cannot be VERIFIED.

Pod billing · ledger sha256:23db6105 · quality=provisional · qa_gate=warn