Checklist: What a Medical Expert Needs

To get the most for money you spend on a defense medical expert, collect everything he needs to see and submit it together, clearly marked for easy reference in telephone conversations with the attorney. Include, in chronological order:

**Law Enforcement**
- Police reports
- 911 tape
- Video statements
- Scene photos or video if available

**Child Protection Services**
- All child protective services reports concerning the family

**Hospital** (if more than one hospital, keep records separate)
- Emergency Medical Services or ambulance records
- Admission sheet and emergency room admission record
- History and physical
- Discharge records
- Consults, especially ophthalmology consults. Ask for fundoscopic photographs specifically.
- Doctors’ progress notes
- Nurses’ notes
- Operative notes
- Radiology reports (CT and MRI reports) in chronological order. Make sure the report for the first scan is included.
- Lab reports in chronological order. Hematology, chemistry, bacteriology, etc.
- Medication records
- Doctors’ orders
- Ventilation records
- Physical therapy records (input, output, etc.)
- Photographs taken at the hospital

- CT scans and X-rays, on CD if done digitally and copies of films if not. Do not scan films onto CDs. The defense doctor will need to look at the exact images reviewed by the prosecution doctors.
- Post-discharge information (if the child survives)

**Prior Records**
- Prenatal records for the mother
- Birth records for both mother and baby
- Infant doctor visits, especially any shortly before the child’s collapse
- Medical records of siblings. Be careful to keep these separate from the baby’s records

**Medical Examiner or Coroner’s Reports**
- Autopsy report, including diagrams and notes
- Histology (may be handwritten)
- Neuropathology report, both gross and microscopic
- Eye report, including copies of photographs and recuts of the eye slides
- First call sheet and investigator’s report
- Receipts for evidence
- Death certificates, both temporary and final
- Autopsy photographs, including prints, and if taken digitally, digital images as well.
- Copies of X-rays taken prior to autopsy.
- Autopsy histology slides and if possible, unstained slides of the brain, especially the dura mater.
- Read the autopsy report to ensure that you have all consultation reports. There may be others not mentioned above (heart, etc.)

Get everything you can. If something is missing, include a page saying what you have done to try to get it and why it’s not there. Compile all records in order. Tab each section, including each hospital. Number all pages consecutively with colored ink.