

Rawlings Company

04/11/2017

RANDOLPH LAFFERTY 1201 NEW RD # 230 LINWOOD, NJ 08221

Re:

Our Client:

Cigna Health & Life Ins Co (PDP)

Member/Patient:

HILDA KENNEDY/HILDA KENNEDY

Date of Loss:

11/17/2014

Our Reference No.:

1254115

Policy Number:

44892014

Dear RANDOLPH LAFFERTY:

Enclosed, please find an itemized invoice of all prescriptions covered by Cigna Health & Life Ins Co (PDP) for HILDA KENNEDY that was filled on or after the date of loss to present.

Please make your check payable to Cigna Health & Life Ins Co (PDP) and mail to Rawlings Company, P. O. Box 2020, LaGrange, Kentucky 40031-2020. Thank you for your prompt attention to this matter.

Sincerely,

Brittany Barnes

1-844-815-2520 Ext 1544

BiA Jahans

FAX: (502) 753-7281

bjb@rawlingscompany.com

Healthcare information is personal and sensitive information, and you, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Disclosure of this information without additional patient consent or as permitted by law is prohibited.

11.04.2017 15:48:50

03/3

Rawlings Company

Member Id: 13544391901 Member Name: HILDA KENNEDY

Itemization of Expenses Paid

Reference Number: 1254115 Total Paid Claims: \$ 503.51

	19230357	19230364	19230371	19230378	19230384	19230388	19230389	19230403	Ref#	
	07/27/2016	03/31/2016	10/28/2015	07/24/2015	06/17/2015	05/04/2015	04/08/2015	19230403 03/01/2015 000000298063 WALGREENS 13056	Filled	Date
	000000258106	000000247887	000000234307	000000333663	000000221853	000000217635	000000215287	000000298063	RX#	
	WALGREENS S	WALGREENS S	WALGREENS S	07/24/2015 000000333663 WALGREENS 13056	WALGREENS S	WALGREENS S	WALGREENS S	WALGREENS 1	Pharmacy Name	
	07/27/2016 000000258106 WALGREENS SPECIALTY PHAR	03/31/2016 000000247887 WALGREENS SPECIALTY PHAR	10/28/2015 000000234307 WALGREENS SPECIALTY PHAR	.3056	SPECIALTY PHA	05/04/2015 000000217635 WALGREENS SPECIALTY PHAR	PECIALTY PHA	.3056	me	
	R 0022829831:	R 0022829831	R 0022829831	0022829831	06/17/2015 000000221853 WALGREENS SPECIALTY PHAR 00228298311 OXYCOD/APAP		04/08/2015 000000215287 WALGREENS SPECIALTY PHAR 00228298150 OXYCOD/APAP	00228298150	Drug Code	National
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Tota	TAB 10-325	TAB 10-325	TAB 10-325	TAB 10-325	TAB 10-325	TAB 5-325M	TAB 5-325M	TAB 5-325M		
Total Paid Claims: \$ 503.51	150.000	120.000	120.000	120.000	120.000	140.000	120.000	120.000	Quantity	
503.51	\$210.53	\$108.12	\$37.39	\$38.28	\$37.39	\$26.13	\$22.88	\$22.79	Amount	Paid

EXHIBIT P

HILDA KENNEDY

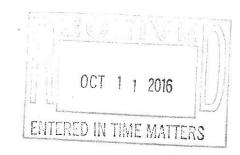
	Dates of Service	Provider	Total Amt. Billed	Total Amt. Paid By Medicare	Amount Unpaid by Insurance
1.	11/17/14	Exceptional Medical Transportation	\$390.46	\$390.46	0.00
2.	11/17/14- 11/25/14	ARMC	\$267,116.42	\$21,761.07	\$1,216.00
3.	11/17/14-06/18/14	Atlantic Medical Imaging/Atlantic Radiologists	\$6,482.00	\$440.08	\$1,718.00
4.	11/17/14- 11/25/14	ARMC Trauma	\$1,987.00	\$178.95	\$1,338.63
5.	11/17/14- 11/19/14	ARMC Anesthesiologists	\$8,600.70	\$409.02	\$104.27
6.	11/18/14	Atlantic Cardiology/Atlant iCare Physicians Group	\$1,266.00	\$221.73	\$56.57
7.	11/17/14- 01/27/15	Shore Orthopaedic University Associates (Dr. Islinger)	\$27,561.00	\$2,406.21	\$1,992.11
8.	11/18/14-12/12/14	Bacharach Institute	\$52,452.11	\$28,521.23	\$530.25
9.	11/25/14	AtlantiCare Para Transit	\$75.00	0.00	0.00
10.	11/25/14-	Egg Harbor Care Center	\$46,552.00	\$37,189.30	\$9,135.00 \$29.50 interest \$9,164.50
11.	11/26/14- 12/03/14	Dr. Behdokht Daneshvar	\$750.00	\$399.40	\$101.89
12.	12/13/14- 02/27/15	Quality Medical Associates – Dr. Sun Mioa	\$950.00	\$778.98	\$142.28
13.	12/17/14- 12/24/14	Salartash Surgical Associates	\$349.00	\$229.35	\$45.06
14.	01/09/15	Francis W. Previti, MD	\$1,430.00	\$424.15	\$116.84
15.	01/15/15- 02/23/15	South Jersey Infectious Disease	\$690.00	\$393.86	\$100.48
16.	01/27/15	Advanced Anesthesia	\$2,268.00	\$148.26	\$37.82

	TOTALS		\$487,696.69	\$95,616.45	\$16,986.04 \$29.50 interest
19.	09/08/15- 10/19/15	Mid-Atlantic Rehabilitation	\$1,025.00	\$957.55	\$67.45
18.	08/31/15	The Plastic Surgery Center	\$471.00	\$62.91	\$16.05
17.	01/27/15	Shore Medical Center	\$15,191.00	\$753.94	\$192.34

EXHIBIT Q

MICHAEL C. BURGER, SR.

6306 Roberts Avenue Mays Landing, NJ 08330



October 3, 2016

Randolph C. Lafferty, Esquire Cooper Levenson PA 1125 Atlantic Avenue, Suite 300 Atlantic City, NJ 08401

RE: Hilda Kennedy

Dear Mr. Lafferty:

You have asked that I provide an opinion regarding this matter. By way of background, I have had employment related experience in the field of medical billing/collections since approximately 1979. (See my attached Curriculum Vitae). In those capacities, I have become familiar with, and knowledgeable regarding, the usual, customary, fair and reasonable charges for doctor's services, hospital services, medicines, medical supplies, medical tests and other charges for health care related services. I acquired this knowledge not only by directly being employed by medical providers but also otherwise comparing charges as between various medical providers in the course of my employment.

I have specifically reviewed each and every bill on the attached "Exhibit A" entitled "Hilda Kennedy." In reviewing these bills, I reviewed the entry for each service in order to determine the specific service that was rendered. I then reviewed the charges assessed for each such service and compared that charge to my knowledge, experience and understanding of identical or similar charges by other providers for the same or similar service.

Based upon my knowledge, training and experience as well as the review that I conducted as outlined above, it is my opinion that the medical expenses on the attached "Exhibit A" regarding Hilda Kennedy for the described health care services are consistent with the usual, customary, fair and reasonable charges for the medical service provided.

I remain available to supplement this report as needed.

Very truly yours,

Michael & Burger, Sr.

EXHIBIT "A"

HILDA KENNEDY

	Dates of Service	Provider	Total Amt. Billed	Total Amt. Paid By Medicare	Amount Unpaid by Insurance
1.	11/17/14	Exceptional Medical Transportation	\$390.46	\$390.46	0.00
2.	11/17/14- 11/25/14	ARMC	\$267,116.42	\$21,761.07	\$1,216.00
3.	11/17/14- 06/18/14	Atlantic Medical Imaging/Atlantic Radiologists	\$6,482.00	\$440.08	\$1,718.00
4.	11/17/14- 11/25/14	ARMC Trauma	\$1,987.00	\$178.95	\$1,338.63
5.	11/17/14- 11/19/14	ARMC Anesthesiologists	\$8,600.70	\$409.02	\$104.27
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8.	11/18/14- 12/12/14	Bacharach Institute	\$52,452.11	\$28,521.23	\$530.25
9.	11/25/14	AtlantiCare Para Transit	\$75.00	0.00	0.00
10.	11/25/14-	Egg Harbor Care Center	\$46,552.00	\$37,189.30	\$9,135.00 \$29.50 interest \$9,164.50
11.	11/26/14- 12/03/14	Dr. Behdokht Daneshvar	\$750.00	\$399.40	\$101.89
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13.	12/17/14- 12/24/14	Salartash Surgical Associates	\$349.00	\$229.35	\$45.06
14.	01/09/15	Francis W. Previti, MD	\$1,430.00	\$424.15	\$116.84
15.	01/15/15- 02/23/15	South Jersey Infectious Disease	\$690.00	\$393.86	\$100.48
16.	01/27/15	Advanced Anesthesia	\$2,268.00	\$148.26	\$37.82

	TOTALS		\$487,696.69	\$95,616.45	\$16,986.04 \$29.50 interest
19.	09/08/15- 10/19/15	Mid-Atlantic Rehabilitation	\$1,025.00	\$957.55	\$67.45
18.	08/31/15	The Plastic Surgery Center	\$471.00	\$62.91	\$16.05
17.	01/27/15	Shore Medical Center	\$15,191.00	\$753.94	\$192.34

EXHIBIT R



BILL REVIEW AND ANALYSIS

For Hilda Kennedy



NOVEMBER 27, 2016 VALPAR CONSULTANTS, INC. 109 Windsong Drive Doylestown, PA 18901 November 27, 2016

Ms. Lindsay Byrne

Cooper Levinson

Attorneys at Law

1125 Atlantic Avenue

Atlantic City, NJ 08401

RE: Hilda Kennedy

DOB: 03/31/32

DOI: 11/17/14

INTRODUCTION:

Hilda Kennedy is an 84-year-old female who was hit as a pedestrian by a Jitney on the date of injury resulting in multiple injuries including right shoulder dislocation, right displaced proximal humerus fracture requiring open reduction and internal fixation, large rotator cuff tear, scapular fracture, left clavicular fracture, rib fractures, pneumothorax, and axillary nerve injury with atrophy and weakness of the deltoid muscle as well as post-concussion syndrome. She subsequently developed hematoma of the right arm and infection requiring irrigation and debridement. She required prolonged hospital course, inpatient acute and subacute rehabilitation, and ongoing outpatient management including referral for pain management.

The following is a bill review to determine if the charges contained in the billing statements are related to the motor vehicle accident and sequelae of these injuries as well as whether the charges are fair and reasonable. The medical bills were reviewed and compared to the medical records. Charges were compared to the Medical Fees in the United States 2016 database for the Atlantic City area as well as the American Hospital Directory for hospital database charges. This review is based on my knowledge and experience as a certified rehabilitation nurse with twenty years of experience in medical case management including the auditing and review of medical bills as well as my knowledge and experience as a certified life care planner with sixteen years of experience projecting future medical care cost projections

RECORDS REVIEWED:

- 1. Records of AtlantiCare Regional Medical Center
- 2. Records of Bacharach Institute for Rehabilitation
- 3. Records of Shore Orthopedic University Specialists
- 4. Records of Atlantic Medical Imaging
- 5. Records of Shore Medical Center
- 6. Records of Boardwalk Surgical Associates
- 7. Records of Mid Atlantic Rehabilitation Associates
- 8. Records of South Jersey Infectious Diseases

9. Billing Statements

BILL ANALYSIS:

The hospital and provider billing was analyzed to determine reasonableness and necessity of the charges. Enclosed please find a work sheet which details the charges by bill with a determination of the reasonableness and necessity of the charges and if any adjustments should be made. The sources for usual and customary charges included Medical Fees in the United States for South Jersey and American Hospital Directory. The summary below will total the re-priced (for usual and customary) bills by provider.

- 1. Egg Harbor Care Center- This charge would be reasonable for subacute rehabilitation for a two-and-a-half-week period. The average daily charge was \$620.00/day. Total reasonable charges- \$46,552.00
- 2. Shore Memorial- This charge would be reasonable for a one day admission for irrigation and debridement procedure. Total reasonable charges- \$15,191.00
- 3. The Plastic Surgery Center- The charge for an initial visit was higher than anticipated for the CPT code used. The total adjusted and reasonable charge- \$212.25
- 4. Mid Atlantic Rehabilitation- Charges related to office visits and EMG/NCS studies were reasonable. Total reasonable charges- \$1025.00
- 5. Advanced Anesthesia Associates- Charges related to anesthesia for irrigation and debridement procedure are reasonable. Total reasonable charges- \$2268.00
- 6. South Jersey Infectious Diseases- Charges for office visits are reasonable. Total reasonable charges-\$690.00
- 7. Dr. Previti- Charges for office visit and vascular studies are reasonable. Total reasonable charges-\$1430.00
- 8. Salartash Surgical Associates- Charge reasonable for office visit. Total reasonable charge-\$259.00
- 9. Quality Medical Billing- Charges for nursing home medical care and outpatient medical care are reasonable. Total reasonable charges- \$1400.00
- 10. Dr. Daneshvar- Charges related to hospital care are reasonable. Total reasonable charges-\$750.00
- 11. Dr. Sturr- Charges related to initial rehabilitation hospital evaluation are reasonable. Total reasonable charge- \$298.00
- 12. Bacharach Rehabilitation Physical Therapy- evaluation charges were higher than anticipated and were adjusted to usual and customary. Therapy charges were reasonable. Total reasonable charge- \$3950.00
- 13. Bacharach Rehabilitation Acute Rehabilitation- charges for acute inpatient rehabilitation were reasonable. Total reasonable charges- \$45,176.05
- 14. Bacharach Rehabilitation Physician Care- charges for physician hospital care were reasonable. Total reasonable charges- \$2958.00
- 15. AtlantiCare Regional Medical Center Medical Transport- charges for transportation were reasonable. Total reasonable charge- \$75.00

- 16. Shore Orthopedics- Charges for open reduction of the shoulder and rotator cuff repair were higher than anticipated based on the CPT codes used. Other surgical, office visit, and x-ray charges were reasonable. Total reasonable charges-\$19,570.88
- 17. Atlantic Cardiology- Charges for cardiac evaluation and echocardiogram were reasonable. Total reasonable charges-\$1266.00
- 18. ARMC Anesthesiologists- Charges for anesthesia for orthopedic procedures were reasonable. Total reasonable charges- \$8600.70
- 19. ARMC Trauma- Charges for critical care and hospital care were reasonable. Total reasonable charges- \$1987.00
- 20. Atlantic Medical Imaging- Charges for professional fees for x-rays, CT scans, MRI, ultrasound, and arterial studies were reasonable. Total reasonable charges- \$6,482.00
- 21. AtlantiCare Regional Medical Center- Charges for hospital admission which included three days in the ICU were reasonable and related to the motor vehicle accident. Total reasonable charges- \$267,116.42
- 22. AtlantiCare Regional Medical Center Mobile ICU- charges for mobile EMS for a critically injured patient were reasonable. Total reasonable charges- \$3254.00
- 23. Exceptional Medical Transport- charged for transportation were reasonable. Total reasonable charge-\$390.46

Total Charges Related to November 17, 2014 Motor Vehicle Accident- \$430,901.76

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All opinions have been stated with a reasonable degree of professional certainty. Should additional information become available I request the opportunity to supplement this report as necessary.

Sincerely,

Valerie V. Parisi RN CRRN CLCP Certified Life Care Planner Hilda Kennedy Medical Billing Chart

1/27/2015 Anesthesia 2/23/2015 Office Visit 2/5/2015 Office Visit 1/19/2015 Office Visit 1/19/2015 Office Visit 1/19/2015 Office Visit 1/9/2015 New Patient Visit 1/9/2015 New Patient Visit 1/9/2015 New Patient Visit 1/9/2015 New Patient Visit 12/17/2014 Nursing Facility Care Initia 12/13/2014 Nursing Facility Care 12/15/2014 Nursing Facility Care 12/26/2014 Nursing Facility Care 1/15/2015 Nursing Facility Care 1/15/2015 Nursing Facility Care 1/15/2015 Nursing Facility Care 2/3/2015 Nursing Facility Care 2/3/2015 Nursing Facility Care 2/3/2015 Office Visit 3/27/2015 Office Visit 5/1/2015 Office Visit 11/26/2014 Initial Hospital Visit 12/1/2014 Hospital Care 12/3/2014 Initial Hospital Visit	Date Item 12/13/2014 Subacute Rehabilitation 1/27/2015 Admission I and D 8/31/2015 New Patient Visit 10/19/2005 Office Visit 10/19/2015 Nerve Conduction Studies 10/19/2015 EMG 9/8/2015 Initial Visit
	Egg Harbor Care Center Shore Medical Center The Plastic Surgery Center Mid Atlantic Rehabilitation Mid Atlantic Rehabilitation Mid Atlantic Rehabilitation Mid Atlantic Rehabilitation
\$2,268.00 \$140.00 \$140.00 \$140.00 \$175.00 \$250.00 \$259.00 \$259.00 \$100.00 \$100.00 \$100.00 \$100.00 \$100.00 \$150.00	Charge \$46,552.00 \$15,191.00 \$471 \$125.00 \$400.00 \$350.00 \$150.00
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11/28/2014 Hospital Care	11/28/2014 Hospital Care	11/26/2014 Hospital Care	12/9/2014 Hospital Care	12/8/2014 Hospital Care	12/2/2014 Hospital Care	11/30/2014 Hospital Care	12/8/2014 Hospital Care	11/29/2014 Hospital Care	12/5/2014 Hospital Care	11/25/2014 Acute Rehabilitation								6/8/2015 Gait Training						6/3/2015 Therapeutic Exercises	6/1/2015 Gait Training	6/1/2015 Therapeutic Exercises							5/6/2015 PT Evaluation
Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	் Bacharach Institute்	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute	Bacharach Institute
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11/17/114 Mobile ICU 11/17/2014 Ambulance Total	6/18/2015 CT Upper Extremity	1/16/2015 MRI Upper Extremity	12/3/2014 X-Ray of the Abdomen	11/26/2014 Chest X-Rays	11/24/2014 Ultrasound Abdomen	11/23/2014 Chest X-Rays	11/22/2014 Chest X-Rays	11/21/2014 Chest X-Rays	11/20/2014 Chest X-Rays	11/19/2014 Shoulder X-Rays	11/19/2014 Chest X-Rays	11/19/2014 Chest X-Rays	11/17/2014 Shoulder X-Rays	11/17/2014 Exam Thoraic Aorta	11/17/2014 Artery X-Rays	11/17/2014 Placement Arterial Line	11/17/2014 CT Chest	11/17/2014 CT Lumbar	11/17/2014 CT Thoracic	11/17/2014 CT Cervical	11/17/2014 CT Abdomen/Pelvis	11/17/2014 3 D Rendering	11/17/2014 CT of the Head	11/17/2014 Chest X-Rays
AtlantiCare Care Regional AtlantiCare Regional Medical Exceptional Medical Transport	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging		Atlantic Medical Imaging	- 38		Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging	Atlantic Medical Imaging
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