



**IN THE GRAND COURT OF THE CAYMAN ISLANDS**

**CAUSE NO.      OF 2021**

**BETWEEN:**

**KENTON NEMBHARD**

**PLAINTIFF**

**AND:**

**THE ATTORNEY GENERAL OF THE CAYMAN ISLANDS**

**DEFENDANT**

**AND:**

**DEPARTMENT OF ENVIRONMENTAL HEALTH**

**INTERESTED PARTY**

**WRIT OF SUMMONS**

**TO:**

**AND TO:**

<b>Attorney General of the Cayman Islands</b> Office of the Attorney General 4 <sup>th</sup> Floor Government Admin Building 133 Elgin Avenue George Town, Grand Cayman	<b>Department of Environmental Health</b> Cayman Islands Environmental Centre 580 North Sound Road P.O. Box 1820 Grand Cayman KY1-1109 Cayman Islands
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THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs in respect of the claim set out on the next page.

Within 28 days after the service of the Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495, George Town, Grand Cayman, Cayman Islands, the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this 22 day of January 2021.

NOTE: - This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 months) beginning with the date of issue renewed by order of the Court.

**IMPORTANT**

Directions for Acknowledgment of Service are given with the accompanying form.

## **STATEMENT OF CLAIM**

1. Mr. Nembhard was a Solid Waste Driver's Assistant who was employed to the Defendant between April 27, 2008 and January 31, 2020.
2. The Interest Party is a Department of the Cayman Islands Government and is tasked with protecting the public from environmental health related hazards. Their methods include, but are not limited to waste collection, recycling and disposal.
3. The Interested Party is being sued through the Defendant, Attorney General, pursuant to section 11 of the Crown Proceedings Law (1997 Revision).
4. During Mr. Nembhard's employment to the Interested Party, he was instructed by the Interested Party to and did carry out the disposal of public waste by methods including the heavy lifting, pushing and pulling of garbage bins and bags daily for approximately eight (8) hours a day.
5. Mr. Nembhard thereby developed an injury to his right shoulder which was caused by the Interested Party's negligence:

### **PARTICULARS OF NEGLIGENCE**

- (a) Mr. Nembhard was directed and expected to lift, push and pull heavy garbage bags and bins by hand daily during his work time of eight (8) hours per day;
- (b) Despite the Interested Party knowing or despite the fact that they reasonably would have known the danger from excessive and repetitive heavy lifting, pushing and pulling of the said garbage bags and bins they failed to warn Mr. Nembhard of the said danger;
- (c) Failed to risk assess and implement a system that would reduce the exposure of Mr. Nembhard to the strain associated with the consistent and/or excessive heavy lifting, pushing and pulling demanded of him;
- (d) Failed to provide personal protective gear that would reduce and/or mitigate the strain placed on Mr. Nembhard and risk of during his course of employment including but not limited to a shoulder and back brace;

- (e) Failed to have regard for the working conditions and for the risks to the health and safety of persons, including Mr. Nembhard, doing work which consistently involved heavy lifting, pushing and pulling;
- (f) Failed to assess, adequately or at all, the health and safety risks posed by Mr. Nembhard's course of employment;
- (g) Failed to ensure that Mr. Nembhard had received adequate training for the purposes of health and safety, including training in the methods which may be adopted when engaging in heavy lifting, pushing and pulling, any risks which such activities may entail and precautions to be taken;
- (h) Failed to provide safe equipment, a safe place of work or a safe system of work.

#### **PARTICULARS OF INJURY**

- (a) Mr. Nembhard, whose date of birth is the 21<sup>st</sup> day of December 1973 and who is right hand dominant suffered severe shoulder pain and a rotator cuff injury to this right shoulder;
- (b) He suffers from pain and loss of mobility in his right shoulder, cannot sleep without the use of medication.

Further particulars of the Plaintiff's condition are contained in the General Practice Notes of Dr. Imilla Sedano-Barredo dated the 23<sup>rd</sup> of January 2018, the General Practice Notes of Dr. Courtney Maylor dated the 25<sup>th</sup> day of April 2018 the and other medical documents attached in the schedule.

Plaintiff reserves the right to obtain and serve further medical evidence.

#### **PARTICULARS OF SPECIAL DAMAGE**

**KYD\$**

Pain Suffering and Loss of Amenity


**To be assessed**

Loss of wages (11 months from February 1, 2020 to December 31, 2020 @ KYD\$2034.92/month – 11 months from February 1, 2020 to December 31, 2020 @ KYD\$850.00/month)	13,034.12
Loss of future earnings (18 years from January 1, 2021 to December 31, 2038 @ KYD\$24,419.04/year)	439,542.72
Loss of pension earnings (18 years @ KYD\$1,558.66/year)	28,054.08
<b>SUB- TOTAL</b>	<b>480,630.92</b>

6. Further, Mr. Nembhard claims interest upon such damages and amount found due pursuant to Section 34 of the Judicature Law 2017 or otherwise at such rate as this Honourable Court deems fit.

**AND** the Plaintiff claims:

- (a) Damages;
- (b) Loss of wages;
- (c) Loss of future earnings and handicap on the labour market;
- (d) Loss of pension earnings
- (e) Interest;
- (f) Costs;
- (g) Such further and/or other relief as this Honourable Court may deem fit.


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**CP ATTORNEYS**  
**ATTORNEYS-AT-LAW FOR THE PLAINTIFF**

## DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICES OF WRIT OF SUMMONS

1. The accompanying form of acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person.

After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statements of Claim" appear on the top of page 2) the Defence must be served within 28 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgement is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 28 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his defence within the appropriate time, the Plaintiff may enter judgement against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

**See over for notes for guidance  
Please complete overleaf**

## Notes for Guidance

1. Each Defendant (if there is more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 28 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Writ of Summons)"
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....) after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.



Notes on address for service

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communication for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Indorsement by Plaintiff's Attorney (or by Plaintiffs if suing in person) of his name, address and reference, if any, in the box below.

CP Attorneys  
325 Owen Robert's Drive  
2nd Floor, Andy's Rent-A-Car  
P.O. Box 561  
Grand Cayman KY1-1602  
Cayman Islands

Indorsement by Defendant's Attorney (or by Defendant if suing in person) of his name, address and reference, if any, in the box below.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS**

**CAUSE NO. OF 2021**

**BETWEEN:**

**KENTON NEMBHARD**

**PLAINTIFF**

**AND:**

**THE ATTORNEY GENERAL OF THE CAYMAN ISLANDS**

**DEFENDANT**

**AND:**

**DEPARTMENT OF ENVIRONMENTAL HEALTH**

**INTERESTED PARTY**

**SCHEDULE OF MEDICAL NOTES**

**IN THE GRAND COURT OF THE CAYMAN ISLANDS**

**CAUSE NO. OF 2021**

**BETWEEN:**

**KENTON NEMBARD**

**PLAINTIFF**

**AND:**

**THE ATTORNEY GENERAL OF THE CAYMAN ISLANDS**

**DEFENDANT**

**AND:**

**DEPARTMENT OF ENVIRONMENTAL HEALTH**

**INTERESTED PARTY**

**SCHEDULE OF MEDICAL NOTES**

Cayman Island Hospital  
95 Hospital Road  
P.O. Box 915  
Grand Cayman, KY1-1103



HEALTH SERVICES AUTHORITY  
CAYMAN ISLANDS  
Caring People. Quality Service.



### Transfer Document

Patient Name: **NEMBARD, KENTON**  
DOB/Age/Sex: 12/21/1973 46 years Male Consulting Dr:  
MRN: 00194384  
FIN #: 0004608444  
Admit Date: 1/23/2018 Attending Dr: SEDANO-BARREDO,IMILLA  
Disch Date: 1/23/2018

### General Practice Notes

Signed By:  
SEDANO-BARREDO,IMILLA (1/23/2018 10:18 EST)

#### Chief Complaint

Rt Shoulder pain

#### History of Present Illness

rt shoulder pain since this am after lifting heavy garbage bag. Pain on mobility

#### Review of Systems

no other complaints voiced

#### Current Medications

##### Home

No active home medications

#### Physical Exam

##### Vitals & Measurements

T: 36.6 °C (Oral) BP: 129/76

##### Physical Exam

alert, in no obvious distress  
rt shoulder no tenderness, good rom with some discomfort but full rom actively and passively  
no neurovascular deficit

#### Assessment/Plan

- Shoulder pain  
voltaren 50mg tds  
advised rest  
sick note x 3 days if worsen to return

#### Problem List/Past Medical History

##### Ongoing

Bronchitis

##### Historical

No qualifying data

#### Allergies

NKA

### Measurements

Date 1/23/2018

Time 08:21 EST

Measurements		Units
Height	171.00	cm
BSA	0	
Body Mass Index	0	kg/m2

**Cayman Island Hospital**  
95 Hospital Road  
P.O. Box 915  
Grand Cayman, KY1-1103



**HEALTH SERVICES AUTHORITY**  
CAYMAN ISLANDS  
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## Transfer Document

Patient Name: **NEMBARD, KENTON**

DOB/Age/Sex: 12/21/1973 46 years Male

Consulting Dr:

MRN: 00194384

FIN #: 0004714929

Attending Dr: MAYLOR, COURTNEY

Admit Date: 4/25/2018

Disch Date: 4/25/2018

### General Practice Notes

Signed By:  
MAYLOR, COURTNEY (4/25/2018 16:01 EST)

#### Chief Complaint

Rt shoulder pain since today

#### History of Present Illness

H/o partial tear to the right supraspinatus  
Patient present with pain in the right shoulder and decrease movement  
He had received injection in the are for pain before  
Works on truck and does heavy lifting,

#### Problem List/Past Medical History

##### Ongoing

Bronchitis

Diabetes

##### Historical

No qualifying data

#### Allergies

NKA

#### Review of Systems

Constitutional: Decreased activity.

Cardiovascular: Negative.

Gastrointestinal: Negative

Musculoskeletal: See HPC. No joint swelling, redness or warmth

Integumentary: No rash

Neurologic: No loss of sensation

#### Current Medications

##### Home

metformin

metformin 500 mg oral tablet, 1, PO, BID

sitagliptin, 50 mg, PO, Daily

#### Physical Exam

##### Vitals & Measurements

RR: 18 BP: 119/70 WT: 72.7 kg

##### Physical Exam

Constitutional: Well-nourished, no apparent distress

Neck: supple, nontender, no scars

Musculoskeletal: Right shoulder stiff, decrease ROM, tender in the right shoulder, nil joint effusion, nil increase warmth

Neurological: Nil loss of sensation, reflex normal

#### Assessment/Plan

1. Right shoulder pain

IM Toradol 60 mg stat

naproxen 500 mg po bdx 1 week

Voltarol gel aaa bdx 2/52

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## Transfer Document

Patient Name: **NEMBARD, KENTON**

DOB/Age/Sex: 12/21/1973 46 years Male

Consulting Dr:

MRN: 00194384

FIN #: 0004874729

Attending Dr: ONAH-EZEMA ,NGOZI GRACE

Admit Date: 9/18/2018

Disch Date: 9/18/2018

### General Practice Notes

Signed By:  
ONAH-EZEMA ,NGOZI GRACE (9/18/2018 10:00 EST)

#### Chief Complaint

Rt. shoulder pain

#### History of Present Illness

persistent pain Rt shoulder x ~2years

h/o partial tear of Rt supraspinatus tendon  
analgesics and intrarticular injection help temporarily

#### Problem List/Past Medical History

##### Ongoing

Diabetes

##### Historical

No qualifying data

#### Allergies

NKA

#### Lab Results

HGB A1C LAST

20/FEB/18 08:37 HgB A1c H 7.5 %

#### Review of Systems

Constitutional: No chills, No fatigue.

Eye: No recent visual problem.

Ear/Nose/Mouth/Throat: No decreased hearing.

Respiratory: No shortness of breath.

Cardiovascular: No chest pain.

Gastrointestinal: No nausea.

#### Current Medications

##### Home

metformin

metformin 500 mg oral tablet, 1, PO, BID

sitagliptin, 50 mg, PO, Daily

#### Physical Exam

##### Vitals & Measurements

T: 36.1 °C (Oral) RR: 24 BP: 114/78 WT: 72.7 kg

##### Physical Exam

Constitutional: Well looking, Nutrition adequate,

Mucous Membranes pink and moist, adequate hydration

Eyes: clear, no icterus

Rt Shoulder : restricted internal rotation

#### Assessment/Plan

Rotator Cuff injury

pain: Voltaren SR 100mg od x 1 week

Voltaren emugel

Ref Physiotherapy

Rpt MRI shoulder

DM - ?control

Rev with rpt a1c and Lipids

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## Transfer Document

Patient Name: **NEMBARD, KENTON**

DOB/Age/Sex: 12/21/1973 46 years Male

Consulting Dr:

MRN: 00194384

FIN #: 0004977162

Attending Dr: SEDANO-BARREDO ,KARLO

Admit Date: 12/18/2018

Disch Date: 12/18/2018

### General Practice Notes

Signed By:

SEDANO-BARREDO ,KARLO (12/18/2018 08:38 EST)

#### Chief Complaint: \_

pain rt shoulder

#### History of Present Illness:

\_chronic pain rt shoulder

Supervisor told to get sick note as he is unable to do his job properly

chronic rotator's cuff injury

had 2-3 injections rt shoulder --under orthopaedics

Receiving physion did not attend last session

Works as garbish collector

#### Review of Systems:

Constitutional: well developed, no apparent distress

#### Physical Exam:

Vitals: Noted

Constitutional: Well looking, Nutrition adequate, Mucous Membranes pink and moist, adequate hydration

Eyes: clear, no icterus

abduction normal ,internal rotation painful

no swelling shoulder ,no deformities

#### Assessment:

\_Rotators cuff partial tear since 2017 --chronic pain

#### Plan:

\_Arcoxia 90 mg po od

Refused im analgesia

Cayman Island Hospital  
95 Hospital Road  
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Grand Cayman, KY1-1103



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## Transfer Document

Patient Name: **NEMBHARD, KENTON**

DOB/Age/Sex: 12/21/1973 46 years Male

Consulting Dr:

MRN: 00194384

FIN #: 0005027564

Attending Dr: SEKHAR, KADIYALA

Admit Date: 2/4/2019

Disch Date: 2/4/2019

### Outpatient Physician Notes

Signed By:  
SEKHAR, KADIYALA (2/4/2019 10:05 EST)

#### Chief Complaint

2 year h/o pain in right shoulder.

#### History of Present Illness

Pain started after lifting a heavy drum at work.  
Pain is getting worse and is almost continuous.  
Night pain ++.  
No paraesthesias or hand weakness.

#### Review of Systems

Received shoulder injections twice in the past and the relief is short lived.

#### Physical Exam

Nontender AC joint.  
Abduction and rotations are painful and restricted.  
No neurovascular deficit.

#### Assessment/Plan

MRI done two years ago was suggestive of rotator cuff tear.  
Plan: Will refer to Dr. Rajaratnam for consult and management.

#### Problem List/Past Medical History

##### Ongoing

Bronchitis

Diabetes

##### Historical

No qualifying data

#### Procedure/Surgical History

Manual Therapy Techniques Treatment of  
Musculoskeletal System - Upper Back /  
Upper Extremity, Therapeutic Exercise  
Treatment of Musculoskeletal System -  
Upper Back / Upper Extremity using  
Electrotherapeutic Equipment.

#### Current Medications

##### Home

metformin

metformin 500 mg oral tablet, 1, PO, BID

sitagliptin, 50 mg, PO, Daily

#### Allergies

NKA

Cayman Island Hospital  
95 Hospital Road  
P.O. Box 915  
Grand Cayman, KY1-1103



HEALTH SERVICES AUTHORITY  
CAYMAN ISLANDS  
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## Transfer Document

Patient Name: **NEMBARD, KENTON**  
DOB/Age/Sex: 12/21/1973 46 years Male Consulting Dr:  
MRN: 00194384  
FIN #: 0005155673  
Admit Date: 5/25/2019 Attending Dr: WILLIAMS, PAUL  
Disch Date: 5/25/2019

### General Practice Notes

Signed By:  
WILLIAMS, PAUL (5/25/2019 09:57 EST); WILLIAMS, PAUL (5/25/2019 09:55 EST)

**Addendum by WILLIAMS, PAUL on 25 May 2019 09:57:07 EST**  
should read zofran 4 mg tid prn x 1wk

#### Chief Complaint

pain to rt arm post surgery

#### History of Present Illness

recurrent pain in rt shoulder after doing surgery to rt shoulder - rt rotator cuff injury

#### Current Medications

##### Home

Amaryl 2 mg oral tablet, 2 mg= 1 tab, PO, Daily  
metformin 500 mg oral tablet, 1000 mg= 2 tab, PO, BID  
sitagliptin, 100 mg, PO, Daily

#### Physical Exam

##### Vitals & Measurements

T: 36.9 °C (Oral) RR: 20 BP: 121/83

##### Physical Exam

rt arm restraint in splint

#### Assessment/Plan

1. Shoulder pain  
plan tramadol 50 mg tid x 1wk  
norflex  
zofran 50 mg bid x 1/52  
follow with orthopedic surgeon - from cayman orthopedic

#### Problem List/Past Medical History

##### Ongoing

Bronchitis  
Diabetes

##### Historical

No qualifying data

#### Procedure/Surgical History

Excision of Right Shoulder Joint,  
Percutaneous Endoscopic Approach,  
Inspection of Right Shoulder Region,  
Percutaneous Endoscopic Approach, Manual  
Therapy Techniques Treatment of  
Musculoskeletal System - Upper Back /  
Upper Extremity, Release Right Shoulder  
Tendon, Percutaneous Endoscopic  
Approach, Therapeutic Exercise Treatment of  
Musculoskeletal System - Upper Back /  
Upper Extremity using Electrotherapeutic  
Equipment, Therapeutic Exercise Treatment  
of Musculoskeletal System - Upper Back /  
Upper Extremity using Electrotherapeutic  
Equipment, Therapeutic Exercise Treatment  
of Musculoskeletal System - Upper Back /  
Upper Extremity using Electrotherapeutic  
Equipment, Therapeutic Exercise Treatment  
of Musculoskeletal System - Upper Back /  
Upper Extremity using Physical Agents.

#### Allergies

NKA

Result type: Private Physician Operative Notes  
Result date: 11 April 2019 13:05 EST  
Result status: Auth (Verified)  
Performed by: AYENI , OLUFEMI on 11 April 2019 13:20 EST  
Verified by: AYENI , OLUFEMI on 11 April 2019 13:20 EST  
Encounter info: 0005065738, GC, Day Cases, 11/Apr/2019 -

### OPERATIVE RECORD

**Preoperative Diagnosis:** \_right shoulder rotator cuff tear

**Postoperative Diagnosis:** \_right shoulder partial thickness rotator cuff tear and capsulitis

**Date of Operation:** \_april 11 2019

**Surgeon:** \_ayeni

**Assistant:** \_mohanty

**Anaesthetist:** \_gooden

**Anaesthetic Used:** \_general

**Operative Procedure:** right shoulder arthroscopy, rotator cuff debridement, capsule release, subacromial decompression

#### **Description of Procedure:**

Patient was brought to the operating room in stable condition, he had a general anaesthetic, was placed in beach chair position and received antibiotics. Operative shoulder was prepped and draped in sterile fashion with the help of skilled assistant. Standard posterior portal was created followed by anterior portal under direct visualization. Diagnostic arthroscopy revealed mild inflammation on biceps sheath, normal cartilage, intact rotator cuff tendon in all distributions. There were severe tendonitis noted on the supraspinatus and capsulitis noted in the anterior interval. The rotator cuff was debrided with cautery to reduce inflammation. An anterior capsule release was completed from 12 to 6 o'clock, while debriding capsulitis as well.. The labrum was normal and attached both anterior and posterior. The glenohumeral ligaments were intact.

The scope as inserted into the subacromial space. There was significant bursitis, some fraying of the infraspinatus and supraspinatus but this was partial thickness. The bursa was excised and rotator cuff debrided of frayed tissue. The acromion was also hooked with a frayed CA ligament. The CA ligament was recessed to the anterior margin of the acromion and an acromioplasty completed with

burr and shave to flatten the present spur. The subacromial space increased and final review of all cuff tendons revealed they were intact. The scope was removed, portals closed and sterile dressing applied. He was taken to recovery in stable condition. Plan is discharge home and follow with physiotherapy for range of motion in the next week.

—  
**Findings:as above**

—  
**Specimens Removed:nil**

—  
**Grafts/Implants:nil**

—  
**Estimated Blood Loss:minimal**

—  
**Blood Administered:Yes\_ No\_x**

—  
**Complications:nil**

—  
**Instrument, Swab and Needle Count Correct:Yesx\_ No\_**

**Postoperative Orders:**

(laboratory, radiology and treatment orders must be placed on the orders tab; medication orders on the Medication Record)

**Completed Action List:**

- \* Perform by AYENI , OLUFEMI on 11 April 2019 13:20 EST
- \* Sign by AYENI , OLUFEMI on 11 April 2019 13:20 EST
- \* VERIFY by AYENI , OLUFEMI on 11 April 2019 13:20 EST