

COMMONWEALTH OF KENTUCKY  
McCRACKEN CIRCUIT COURT  
CIVIL ACTION NO. 15-CI-00362  
DIVISION NO. I

ROXANNE PRIDEMORE

PLAINTIFF

v.

**EXPERT WITNESS DISLCOSURE OF**  
**STEVEN J. McCULLOUGH, D.O.**  
*(Electronically filed)*

MERCY HEALTH PARTNERS-LOURDES, INC.;  
D/B/A LOURDES HOSPITAL, INC.;  
STEVEN J. MCCULLOUGH, DO  
MERCY HEALTH PHYSICIANS KENTUCKY, LLC,  
D/B/A LOURDES PHYSICIAN SERVICES, LLC; AND  
JACKSON PURCHASE MEDICAL ASSOCIATES, PSC

DEFENDANT

Defendant, STEVEN J. McCULLOUGH, D.O., by counsel, and in accordance with the pre-trial order, discloses the following expert witnesses who may be called to testify at trial.

1. JOHN Q. A. MATTERN, III, D.O.- Dr. Mattern's CV is attached hereto. Dr. Mattern has reviewed the medical records of Larry E. Pridemore, the depositions taken to date in this matter, and based on his education, training and experience, is expected to testify that the care provided to Mr. Pridemore by Dr. McCullough met the standard of care expected of a reasonably competent physician under the same or similar circumstances. Mr. Pridemore was a 64 year old male with multiple medical issues and sought care from several medical providers in May 2014. He was admitted to Lourdes Hospital and became combative and agitated. He became a danger to himself and others. Dr. McCullough appropriately ordered restraints and the patient was monitored adequately. The patient was given appropriate medicines in the appropriate dosages to address the agitation. The patient apparently removed his restraints or was assisted in removing his restraints and oxygen. Despite this, his vital signs were generally normal and not indicative of any impending problem. The patient coded and without the benefit of an autopsy, it is not possible

to state within a reasonable degree of medical probability what caused his death. The actions of Dr. McCullough did not cause Mr. Pridemore's death and more likely than not, did not cause any significant respiratory distress. Dr. Mattern has reviewed the opinions of Dr. David Goldstein in plaintiff's expert witness disclosure and disagrees with the opinions about standard of care and causation.

2. Dr. Steven McCullough is expected to testify consistent with his deposition testimony and this may include expert opinions about Mr. Pridemore's conditions and treatments.

3. This defendant may rely upon the opinions of any experts disclosed by any other parties.

4. This defendant reserves the right to amend or supplement this disclosure as discovery proceeds. Pursuant to the Agreed Scheduling Order, the deposition of plaintiff's experts were to have occurred prior to the filing of this disclosure, and those depositions have not yet occurred.

Respectfully submitted

WHITLOW, ROBERTS, HOUSTON & STRAUB, PLLC  
*Attorneys for Steven J. McCullough, D.O.*

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**CERTIFICATE OF SERVICE**

I hereby certify that this 13<sup>th</sup> day of July, 2021, I electronically filed the foregoing with the Clerk of the Court by using the Kentucky Court of Justice e-filing website, which will send a notice of electronic filing to the following:

Paul A. Casi, II, Esq., [pac@casi-law.com](mailto:pac@casi-law.com), Jeff W. Adamson, Esq., [jadamson@casi-law.com](mailto:jadamson@casi-law.com), and Michael R. Hasken, Esq., [micheal@casi-law.com](mailto:micheal@casi-law.com), Paul A. Casi, II, PSC, 801 East Main Street, Louisville, KY 40206, *Attorneys for Plaintiff*; and

Richard L. Walter, Esq., Boehl, Stopher & Graves, LLP, 410 Broadway, Paducah, KY 42001, [rwalter@bsgpad.com](mailto:rwalter@bsgpad.com), [mclark@bsgpad.com](mailto:mclark@bsgpad.com), *Attorney for Mercy Health Partners – Lourdes, Inc. d/b/a Lourdes Hospital, Inc.*

/s/ E. Frederick Straub, Jr., Esq.  
E. Frederick Straub, Jr., Esq.

**John Q. A. Mattern, III, DO**  
**3005 Waverly Drive**  
**Charlottesville, Virginia 22901**  
**757.593.4225**  
**[jmattern@augustahealth.com](mailto:jmattern@augustahealth.com)**

## Experience

- July 2003-present **Hospitalist, Augusta Health**  
 78 Medical Center Drive, Fishersville, VA 22939. Office-540.332.4075.  
[jmattern@augustahealth.com](mailto:jmattern@augustahealth.com)
- 2014-present **Assistant Professor of Internal Medicine, Edward Via Osteopathic School of Medicine.** Blacksburg, VA.
- September 2008 -present **Medical Examiner for Augusta County and Cities of Waynesboro and Staunton**
- October 2010-present **Physician Advisor, EdiPhy Advisors/MedManagement, LLC**  
 Birmingham, AL. Responsible for addressing medical necessity for Medicare/Medicaid level of care issues for healthcare systems, retrospectively or concurrently. Have experience in representing clients at the Office of Medicare Hearings and Appeals/ALJ. Have experience working on corporate integrity agreements (CIA) and KPMG audits.
- October 2009-June 2010 **Hospitalist, Martha Jefferson Hospital, Charlottesville, VA. Locums Tenens**

## Residency

- June 2000-June 2003 **Johns Hopkins University/Sinai Hospital Internal Medicine Residency Program**  
 Baltimore, Maryland

## Education

- August 1996-June 2000 **Des Moines University**  
 Des Moines, Iowa. Doctor of Osteopathic Medicine
- January 1995-June 1996 **Virginia Commonwealth University/Medical College of Virginia**  
 Richmond, Virginia. Postgraduate Study
- August 1990-May 1994 **Lynchburg College**  
 Lynchburg, Virginia. B.S. Biology

## Honors

- 2001 **The Albert I. Mendeloff Research Award**  
 Awarded by the Department of Medicine, Division of Gastroenterology, for basic and clinical research in gastroenterology
- 1997 **Sigma Sigma Phi**  
 Medical Honor Society

## Certifications and Licensure

- Board Certified in Internal Medicine, August 2003. Recertified October 2013  
 Licensed in Virginia

**John Q.A. Mattern, III, DO****Publications**

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Mattern JQA, Barbul A. Human botfly. Am. J. Surg. 2003; 185:256-7.

Ghayee HK, Mattern JQA, Cooper DS. Dirty Nails. J. Clin. Endocrinol Metab. 2005; 90(4):2428.

Mishra R, Kaufman D, Mattern J, Dutta SK. Severe hyperphosphatemia and hypocalcemia caused by bowel preparation for colonoscopy using oral sodium phosphate in end-stage renal disease. Endoscopy. 2005;37:1259.

**Research**

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**Clinical Research**

Georgia Vogelsang, MD, Professor of Oncology. Research Mentor. A retrospective study evaluating non-infectious pulmonary complications after hematopoietic stem cell transplantation.

**Clinical Research**

Sudhir K. Dutta, MD, Research Mentor. Retrospective study evaluating risk factors for diverticulitis. Abstract accepted for the American College of Gastroenterology 66<sup>th</sup> Annual Scientific Meeting, Las Vegas, Nevada, October 2001.

**Committees**

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Ethics Committee, Chairman 2008-2010.

Augusta Care Partners, Finance Committee Chair, January 2021-current

**CME Presentations and Lectures**

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July 16, 2009. Advance Directives: Problems and Pitfalls

October 18, 2017. Guest Lecturer. Murphy Deming College of Health Sciences at Mary Baldwin University, Staunton, VA Topic-Acute and Chronic Renal Failure, SIADH

June 6, 2018. Guest Lecturer. Murphy Deming College of Health Sciences at Mary Baldwin University, Staunton, VA. Topic-Respiratory Disease

**Civic Endeavors**

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Albemarle County Forestry and Agricultural Committee Member, 2007-2011, Vice Chair -2011

Charlottesville-Albemarle Airport Commission Member-May 2020-current. January 2021, Vice Chair-current