BODYFELT MOUNT STROUP CHAMBERLAIN K. Attorneys at Law E. Richard Bodyfelt Barry M. Mount Roger K. Stroup Peter R. Chamberlain February 2, 1983 229 Mohawk Building 222 S.W. Morrison St. Re: See v. Remington Portland, Oregon 97204-3188 Telephone 503 243-1022 Mr. James Huegli Attorney at Law 1200 Standard Plaza Portland, OR 97204 Enclosed you will find the document(s) listed below for: (XX) Your information () Your review () Judge's signature) Filing () Recording () Response to request) Your signature) Other: ſ () Affidavit) Notice of Deposition Enc: (

) Answer) Order (() Check) Petition () Complaint) Praecipe) Confirmation card) Reply (Please complete & return.)) Request) Cost Bill) Response) Decree) Satisfaction of Judgment) Judgment) Sheriff's Return of Service () Memorandum) Writ of Garnishment () Motion (A copy of a recent report, with enclosures, which (XX) Other:

I received from Dr. Perrin.

Action requested:

() Please contact this office after review.

- () Please acknowledge receipt.
- () Take appropriate action.
- () Return the above to this office.

BODYFELT, MOUNT, STROUP & CHAMBERLAIN

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Peter R. Chamberlain

Peter R. Chamberlain

PRC/sak Enclosure

EUGENE R. PERRIN, M.D., P.C. PHYSICIAN AND SURGEON

Plastic & Reconstructive Surgery Surgery of the Hand

January 19, 1983

Peter R. Chamberlain Bodyfelt, Mount, Stroup and Chamberlain 214 Mohawk Building 708 S.W. Third Avenue Portland, Oregon 97204

RE: Teri See

Dear Mr. Chamberlain:

I examined Terri today as planned. She has showed remarkable improvement in the quality of the scars of both legs since my last opportunity to see her in 1980. However, she still has extensive defects which will leave permanent scarring, as you are well aware. Specifically, the right leg shows evidence of massive soft tissue loss in the posterior medial aspect with a well healed oblique scar. The tissues are soft and not sensitive. There is some area of diminished sensory perception over the right knee area, but the sensation of the lower leg and foot is intact. The knee shows full range of motion and is stable. The left leg shows a well healed skin grafted area and the transverse scar where a portion of this area had been previously excised by me. There are no associated sensory defects or significant muscle weakness. She describes difficulty in kneeling, particularly because of the sensitivity of the right knee and is unable to carry on normal running and athletic efforts because of the weakness of the left leg.

Although there has been remarkable improvement since the time of the initial injury there is still a possibility of some further correction to the left leg in an effort to fill in the loss of muscle bulk and skin. This would require a myocutaneous pedicle from the back of the same leg, transferring the muscle mass for bulk only - not for strength. Further staged excisions of the grafted area on the left leg could also be considered in an effort to reduce the involved area. The myocutaneous flap is somewhat involved and would require a period of hospitalization of probably a week to ten days with a prolonged convalescence in the range of one month. It is difficult to estimate overall medical costs involved, but considering current hospital costs

continued -

2363 N.W. FLANDERS

PORTLAND, OREGON 97210

(503) 228-5432

January 19, 1983

Page Two

Re: Teri See

a range of \$25,000 to \$30,000 would not be inappropriate. Even if this were done permanent scarring in the area would remain. This would serve to correct the marked depression and shortage of skin in the lower thigh.

I have tentatively scheduled out the afternoon of March 2nd and expect to hear from you prior to that date for any further details of Teri's case and confirmation of the trial date. I am enclosing with this letter a copy of my chart notes and operative note.

Sincerely yours,

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Eugene R. Perrin, M.D., P.C.

ERP:bbs enclosures

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ST. VINCENT HOSPITAL AND MEDICAL CENTER

**5.**, Teri Rae 5.3858 362-2 Dr. E. Perrin Adm Date: 7/15/80

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## **Operative Record**

DATE OF SURGERY: 7/16/80

**PREOP DIAGNOSIS:** Severe scar deformity of the legs bilaterally, post high velocity missile wound.

POSTOP DIAGNOSIS: Same.

OPERATION: Release, scar contracture, and scar division of the lower legs, with local advancement flaps.

SURGEON(S): Dr. E. Perrin

Under satisfactory general anesthesia the legs were prepared and draped in an appropriate manner. A large defect in the left anterior thigh and a much larger defect with soft tissue loss of the medial aspect of the lower right thigh was present. The areas had been resurfaced with skin graft, but contracture was present. After proper positioning the local tissues were infiltrated with a mixture of 1/4% Xylocaine and 1/2% Xylocaine with Adrenalin.

The incisions were made delineating the area of tissue loss. The old skin graft was resected from the medial aspect of the right thigh and local flaps were developed widely for advancement. Muscle insertions were freed and rotated for closure of the deep cavity. The flaps were then advanced and closed with multiple #00 and #000 Vicryl and #4-0 nylon. A partial excision of the grafted area of the right thigh was then done to minimize this defect. The wound was sutured with multiple #4-0 nylon.

Following this, bulky compressive dressings were applied to both areas. A posterior plaster splint was used to immobilize the right knee area. The patient was sent to the R. R. in satisfactory condition. The estimated blood loss was less than 200 cc.

Dictated by E. Perrin, M. D. 7/16/80 Transcribed by md 7/18/80

cc: Dr. E. Perrin