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To Whom It May Concern,

**RE: Recommendation For Patrick J. Regan, D. O. As Expert Medical Witness**

Ladies & Gentlemen:

To those attorneys or doctors who are considering retaining an expert witness or consultant in the fields of Peer Review methodology, Fair Hearing evaluation, MEC procedures, Medical Staff Bylaw adherence, and/or evaluation of National Practitioner Data Bank reports, I wholeheartedly endorse Patrick J. Regan, D.O. Regardless of whether your knowledge in these fields is in its infancy or is well advanced, Dr. Regan will expand your insight, direct your discovery, uncover relevant facts, refine your analysis of the material facts, and embellish your presentation of the key elements of your case. Your search for an expert in these areas should stop with him.

On behalf of a young, talented and highly credentialed laparoscopic surgeon I retained Dr. Regan on February 21, 2022 to act as an expert to testify on behalf of my client at a jury trial on the issues of whether the hospital's MEC and peer review process complied with the hospital's own peer review policy and bylaws and, if not, whether it satisfied the applicable standards for such a proceeding or breached those standards in the application of them (1) in suspending my client's surgical privileges, (2) in preventing him from timely obtaining the asserted retraining to restore his privileges, and (3) in preparing and submitting an adverse NPDB Report against him.

This is not a field of law in which I regularly practice. I worked with Dr. Regan through the time that we settled the case in April, 2023. Dr. Regan digested vast quantities of documents and discovery data to drill down to key facts and issues that helped me investigate further as discovery progressed. In the process he compiled an extensive chronological record of precisely

what occurred as compared to what should have occurred in a proper good faith peer review that adhered to substantive due process. His analysis enabled me to focus questions on specific areas and weaknesses in depositions that we took of hospital administrators and physicians. His expert report was thorough, well written, and persuasive.

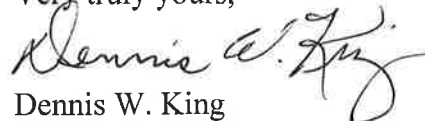
Dr. Regan was always quick to respond and readily available to communicate either in writing or by telephone. Because of his extensive knowledge of these fields, he is a fast study in reviewing depositions and peer review documentation. His efficiency and skill more than justifies his fees. He is particularly adept at ferreting out disingenuous or defective procedures aimed at falsely harming or injuring a physician's career or practice. As such, he is a champion for the maligned, mistreated, or discredited physician who has become a victim of a defective peer review who feels trapped by the system.

For various reasons some cases are better settled than tried and Dr. Regan went out of his way to assist me in negotiating a settlement agreement that substantially cleared my client's record with the NPDB of false or unsupported charges that the litigation discovery had disclosed. By enabling us to have such unsupported or questionable statements in the NPDB report removed or modified through settlement negotiations (where years of litigation were achieving minimal effect) to comport with what actually occurred, the final report should have little impact on my client's future career.

In doing so, my client's record with the NPDB was demonstrably improved. After six years of being out of work my client is now employed as a surgeon on a full-time basis in a hospital in which he has continued to help patients. Without Dr. Regan advising me on settlement issues and when and where to push or hold back, it is unlikely that we could have achieved a settlement with a modified or corrected NPDB report of the same quality that we obtained. I can not thank Dr. Regan enough for having helped a gifted surgeon return to his care and treatment of many patients hereafter.

If you require any other information about Dr. Regan, do not hesitate to email or call me.

Very truly yours,

A handwritten signature in cursive script that reads "Dennis W. King". The signature is written in black ink and is positioned above the printed name.

Dennis W. King