



# Scopelitis

Garvin Light Hanson & Feary

The Transportation Law Firm

Pam Balaam v. Nikolai Volkhov  
Case No. 24-6812-DUH-15  
Hon. Judge David Hooper

# Plaintiff Exhibit A: Photos



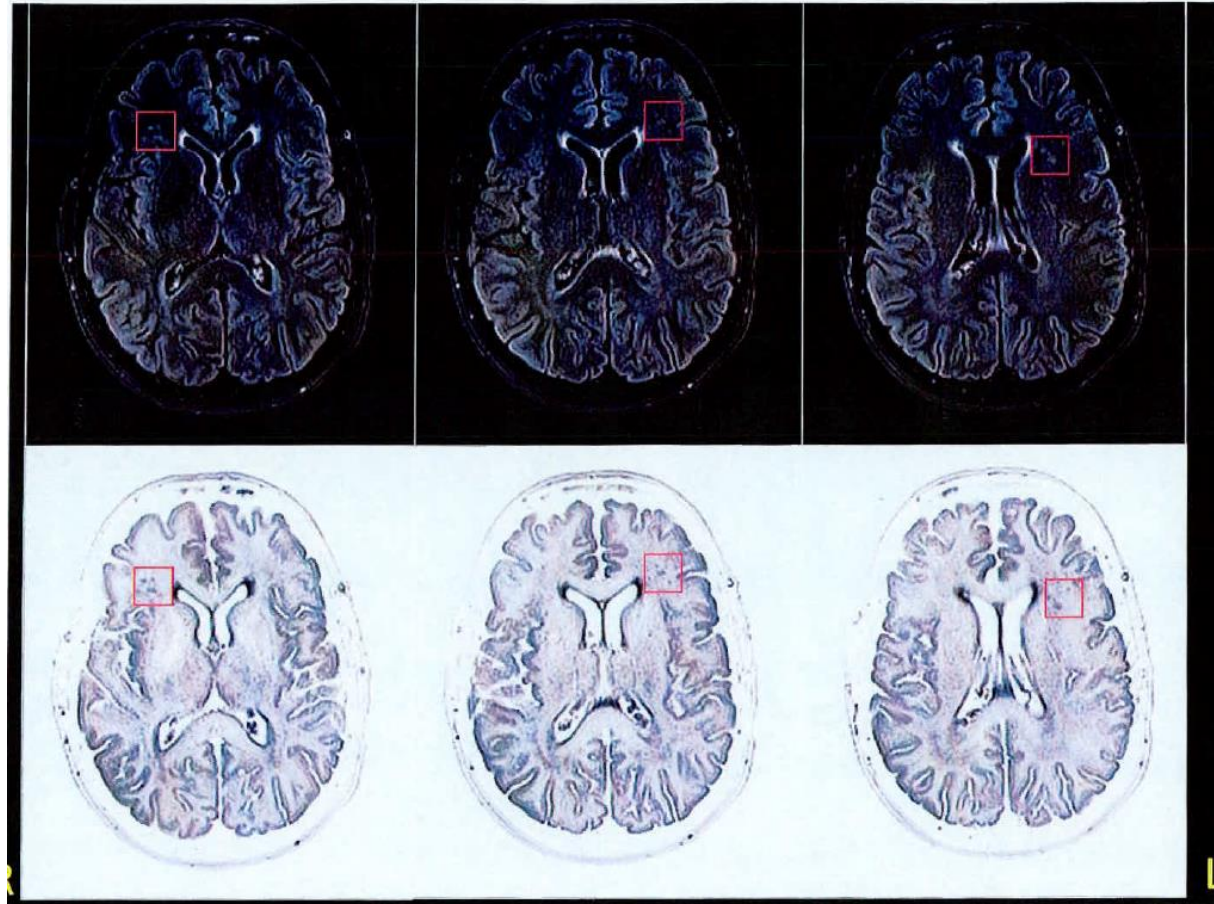
# Plaintiff Exhibit A: Photos



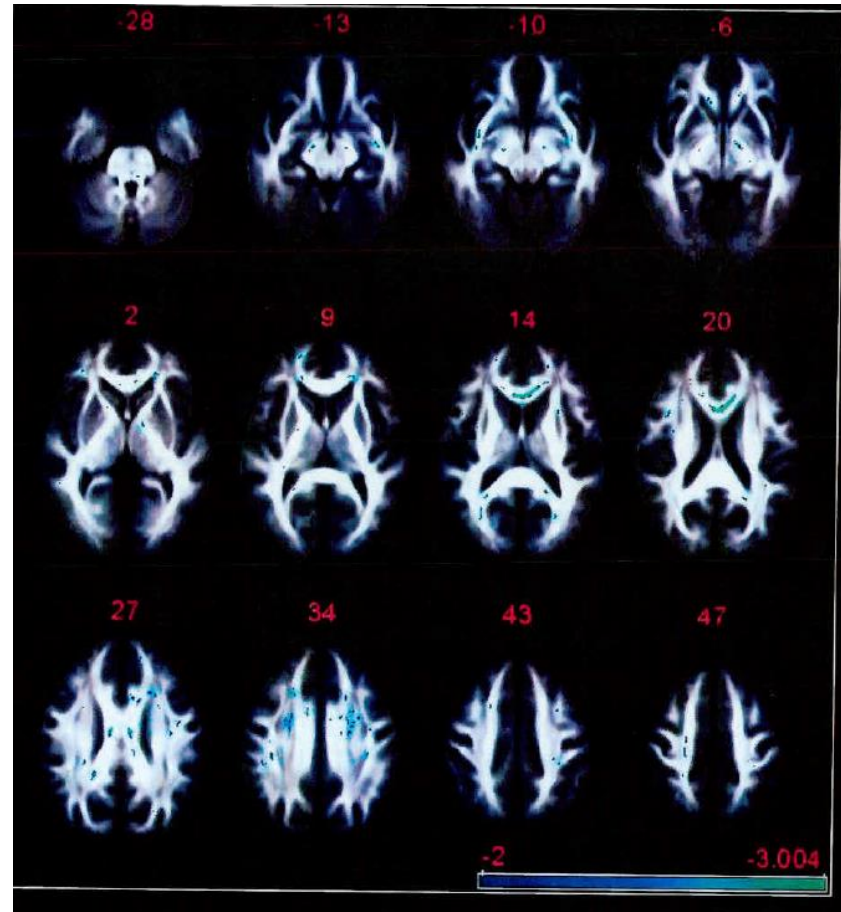
# Plaintiff Exhibit A: Photos



# Plaintiff Exhibit B: DTI Imaging



# Plaintiff Exhibit B: DTI Imaging



# Plaintiff Exhibit C: Neuropsych Results

## DIAGNOSIS:

1. **Mild Neurocognitive Disorder due to Traumatic Brain Injury affecting:**
  - **Visual and complex attention**
  - **Verbal new learning and short-term memory**
  - **Visual short-term memory**
  - **Executive functions (i.e. response inhibition, abstract reasoning, new learning)**
  - **Motor functions**
2. **Major Depressive Disorder, chronic**

# Plaintiff Exhibit C: Neuropsych Results

**The pattern of findings on neuropsychometric testing is consistent with a Mild Neurocognitive Disorder subsequent to a Traumatic Brain Injury as well as persistent postconcussive syndrome (with the inclusion of ongoing headaches, imbalance, nausea, fatigue, irritability). Specifically, there have been clinically significant impairments in executive functions, attention, short-term memory, and motor function that impacts day-to-day life. Overall, in these domains, she will be functioning at a much lower level than her peers.**



# Defense Exhibit 1: Photos



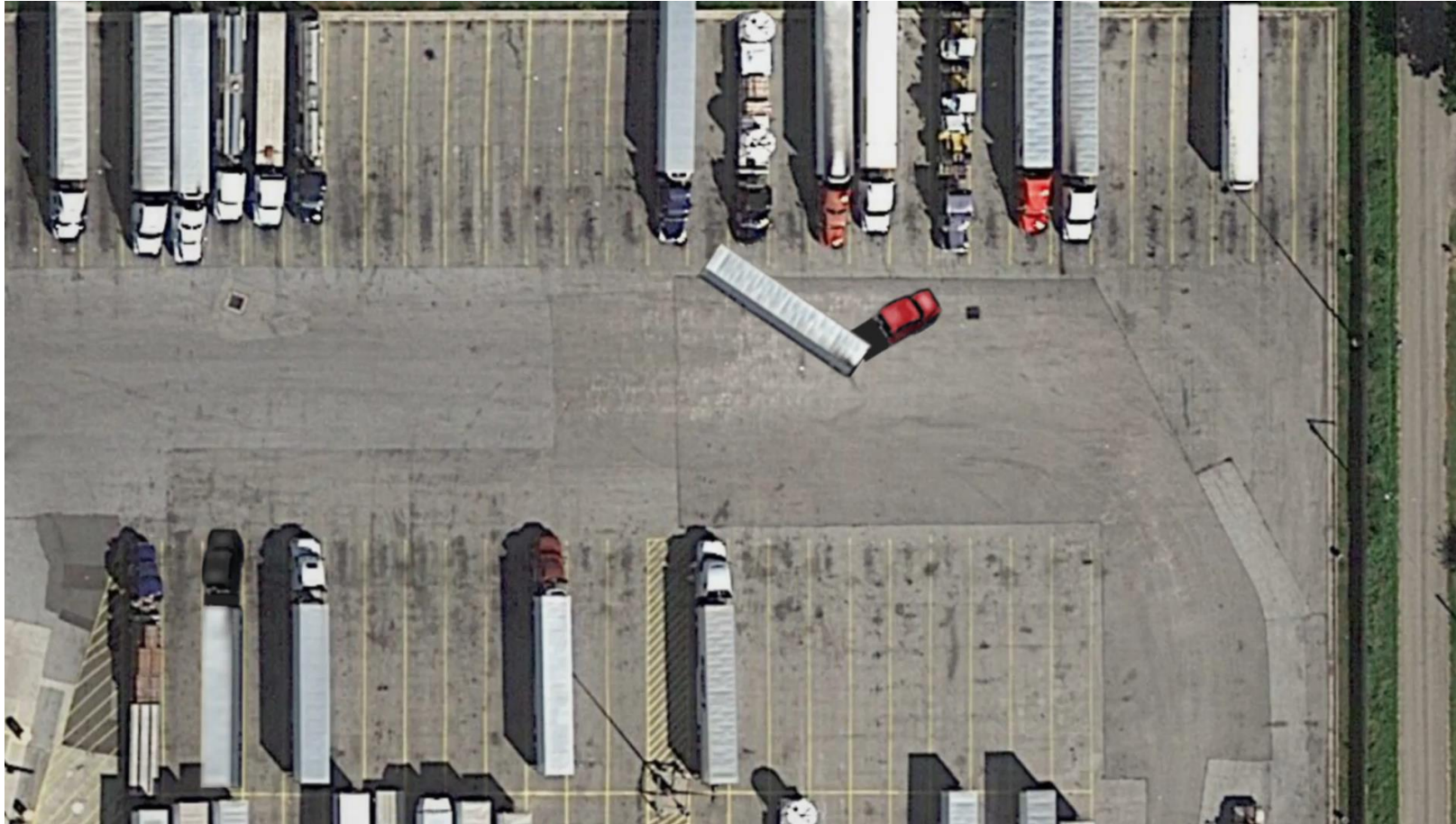
# Defense Exhibit 1: Photos



# Defense Exhibit 1: Photos



# Defense Exhibit 2: Recreation Graphics



# Verdict Form

JUDICIAL HELLHOLE COUNTY  
SUPERIOR COURT

PAM BALAAM, Plaintiff, va. NIKOLAI VOLKHOV, Defendant.	CASE NO.:
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VERDICT FORM

We, the jury, answer the questions submitted as follows:

1. Is Defendant Nikolai Volkhov negligent? \_\_\_\_\_. If you answered no, you need not go further. If you answered yes, proceed to question 2.
2. Is Pam Balaam negligent in this accident? \_\_\_\_\_. If yes, please proceed to question 3. If no, please proceed to question 4.
3. What percentage of liability do you allocate to Pam Balaam and what percentage to Nikolai Volkhov?
  - a. Pam Balaam: \_\_\_\_\_ %
  - b. Nikolai Volkhov: \_\_\_\_\_ %
  - c. If the % for Pam Balaam is 51% or greater, you need not proceed further.
4. What damages, if any, did Pam Balaam suffer in this motor vehicle accident?

- a. \$ \_\_\_\_\_ .00
- b. You may break down any damages award into categories, including medical expenses, lost wages, loss of earning capacity, and pain and suffering.
- c. If you are reducing by any percentage of comparative fault pursuant to Question 3, please provide the adjusted figure here: \$ \_\_\_\_\_.

VERDICT

- a. We rule in favor of Defendant.
- b. We rule in favor of Plaintiff in the amount of \$ \_\_\_\_\_ .00

# Was Mr. Volkhov Negligent?

- Evidence:
  - Ms. Balaam positioned to back tractor-trailer into spot
  - Mr. Volkhov waiting; eventually proceeded past
  - At time of impact Mr. Volkhov's tractor had already cleared Ms. Balaam's trailer
  - No evidence of speeding/uncontrolled driving
  - No eyewitnesses
- Conclusion: Defense Verdict

# Damages

- Evidence:
  - Minimal property damages; less than \$1,000
  - Ms. Balaam walking and seemingly unhurt
  - Ms. Balaam completed her trip
  - No loss of consciousness or post-traumatic amnesia
  - Mild TBI? But no MRI evidence
- Conclusion: Minor Accident, Minimal Damage

# Damages

- **Monetary Award?**
  - Dr. Shrink? No objective evidence of alleged brain injury causing issues for Ms. Balaam
  - Dr. Jenkins? Forces insufficient to cause TBI
  - Medical expenses? ER visit?
- **Fair Verdict? \$15,000 - \$25,000**



The logo consists of a stylized globe icon on the left, featuring a grid of latitude and longitude lines. A white, curved, ribbon-like shape wraps around the globe from the bottom left towards the top right. To the right of the globe is the word "Scopelitis" in a bold, white, sans-serif typeface.

**Scopelitis**