



The National Trial Competition

2026 National Case Problem

STATE OF LONE STAR
v.
CHRISTOPHER LUDDOCK

Prepared by:

Roberta Flowers
Judge John Madden
Adam Shlahet

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and
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February 23, 2026

Dear Regional Champion Students and Coaches,

Welcome to this year's National Trial Competition. You have earned your place here through talent, discipline, and a willingness to put in the work when it counts. Now the real work begins.

Success in trial advocacy is rarely about flashes of brilliance. It's about preparation that runs so deep you can think clearly under pressure. It's about mastering the record, anticipating the unexpected, and supporting your teammates with consistency and professionalism. Judges notice the details — organization, timing, courtroom demeanor, and respect for opposing counsel. Those habits will distinguish you just as much as your arguments.

Approach every round with intensity and integrity. Treat every witness as real, every objection as consequential, and every moment in the courtroom as a reflection of your character. Work hard for each other. Compete fiercely, but always with civility.

This year's problem is based on the current issues surrounding the balancing of individual's rights to protest and public safety. We included some video and an "original" song. We hope you will find it challenging and fun. A special thanks to Dr. Mark Curato for lending us his medical expertise.

As always, we welcome questions and ideas for improving the case – especially ideas that are "lucid, intelligent, and well thought-out." 😊 Please use the questionnaire circulated by TYLA.

Have fun and good luck!

Sincerely,

Bobbi, Adam, and Judge Madden

P.S. Everything contained in this case file has been created for the sole purpose of educating law students.

**IN THE 51ST DISTRICT COURT
IN AND FOR LONE STAR COUNTY**

STATE OF LONE STAR	&	CASE NO. 367-REG-CR
	&	
v.	&	
	&	
CHRISTOPHER LUDDOCK,	&	INDICTMENT
	&	
<i>Defendant.</i>	&	
	&	

COUNT 1

The undersigned, being sworn says, on information and belief, that CHRISTOPHER LUDDOCK did, in the County of Lone Star, on or about June 15, 2025, commit AGGRAVATED ASSAULT, a violation of section 67.167 of the Lone Star Penal Code, in that said defendant caused bodily injury to VICTORIA PEREZ; and the defendant did this intending to cause bodily injury; or knowing that he would cause bodily injury; or with recklessness about whether he would cause bodily injury; and the defendant, during the alleged assault, used an automobile.

COUNT 2

The undersigned further deposes and says on information and belief, that CHRISTOPHER LUDDOCK did, in the County of Lone Star, on or about June 15, 2025, commit LEAVING THE SCENE OF AN INCIDENT WITHOUT REPORTING WITH PERSONAL INJURY, a violation of section 167.67(c) of the Lone Star Penal Code, in that said defendant, operated a motor vehicle; and the defendant knew or had cause to know that personal injury had been caused to VICTORIA PEREZ, due to an incident involving the motor vehicle operated by the defendant; and that the defendant did not, before leaving the place where the said personal injury occurred, stop, exhibit his driving documentation to the injured party, if practical, and also to a police officer, or in the event that no police officer was in the vicinity of the place of said injury, then he/she did not report said incident as soon as physically able to the nearest police station or judicial officer.

Subscribed and sworn before me,
Monday, June 18, 2025

Gaylord Furguson III
Gaylord Furguson III
Deputy District Attorney
Lone Star County District Attorney

**IN THE 51ST DISTRICT COURT
IN AND FOR LONE STAR COUNTY**

STATE OF LONE STAR

v.

CHRISTOPHER LUDDOCK

Defendant.

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CASE NO. 367-REG-CR

**RULING ON MOTION TO STRIKE
DEFENSES**

THIS MATTER comes before the Court on the State’s Objection to and Motion to Strike the Defendant’s Affirmative Defenses. Having considered the affidavits submitted by the parties and the testimony of the witnesses presented at a hearing on the issue, the Court finds and rules as follows:

The defendant has asserted three affirmative defenses: necessity, self-defense, and defense of property. In the State of Lone Star, a criminal defendant has the burden of proving affirmative defenses at trial by a preponderance of the evidence. As set forth in *Trevino v. State*, 976 Lone Star Crim. 121 (L.S. Crim. App. 2001), before a defendant may assert an affirmative defense at trial, the Court must first rule as a matter of law whether the claimed facts and circumstances, if established, would be sufficient to constitute a justification for the defendant’s criminal conduct. Stated another way, a defendant must demonstrate prior to trial that there is sufficient evidence to establish a prima facie case. Additionally, for any of the affirmative defenses in this case to apply, the defendant’s conduct must otherwise be criminal. Accordingly, the assertion of any of the affirmative defenses at trial necessarily constitutes an admission that the defendant engaged in the charged conduct. *Trevino* at 125.

Although the prosecution presented evidence at the hearing that challenged the veracity of the defendant’s evidence, the question before the Court is whether the evidence, when viewed in the light most favorable to the defense, is of a sufficient degree and of such nature that a reasonable jury could find that the elements of the affirmative defenses have been proven by a preponderance of the evidence. In this case, the defendant has made such a showing with regard to his defense of necessity. However, the evidence, even in the light most favorable to the defense, cannot show that the defendant was reasonably in fear of imminent bodily injury at the time he drove over the victim. Similarly, with regard to defense of property, the threat to property must be happening or about to happen immediately. Although the defendant’s travel was blocked, no actual damage was being inflicted upon the vehicle and there was no evidence that anyone was about to do so.

For the reasons stated above, the State's Objection to and Motion to Strike the Defendant's Affirmative Defense of Necessity is GRANTED IN PART and DENIED IN PART. The defendant may present evidence of the affirmative defense of necessity. He may not, however, claim self-defense or defense of property.

So ORDERED, this 11th day of December, 2025

Melville Gerry

Melville Gerry
District Judge

IN THE 51ST DISTRICT COURT
IN AND FOR LONE STAR COUNTY

STATE OF LONE STAR

&

CASE NO. 367-REG-CR

&

v.

&

PRETRIAL ORDER

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CHRISTOPHER LUDDOCK,

&

Defendant.

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Witnesses

The State bears the burden of proving the charges against the defendant in the first instance. The defendant, however, is asserting the affirmative defense of necessity, and the State will call an additional witness to further rebut the affirmative defense. The State may not call its rebuttal witness until after the defense case in chief.

Accordingly, the call order of the witnesses will be:

- Jordan Copeland – prosecution witness
- Robin Washington and Dr. Kiran Kahn, in either order – defense witnesses
- Kyle Dillman – prosecution rebuttal witness

Exhibits

The parties may seek to admit the following exhibits at trial:

Exhibit 1 – video of incident	Exhibit 12 – map of downtown Odessa, Lone Star
Exhibit 2 – video of incident	
Exhibit 3 – still frame from exhibit 1	Exhibit 13 – map of blocks near medical center showing one-way streets
Exhibit 4 – still frame from exhibit 1	Exhibit 14 – Regional Medical Center records for Robin Washington
Exhibit 5 – still frame from exhibit 1	Exhibit 15 – diagram of Little Bear Pub
Exhibit 6 – still frame from exhibit 1	Exhibit 16 – diagram of Little Bear Pub with markings
Exhibit 7 – still frame from exhibit 1	
Exhibit 8 – still frame from exhibit 2	Exhibit 17 – song lyrics
Exhibit 9 – still frame from exhibit 2	Exhibit 18 – CD cover
Exhibit 10 – map of Odessa, Lone Star	Exhibit 19 – audio recording
Exhibit 11 – map of Odessa, Lone Star with travel routes	

Stipulations

1. All witnesses are gender neutral.
2. The Defendant will be constructively seated at the defense table and may be assumed to be wearing a gray suit and blue tie for purposes of identification.
3. Jury Instructions may not be amended, and they will be read constructively only to the jury before closing arguments.
4. The witness affidavits were submitted to the court in connection with the State's Motion to Strike the Defendant's Affirmative Defenses.
5. The transcript sections are selected portions from the transcripts of the witnesses' testimony given under penalty of perjury at the hearing on the Motion to Strike. The transcript sections are accurate recitations of the portions of the testimony but do not include all of the testimony given by those witnesses at the hearing.
6. All exhibits are accurate and authentic, and they show what they purport to show.
7. Exhibit 14, the medical records for Robin Washington, are admissible.
8. The Lone Star Medical Center is labeled as "Regional Medical Center" in exhibits 10 through 13. Medical Center Hospital is a separate facility from the Lone Star Medical Center.
9. Victoria Perez suffered bodily injury in the form of a broken leg caused by the Defendant's 2014 Kia Forte driving over her legs on June 15, 2025. Victoria Perez later passed away in October 2025 from an illness that was unrelated to the events on June 15.
10. All constitutional issues have been raised and resolved, and no objections will be made or entertained on constitutional grounds.
11. Jordan Copeland is familiar with and can testify regarding exhibits 1 through 10, 12, and 13. Robin Washington is familiar with and can testify regarding all exhibits. Dr. Kiran Khan is familiar with and can testify regarding exhibit 14. Kyle Dillman is familiar with and can testify regarding exhibits 10, 12, 13, and 15 through 19.
12. The song in exhibits 17 and 19 is a modified version of a different song. The parties agree that they will not reference the original version of that song or its lyrics.

**IN THE 51ST DISTRICT COURT
IN AND FOR LONE STAR COUNTY**

STATE OF LONE STAR

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CASE NO. 26-REG-CR

v.

CHRISTOPHER LUDDOCK,

JURY INSTRUCTIONS

Defendant.

Jury as Fact Finder

As jurors, you review the evidence and determine the facts and what they prove. You judge the believability of the witnesses and what weight to give their testimony.

Presumption of Innocence

The Defendant is presumed innocent of all charges. The law does not require a defendant to prove his innocence or produce any evidence.

Evidence

“Evidence” includes testimony of witnesses, exhibits admitted into evidence, stipulations, and anything else I told you to treat as evidence. The attorneys’ remarks and questions are not evidence. If I sustained an objection, ignore the question. If I ordered testimony stricken, disregard it. During the trial, you were told that both parties agreed, or stipulated, to certain facts. Because there is no dispute about those facts you must also accept them as true.

Witnesses

You will have to decide if you believe each witness. You may believe all, part, or none of a witness’s testimony. You may consider, among other factors, the following:

1. How well did the witness see, hear, or sense what the witness described in court?
2. How well did the witness remember and describe what happened?
3. How did the witness look, act, and speak while testifying?
4. Did the witness have any bias, motive, or incentive to say something that was not true?
5. Was the witness’s testimony consistent with other things the witness said?

Defendant’s Right Not to Testify

The Defendant has an absolute constitutional right not to testify. Do not consider, for any reason at all, the fact that the Defendant did not testify.

Motive

The State is not required to prove that the Defendant had a motive to commit any of the crimes charged. In reaching your verdict you may, however, consider whether the Defendant had a motive. Having a motive may be a factor tending to show that the Defendant is guilty. Not having a motive may be a factor tending to show the Defendant is not guilty.

Elements of Aggravated Assault

In order for you to find the Defendant guilty of the crime of Aggravated Assault, the State is required to prove, from all of the evidence in the case, beyond a reasonable doubt, each of the following three elements:

1. The Defendant, in Lone Star County, Lone Star, on or about June 15, 2025, caused bodily injury to Victoria Perez; and
2. The Defendant did this either
 - a. intending to cause bodily injury; or
 - b. knowing that he would cause bodily injury; or
 - c. with recklessness about whether he would cause bodily injury; and
3. The Defendant, during the alleged assault, used an automobile

You must all agree on elements 1, 2, and 3 listed above, but you do not have to agree on the specific culpable mental states listed in elements 2.a, 2.b, and 2.c above so long as each of you finds that at least one was proven beyond a reasonable doubt.

A person intentionally causes bodily injury to another if it is the person's conscious objective or desire to cause the bodily injury to another.

A person knowingly causes bodily injury to another if the person is aware that the person's conduct is reasonably certain to cause the bodily injury to another.

A person recklessly causes bodily injury to another if the person is aware of but consciously disregards a substantial and unjustifiable risk that the person's action will cause bodily injury to another. The risk must be of such a nature and degree that its disregard constitutes a gross deviation from the standard of care that an ordinary person would exercise under all the circumstances as viewed from the actor's standpoint.

Elements of Leaving the Scene of an Incident without Reporting

In order for you to find the Defendant guilty of the crime of Leaving the Scene of an Incident without Reporting with Personal Injury, the State is required to prove, from all of the evidence in the case, beyond a reasonable doubt, each of the following three elements:

1. The Defendant, in Lone Star County, Lone Star, on or about June 15, 2025, operated a motor vehicle;
2. At that time and place, the Defendant knew or had cause to know that personal injury had been caused to another person, due to an incident involving the motor vehicle operated by the defendant; and
3. The Defendant did not, before leaving the place where the said personal injury occurred, stop, exhibit his driving documentation to the injured party, if practical, and also to a police officer, or in the event that no police officer was in the vicinity of the place of said

injury, then he/she did not report said incident as soon as physically able to the nearest police station or judicial officer.

You must all agree on elements 1, 2, and 3 listed above.

Defense of Necessity

The Defendant has asserted the defense of necessity. Conduct which would otherwise constitute a criminal offense is justified and not criminal if:

1. the Defendant found himself in a situation that reasonably induced within him a fear of death or serious bodily injury to another;
2. the Defendant did not recklessly or negligently place himself in that situation;
3. the Defendant's conduct was necessary as an emergency measure to avoid the death or serious bodily injury feared by the Defendant; and
4. the Defendant had no reasonable legal alternative to violating the law, meaning that he had no reasonable opportunity both to refuse to do the criminal act and to avoid the threatened harm.

The defendant has the burden to prove by a preponderance of the evidence that his conduct was legally justified by this defense. In order to meet this burden of proof, the defendant must prove all three of the above numbered conditions by a preponderance of the evidence.

Determination of Charges

After considering all the evidence, if you decide the State has not proved beyond a reasonable doubt all of the elements of one or both of the crimes charged, or if you decide the Defendant has proven all three elements of the defense of necessity by a preponderance of the evidence, you must return a verdict of not guilty on that crime.

After considering all the evidence, if you decide the State has proved all of the elements of one or both of the crimes charged, and you decide the Defendant has failed to prove one or more elements of the defense of necessity, then you shall return a verdict of guilty on that crime.

Direct and Circumstantial Evidence

Evidence may be direct or circumstantial. Direct evidence is direct proof of a fact, such as testimony by a witness about what that witness personally saw or heard or did. Circumstantial evidence is indirect evidence, that is, it is proof of one or more facts from which you can find another fact.

You are to consider both direct and circumstantial evidence. Either can be used to prove any fact. The law makes no distinction between the weight to be given to either direct or circumstantial evidence. It is for you to decide how much weight to give to any evidence.

Reasonable Doubt

Proof beyond a reasonable doubt is proof that leaves you firmly convinced the defendant is guilty. It is not required that the government prove guilt beyond all possible doubt.

A reasonable doubt is a doubt based upon reason and common sense and is not based purely on speculation. It may arise from a careful and impartial consideration of all the evidence, or from lack of evidence.

Preponderance of the Evidence

Proof by a preponderance of the evidence means you must be persuaded by the evidence that the defense is more probably true than not true.

**IN THE 51ST DISTRICT COURT
IN AND FOR LONE STAR COUNTY**

STATE OF LONE STAR

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CASE NO. 26-REG-CR

v.

CHRISTOPHER LUDDOCK
Defendant.

VERDICT FORM

1. How do you find the Defendant CHRISTOPHER LUDDOCK on the charge of Aggravated Assault?

___ GUILTY ___ NOT GUILTY

2. How do you find the Defendant CHRISTOPHER LUDDOCK on the charge of Leaving the Scene of an Incident Without Reporting with Personal Injury?

___ GUILTY ___ NOT GUILTY

Date: _____

Signed: _____

Jury Foreperson

After this form has been signed, deliver it to the Court Clerk.

AFFIDAVIT OF JORDAN COPELAND

STATE OF LONE STAR

COUNTY OF LONE STAR

I, Jordan Copeland, being duly sworn, state the following:

1. My name is Jordan Copeland. I am twenty-nine years old and have lived in Lone Star City, Lone Star for the past six years. I work as a graphic designer. Everything I describe below is based on what I personally saw and experienced. If asked to testify in court, I could and would testify to these facts.
2. On June 15, 2025, I went to a "No Kings" rally with my friend Victoria Perez. Victoria and I had been close friends since college—we graduated together from Lone Star State in 2018. She was thirty years old at the time of the rally. I was dressed in all black that day—black clothes, a black hat, a black mask, and a little black backpack with white trim. I thought we were both going to dress up all in black to get in the spirit of the protest. But then Victoria showed up wearing ripped jeans, a black jacket, and a leopard print tube top. There were about fifty people there.
3. Victoria and I aren't really political people. Honestly, we went because it sounded like a fun thing to do together, more of a social outing than anything else. Victoria had seen a flyer for the rally at a coffee shop earlier that week and texted me about it. We figured we'd check it out, maybe grab some sushi afterward. And it was fun—at least until everything went wrong.
4. The rally was held downtown, near Liberty Square. At around 6:00 pm the crowd started to thin out, but there were still many folks out, slowly making our way down Pittsburg Street. We were all standing around in the street at the intersection of 5th and Pittsburg chanting. That's when I noticed a small, dark red sedan slowly coming toward us from the east, heading westbound on 5th Street. People were chanting and someone had a megaphone, so there was a lot of noise. I could hear the driver shouting something out his window, but the noise around us was so loud that I couldn't make out what he was saying.
5. The car just kept moving forward. It never stopped. I never heard the driver honk the horn—not once. People around me started shouting for him to stop, but he didn't. The only thing I heard him say clearly was, "Get out of the street, you losers!"
6. Victoria stood right in front of the car. We all thought the car would come to a stop and back up. It kept rolling forward really slowly. The front bumper kind of hit Victoria's shins and she jumped onto the hood, screaming at him to stop. But instead of stopping, the driver accelerated. Victoria fell off the hood, and her leg went under one of the front tires and then under the back tire.
7. She started screaming. The scream was the worst thing I ever heard. The car just drove off.

8. I ran to her and held her while I shouted for someone to call 911. She was crying and saying she couldn't feel her leg. I could see it was bent at a bad angle below the knee. A few other people gathered around us, and someone gave me their jacket to put under her head. The ambulance came a few minutes later—I'd guess it was about five or six minutes—and the paramedics put her on a stretcher. They took her to the Regional Medical Center. I followed in my car and stayed with her until her mother arrived around midnight. She had a broken tibia and fibula in her left leg. She ended up needing surgery and was on crutches for almost 3 months.
9. Victoria was diagnosed with an aggressive form of pancreatic cancer in early 2025. She passed away on October 17, 2025. She was only thirty-one. I was with her in her final days, and we talked about that night at the rally more than once. She never fully recovered emotionally from what happened—she had nightmares about it, and she walked with a slight limp even after her leg healed. She would have wanted to tell her own story about what happened that night, but she can't now. I will never forgive that driver for making her last few months on this earth so painful. Part of why I'm giving this statement is to make sure her story is told—to describe what I saw happen to her.

Verification

I swear under penalty of perjury that everything I have said in this affidavit is true and correct to the best of my knowledge.

Jordan Copeland

Jordan Copeland

Sworn to and subscribed before me this 16th day of October, 2025.

Notary Public

My Commission Expires: January 1, 2027

**Select portion from transcript of sworn testimony of Jordan Copeland
at hearing on State's Motion to Strike Defenses**

Q: Alright. Let me move this video to about eight and a half seconds and freeze it there. What do we see?

A: That's Victoria there on the ground. She's the one screaming in pain after her legs were run over. That's me there, in the black, trying to comfort her.

...

Q: I want to go to what happened before the video we just watched. Had you seen the red car before it drove into Victoria?

A: Yeah. We were at 5th and Pittsburg, and I saw it as it was coming down 5th Street toward us.

Q: What happened as it was coming down 5th Street?

A: It wasn't going all that fast, maybe five, ten miles per hour, but it never actually stopped. The first time I realized something was wrong was when it drove through a guy with his bike.

Q: Tell me about that.

A: There was a guy there with his bicycle and the car just drove through it. Like I said, not really fast, but he still knocked the bike out of the guy's hands. They guy had to jump out of the way to avoid getting hit.

Q: Then what happened?

A: There were some cops a little ways from us down Pittsburg Avenue, so I started yelling at them to try to get their attention.

...

Q: Let's freeze this next video here, just under two seconds in. Tell us what we can see in this image. Where are you?

A: I'm over there, closest to the box that says NTC News. That's me in the black hoodie with the black backpack with white stripes.

Q: Okay. And where's Victoria?

A: She's on the hood of the red car.

Q: Did she jump on the hood?

Q: No. I mean, we all just saw it. She was just standing there, not moving, and he drove right into her.

Opposing counsel: Objection, your honor, lack of personal knowledge under Rule 602. In the video, the witness was clearly looking in a different direction and could not have witnessed what he just described.

Judge: Sustained. Counsel, I can make the decision for myself what happened on the video. I don't need the witness to tell me what I can see with my own eyes.

Attorney: Understood, your honor.

Q: Let me move ahead. Let's run the video to about the six second mark. All right, it looked like you were right next to the passenger window as the car went by?

A: I was.

Q: What if anything did you hear the people in the car say?

A: As they drove past me, which is right when they were literally running over Victoria's legs, they were both laughing, and the driver yelled "Move, punk, get out the way!"

Q: Did he sound angry when he yelled that?

A: No. He was laughing, and it was like he was yelling the punchline of a joke or something.

Q: Are you sure those are the exact words you heard the driver yell—move, punk, get out of the way?

A: I'm positive!

...

Q: Is the man you saw driving the Red Kia Forte that ran over Victoria Perez, is he in this courtroom?

A: Yes, he's sitting right there in the blue suit, wearing a red tie, with the little smirk on his face.

Attorney: May the record reflect identification of the defendant?

Judge: The record will reflect that the witness pointed at the defendant and described his clothing.

...

Q: At any point, was the passenger asking people to get out of the way?

A: Not that I heard.

Q: At any point, did you hear either of them mention the hospital?

A: No, I never heard them say anything about the hospital.

Q: Did the passenger appear to be sick or in distress to you?

A: No. Like I said before, when they drove by, they were both laughing. He didn't look sick at all.

...

Q: Before we wrap up, tell the court about your record. Do you have any felony convictions?

A: I have been arrested a few times. A couple of years ago, I was arrested twice for prostitution. This is really embarrassing. I was having trouble making ends meet, so I started an OnlyFans page under a different name, and I always wore a wig. I had friends who were doing the same thing, and they said you only really start making big money when you meet your fans in person. I put one of those ads in the back of the Lone Star Free Tribune. I started hosting clients in my apartment. I was making more money but had to lie constantly to everyone I knew because what I was doing was so humiliating. A few weeks after the ad went out, what turned out to be an undercover cop made an appointment and came to my apartment. After we discussed what would happen and the price, they arrested me. I only stayed in jail for two nights.

Q: I'm only looking for felonies.

A: I'm getting there. A month or two later, I got arrested again, for the same thing, in the same way, and had to spend 15 days in jail. When I got arrested a third time, it became a felony, and I had to complete 6 months of probation and an anti-sex-trafficking program. That was a total waste of time. I wasn't being trafficked, but whatever, I finished the program.

Q: Any other felony convictions?

A: I was also arrested in May of 2025. I was at an anti-ICE rally at the Lone Star State House and got arrested for obstructing a public highway for sitting down with a ton of other people in the street. Then they also hit me with a resisting arrest charge when the cops rammed my elbow into the pavement. They needed to explain how I got a huge bruise, so they charged me with resisting arrest. That case is over too. I've never gone to trial. So, I guess that's not a conviction. So, no, no other convictions.

AFFIDAVIT OF ROBIN WASHINGTON

STATE OF LONE STAR

COUNTY OF LONE STAR

I, Robin Washington, being duly sworn, depose and state as follows:

1. I was the passenger in the vehicle with Chris Luddock when he accidentally struck a protester at the No Kings Rally in downtown Lone Star City on Sunday, June 15, 2025.
2. Chris Luddock and I work together at Lone Star Petroleum Logistics Company. We are also friends outside of work and socialize on most weekends.
3. Chris Luddock is also a musician, and on June 15, 2025, he and I went to the Little Bear Pub where Chris had a gig.
4. We arrived at the Little Bear Pub around 2:00 p.m. Chris and I sat at one of the tables and ordered a couple of beers from the bartender, Kyle Dillman, who I know from prior visits to the Little Bear Pub. Chris and I talked about life for a while, then Chris started his set at around 3:00 p.m.
5. While Chris was performing his set, I began to feel unwell. I felt nausea and discomfort in my chest. At first, I thought it might just be indigestion, but I began feeling worse and worse.
6. Chris finished his set around 5:00 p.m. I told him that I was not feeling well and asked him to drive me home. He initially wanted to stay and get another beer, but I emphasized how bad I was feeling and that I really wanted to get home.
7. By the time we got to Chris' car, my chest was feeling very tight, and I felt light-headed as I walked.
8. We began driving westbound on Interstate 20, but during the drive, my chest tightness started turning into pain, and my heart started racing. I was also starting to have difficulty catching my breath. I was truly afraid that I was having a heart attack, so I told Chris that he needed to get me to a hospital.
9. When I told Chris I wanted to go to the hospital, we were about half a mile from exit 115 into downtown Lone Star City. I used the navigation app on my phone to look up the nearest hospital, which turned out to be the Lone Star Regional Medical Center.
10. I read the navigation directions from the app, and Chris drove where I said to go. The app took us down North Dixie Boulevard to Fifth Avenue downtown.
11. About a block from the hospital, we ran into a large group of protesters who were blocking parts of the street. Driving down Fifth, we didn't see any protesters until we

crossed Jefferson, and then it was too late. We couldn't turn around or back up. We had to get across Pittsburg. We were only a block away from the hospital.

12. Chris tried to drive slowly through the protestors, but a group of them got in our way.
13. I rolled down my window and told them we were trying to get to the hospital, but they started shouting obscenities at us and banging on the car.
14. At this point in time, I was in extreme distress. There was a crushing pain in my chest, my heart was racing, I could barely catch my breath, and I was sweating heavily. I had an overwhelming feeling of doom, and I was certain I was going to die.
15. I started begging with Chris to please, please get me to the hospital. Chris appeared to be very stressed by what I was saying, and he tried to slowly drive forward. A young man used his bicycle to block our path, and I told Chris to "just go, just go."
16. Chris kept driving slowly which pushed the bicycle out of the way, but as we got around it, a young woman with orange hair ran up and jumped on the hood of the car. Chris tried to wave her off and was honking his horn, but she wouldn't move.
17. Every moment that passed, I was feeling worse, and the sense that I was going to die was overwhelming, so I started begging Chris again to get me to the hospital. He looked at me and nodded.
18. Chris started driving forward again, this time a little faster, but still slow enough that the woman with the orange hair could get out of the way. Unfortunately, she wouldn't get out of the way, and she just kept backing up with her hands on the hood of the car.
19. As we were slowly pulling forward, the woman with the orange hair appeared to trip and fell to my side of the car. Even from the passenger seat, it looked to me like she rolled out of the way.
20. Chris had an even more restricted view of the passenger side of the car from the driver's seat, and I am certain he would not have seen that the woman's legs were in the path of the right wheels.
21. As Chris began to drive off, we felt a bump. Chris started looking back in the rear-view mirror, but I sincerely believed I was dying, and I yelled at him: "Go, go, go!"
22. I have a less clear recollection of the events at the ER, but I recall Chris helping me into the building, and I recall him yelling that we needed a doctor and that I was having a heart attack.
23. The ER staff took over and got me into a triage area where they hooked me up to heart monitors. My heart felt like it was pounding out of my chest and it felt like somebody put my whole chest in a vice. I was sweating profusely and was light-headed and couldn't catch my breath.
24. Despite the pain and distress that I was experiencing, it turned out that I was having a panic attack, not a heart attack.

25. To this day, I do not know what triggered the panic attack, but my doctor told me there is often not an identifiable trigger, and that panic attacks can happen out of the blue.
26. Even though what I experienced was ultimately determined to be a panic attack, what I went through was exactly what I would have thought a heart attack feels like. I still find it difficult to believe that it was merely a panic attack.
27. Chris Luddock had no way of knowing that I was merely having a panic attack. All he would have known was that I was repeatedly telling him that he had to get me to a hospital, telling him that I was dying, and begging him to hurry.

Verification

I swear under penalty of perjury that everything I have said in this affidavit is true and correct to the best of my knowledge.

Robin Washington

Robin Washington

Sworn to and subscribed before me this 14th day of November, 2025.

Notary Public

My Commission Expires: July 1, 2026

**Select portion from transcript of sworn testimony of Robin Washington
at hearing on State's Motion to Strike Defenses**

Q: Before we begin, let's get something out of the way. Do you have a felony conviction?

A: Yes. I have a 2018 conviction for trespass.

Q: What happened?

A: A friend and I were hunting pheasants. We were staying at an Airbnb, and we got turned around during the day. We thought we were back at the Airbnb, but it turned out we were on the neighbor's property, and we went in their house. They kind of looked the same. The DA offered me probation with no jail, but he wouldn't give me a misdemeanor because I already had a couple prior misdemeanor trespasses. I took the deal.

Q: I know you got offered probation, but did the charge carry a potential sentence of more than a year of imprisonment?

A: That's what a felony is. So yes.

...

Q: How well do you know Kyle Dillman?

A: The bartender? I only know Kyle from the Little Bear. My understanding, though, is that Chris and Kyle went to school together back in the day.

Q: Do Chris and Kyle get along?

A: Not really. I guess you could say they get along the way a bear gets along with a rattlesnake.

Q: What was the source of friction between the two of them?

A: Chris sings at the Little Bear fairly regularly, and he sings a lot of what you might call off-color songs.

Q: Why is that a problem?

A: Well, Kyle's a pretty dyed-in-the-wool liberal, and some of the things Chris sings about can offend the sensibilities of those folks. The other customers love Chris' songs, but Kyle always has a big, pissed-off expression when Chris is singing. Chris doesn't mean nothing by those songs, but some people take everything personally.

Q: I take it Mr. Luddock is more conservative?

A: You know, not really. I'm sure Kyle thinks so, but Chris isn't really all that political. He's more of what I'd call an equal opportunity curmudgeon. He'll complain about anybody. The

problem is Kyle is kind of black-and-white when it comes to politics. If you're not Woke, then you have to be MAGA in Kyle's eyes.

Q: Let's go forward to about a month after the incident. Did Chris ever record a song about protesters?

A: Okay, I know what song you're talking about, but it's not about protesters.

Q: What song do you believe I'm talking about?

A: "Move, Punk Get Out the Way." Yes, Chris started singing that song about a month after the incident. But it's not about protesters. It's actually a cover of a song that has a little more vulgar language in it. Chris cleaned it up a lot. He always says cursing is an ignorant person's way of trying to express themselves forcefully.

Q: What does that have to do with whether it's about protestors?

A: My fault. I went down a rabbit hole there. What I was going to say is we both always that it was a song about bad drivers. You know, people who sit in the left-hand land of the highway going five miles under the speed limit. Get out the way, punk, you're blocking traffic. In fact, it was my idea for Chris to sing it. I thought that song would sound cool in Chris's style. He agreed, started working on it, and it turned out great. We recorded it at my home and put it on his "Sitting on Luddock of the Bay" CD.

Q: Are you sure it doesn't have anything to do with protesters?

A: 100%! I ride into work with Chris most days, and we talk a lot about the drivers in Lone Star. It's a song about crappy drivers. Chris calls them Lefty-Lous. Well, to be precise, he calls them Frickin' Lefty-Lou's, only he doesn't use Frickin'.

Q: Doesn't it have the word "protesters" in it?

A: That don't mean nothing.

...

Q: Are there television sets in the Little Bear Pub?

A: Of course. It's a bar. There's TVs all over the place.

Q: What was showing on the televisions when you and Mr. Luddock were there on June 15?

A: I truly don't remember. When we were drinking, we were talking about things like work and sports. We weren't watching TV. Then Chris started his set, and I definitely wasn't watching TV then. And a little while after that I started feeling sick, and I was too worried about that to pay attention to what was on TV.

Q: Were any of the TVs there tuned to news stories about the protests downtown that day?

A: Not that I saw. They're usually all set on sports channels, and they turn the volume off when anybody is going to be singing.

Q: Can you definitively say none of the TVs were showing anything about the protests?

A: I really don't know what they were showing that day, but if any of them were showing anything about the protest, I guess that's proof that Chris and I weren't watching them. The first time I even knew there was a protest was when a bunch of the protesters surrounded our car and made it so we couldn't get to the hospital.

...

Q: Had Mr. Luddock ever said anything prior to June 15 that you are aware of about running over protesters?

A: Not that I ever recall, no.

Q: Have you?

A: You know, we get a lot of protests in Lone Star. We've had people sit in front of our plant and block the trucks coming in and out because they're against big oil. I might have commented about how sitting in the street in front of a moving semi is good way to get yourself run over, but I never insinuated that I would do it myself. And Chris, he never even said that much.

Q: On June 15, 2025, while you were at the Little Bear Pub, did Mr. Luddock ever say anything about the protesters who were downtown that day?

A: No. I already told you, we didn't even know that there were protesters until we turned down 5th Street.

Q: Did Mr. Lubbock ever suggest that the two of you should go down there and show the protesters what you thought of them?

A: I'm sorry? Did he suggest what?

Q: That you go down there and show the protesters what you thought of them?

A: Absolutely not. Where did you get that? No, he never said anything like that.

...

Q: Why didn't you go to Medical Center Hospital? It's bigger, it was just a few blocks further west, and you could have gone down Grant Avenue to get there instead of Dixie Boulevard.

A: If I'd been thinking clearly, that was probably the better choice, but the Regional Medical Center came up first on my app. All I could think about was that I wanted to get to the nearest hospital.

Q: Was Medical Center Hospital an option on your app?

A: I'm sure it was, but I wasn't trying to evaluate the different options. I just picked the one at the top of the list because I figured it was the closest.

...

Q: After you stopped the first time, what happened?

A: We weren't quite to the intersection at that point. There were people walking around with flags and signs, chanting and yelling about something. I rolled down my window and started yelling "get out of the way, get out of the way, we're trying to get to the hospital." But then a guy just walked up and put his bicycle in front of Chris' car.

Q: What did you do?

A: I told Chris: "Dude, I'm going to die, I can't wait for this." So, he honked, but the guy wouldn't move. I said: "I'm serious, I'm not going to make it." So, Chris started driving forward, and the guy stepped out of the way, but he kept holding his bike in the way, and Chris just kind of pushed out of the way with his car.

Q: Then what happened?

A: That girl with the orange hair ran up and jumped on the hood and a bunch of other people started swarming around the car.

Q: What if anything, did you say to them?

A: I kept saying that we were trying to get to the hospital, and please, please, please, let us through.

Q: How did they respond?

A: They screamed obscenities and called us names.

Q: So, what did you do?

A: I told Chris that I wasn't going to make it and to "just go, just go." He looked at me, and he nodded. It was like he knew he didn't have a choice, and he just started trying to push through everybody. I know he didn't want to hurt anybody, but he didn't have a choice.

AFFIDAVIT OF DR. KIRAN KHAN

STATE OF LONE STAR

COUNTY OF LONE STAR

I, Dr. Kiran Khan, being duly sworn, depose and state as follows:

1. I am a licensed physician in the State of Lone Star and am currently employed as an attending physician in the Emergency Department of Lone City Medical Center, also known as the Regional Medical Center, a safety net hospital seeing over 85,000 patients per year. I have personal knowledge of the facts set forth in this affidavit.
2. I attended Lone Star Medical College in Spring Lake, Lone Star after attaining my Bachelors of Science with honors from the North Dakota Institute of Technology. I completed my Emergency Medicine Residency Program at St. Agrestis Hospital in Brooklyn, NY.
3. On June 15, 2025, I was on duty in the Emergency Department of the Lone Star Medical Center when a patient, Robin Washington, arrived at the emergency room shortly after 6:00 p.m., complaining of severe and intensifying chest pains. Washington was a 52-year-old individual who was visibly overweight and reported a medical history that included high blood pressure and diabetes. Patient Washington also reported a significant family history of cardiac events, stating that both their father and grandfather had died of heart attacks. Upon initial examination, Washington was sweating, trembling, and exhibiting rapid, shallow breathing. Washington expressed extreme fear that they were experiencing a heart attack. Considering all of Washington's symptoms, family history, and risk factors (age, obesity, hypertension, and diabetes), the patient were considered extremely high risk for a myocardial infarction (heart attack).
4. In the emergency department, physicians are trained to assume that patients are being truthful when reporting their symptoms, including pain. This is a fundamental principle of emergency medicine, as failing to take a patient's reported symptoms seriously can result in delayed treatment and potentially fatal outcomes. Short of a neuroradiologist analyzing a high-resolution functional MRI of the patient's brain (which is not yet a standard clinical diagnostic tool), we have no objective tests to measure pain. Patients are physically capable of intentionally trembling and have control over the nature and speed of their breathing. The observed sweat was consistent with thermoregulation, not diaphoresis. Given the presenting symptoms and Washington's stated concerns, I followed standard emergency cardiac protocols and treated the condition as a potential myocardial infarction. I ordered a comprehensive panel of diagnostic tests, including but not limited to an electrocardiogram (EKG), cardiac enzyme blood tests (including troponin levels), chest X-ray, and continuous cardiac monitoring. I found no reason to refer the patient for further psychological or social work evaluations.
5. Troponin is a protein complex unique to heart muscle cells. When the muscles of the heart are damaged, as in a myocardial infarction or heart attack, the heart releases

troponin into the blood stream. Therefore, if troponin levels in the blood are elevated, it indicates cardiac distress. If the troponin level in the blood is normal, it is a sign that the muscles of the heart are functioning properly.

6. All diagnostic tests returned negative for myocardial infarction or any other acute cardiac event. Based on the negative cardiac workup, the clinical presentation, and the patient's reported symptoms, I determined that the event Washington experienced was not due to a heart attack, as our highly sensitive troponin test was negative and his EKG was normal. It is possible that the event was an acute anxiety/panic attack, but that is a diagnosis of exclusion and cannot be made in the Emergency Department. I prescribed the patient Ativan, which is an anti-anxiety medication, and Aspirin, and instructed them to see their primary care physician as soon as possible. I told Washington to immediately report to the ER if any of their symptoms return. To my knowledge, Washington has not returned to the Lone Star Medical Center Emergency Department.
7. Washington was accompanied by a friend, Chris Luddock, who was present when I discussed the test results with Washington. Luddock asked, "You're writing all this down, right? There's a record of all this that we can get a copy of, right?" I explained our digital record-keeping procedure and that a patient can request copies of all their records. I remember Luddock's question because it was extremely unusual. Mr. Luddock was sweating and appeared agitated. I asked if he would like to be examined by a nurse, and he said, "And you guys start running up the bill? No, thank you. I'm fine."
8. The symptoms of a severe anxiety attack and a heart attack are remarkably similar and can be virtually indistinguishable to the patient experiencing them. Both conditions commonly present with chest pain or tightness, shortness of breath, trembling, dizziness, and a racing heartbeat. Critically, both conditions also produce an overwhelming sense of impending doom—a profound and terrifying feeling that one is about to die. This sensation is not irrational or exaggerated; it is a genuine physiological response that accompanies both cardiac events and panic attacks.
9. For a layperson without medical training, it would be entirely reasonable to believe that the symptoms of an anxiety attack are the symptoms of a potentially fatal heart attack. Even trained medical professionals cannot distinguish between the two based on symptoms alone, which is precisely why I ordered a full cardiac workup for patient Washington before ruling out a heart attack. A patient experiencing these symptoms would have every reason to believe they were in a life-threatening medical emergency and that they were dying.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on this 14th day of November, 2025.

Kiran Khan, MD

Dr. Kiran Khan, M.D.

Subscribed and sworn to before me this 14th day of November, 2025.

Notary Public My Commission Expires: July 1, 2026

AFFIDAVIT OF KYLE M. DILLMAN

STATE OF LONE STAR

COUNTY OF LONE STAR

I, Kyle M. Dillman, being duly sworn, hereby state under oath as follows:

1. My name is Kyle M. Dillman. I am fifty-two (52) years old. I was born in Midland, Lone Star, and I have lived in Midland my entire life.
2. Midland is a small community where many residents know one another personally, and I am well known in the community. I am employed as the manager of the Little Bear Pub, commonly referred to by locals as the "LBP."
3. I graduated from Lone Star University on June 5, 1998, with a Bachelor of Arts degree in Hospitality.
4. The Little Bear Pub was previously owned by my best friend's father. After his death in 2014, ownership of the bar passed to my best friend, Bubba Boals.
5. The Little Bear Pub is a local neighborhood bar that has remained largely unchanged for many years. It has wood-paneled walls, worn floors, dim but warm lighting, five tables, twelve barstools, and 12 TVs. Many regular customers consider certain stools or tables to be "their" seats. Exhibit 15 is a fair and accurate diagram of the bar.
6. The Little Bear Pub hosts live music by local musicians on Fridays through Sundays, typically acoustic performances. There is no formal stage; performers set up in a small open area near the bar.
7. I know Chris Luddock and Robin Washington very well. They have been regular customers at the Little Bear Pub since reaching legal drinking age. Chris Luddock and I grew up together in Lone Star City and have known each other for most of our lives. He's currently dating my ex. I don't love that. When they got together, it lowered my opinion of both of them.
8. To my knowledge, neither Chris Luddock nor Robin Washington attended college. They frequently discuss hunting, fishing, trucks, and local community gossip. For many years, they regularly consumed Bud Light beer, but following a public controversy involving that brand, they switched to Coors beer, which Chris Luddock often refers to as "the American beer." Chris and Robin are known throughout Midland for stirring up trouble. People talked about how they would rather fight you than talk to you.
9. On January 4, 2021, I heard Chris tell Bubba that he would not be around for a while as he was going to Washington DC as he needed to "take care of business." I thought that was strange, as I could not imagine what business Chris would have in Washington DC. After January 6th, I understood what he meant by "taking care of business." I watched all that madness at the Capitol live on TV. I didn't specifically see Chris there, but he certainly would have fit in.
10. I remember an incident about a month before June 15, when Robin was in the bar, and the news showed a group of protesters in the streets of San Antonio. Robin said to the guy he was sitting next to the bar, "It is a good thing I wasn't in San Antonio, or I would have me a protestor hood ornament."
11. Approximately one year ago, Chris Luddock told Bubba Boals that he could sing, play guitar, and write his own songs. I advised Bubba Boals not to hire him as a performer

because I had heard him sing before, and I really thought he lacked talent. Despite my concerns, Bubba Boals agreed to allow Chris Luddock to perform at the Little Bear Pub on the second Sunday of each month because Bubba thought Chris might bring in customers, as he was very popular in Lone Star City.

12. Chris Luddock accepted the offer enthusiastically and has since performed regularly at the Little Bear Pub. His performance is from 3:00-5:00 PM. His performances typically attract a familiar group of local regulars who attend specifically to hear him play.
13. In my opinion, many of Chris Luddock's songs are crass and immature. If they weren't so stupid, I'd find them offensive.
14. On June 15, 2025, Chris Luddock was scheduled to perform at the Little Bear Pub. He arrived at approximately 2:00 p.m. Robin Washington arrived with him. They sat at the table they always use. (I have marked with a red "R" and "C" on Exhibit 16 where they were seated). They ordered 2 beers.
15. On that date, the major local news story was the "No Kings March." At least 6 of the 12 televisions in the bar were tuned to local news coverage of the march. I left the other 6 on the Houston Astros. Although the sound was muted, the footage of the marchers was visible from all seating areas in the bar. (I have marked with a red Ns on the TVs that were showing the march that day.)
16. When I delivered the beers, Chris Luddock stated, "Turn off this damn news. Those people need to get jobs." As I went back to the bar, I heard Chris say, "We should drive down there and show them who runs this country." I thought this was typical bluffing by Chris. I wish I had taken it seriously and called the police.
17. Chris Luddock began his performance at approximately 3:00 p.m. (I have marked with a red S where Chris performed). Shortly after he began playing, I delivered another beer to Robin Washington. Robin was watching the TV and appeared to be sweaty and his face was very red, like he was very angry, or about to throw up. I couldn't tell.
18. When Chris finished and went back to where Robin was sitting, Robin was talking to him and gesturing to the TV where the news of the protests was playing. I could not hear what they were saying, but I saw Chris keep shaking his head yes.
19. Chris Luddock and Robin Washington left the Little Bear Pub immediately following that conversation.
20. I have listened to a copy of the song titled "*Move Punk Get Out of the Way*," which was provided to me by the District Attorney. I recognize both the song and the singer. Chris Luddock is the individual singer on that recording, and he put that on his dumb CD "Sitting on Luddock of the Bay." That's an accurate picture of the CD case.
21. I am unsure when Chris Luddock first played that song, but he began performing it at the Little Bear Pub about a month after that June protest. For some reason, the patrons at the bar love it and usually sing along.
22. I find the song to be highly inappropriate because it references attacking protesters with a vehicle. Despite this, it is a crowd favorite, and many regular customers often sing along loudly when it is performed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Kyle M. Dillman

Kyle M. Dillman

Subscribed and sworn to before me on this 30th day of November, 2025.

Notary Public
My Commission Expires: January 1, 2027

SUNDAY
DOWNTOWN



NEW AT 11PM

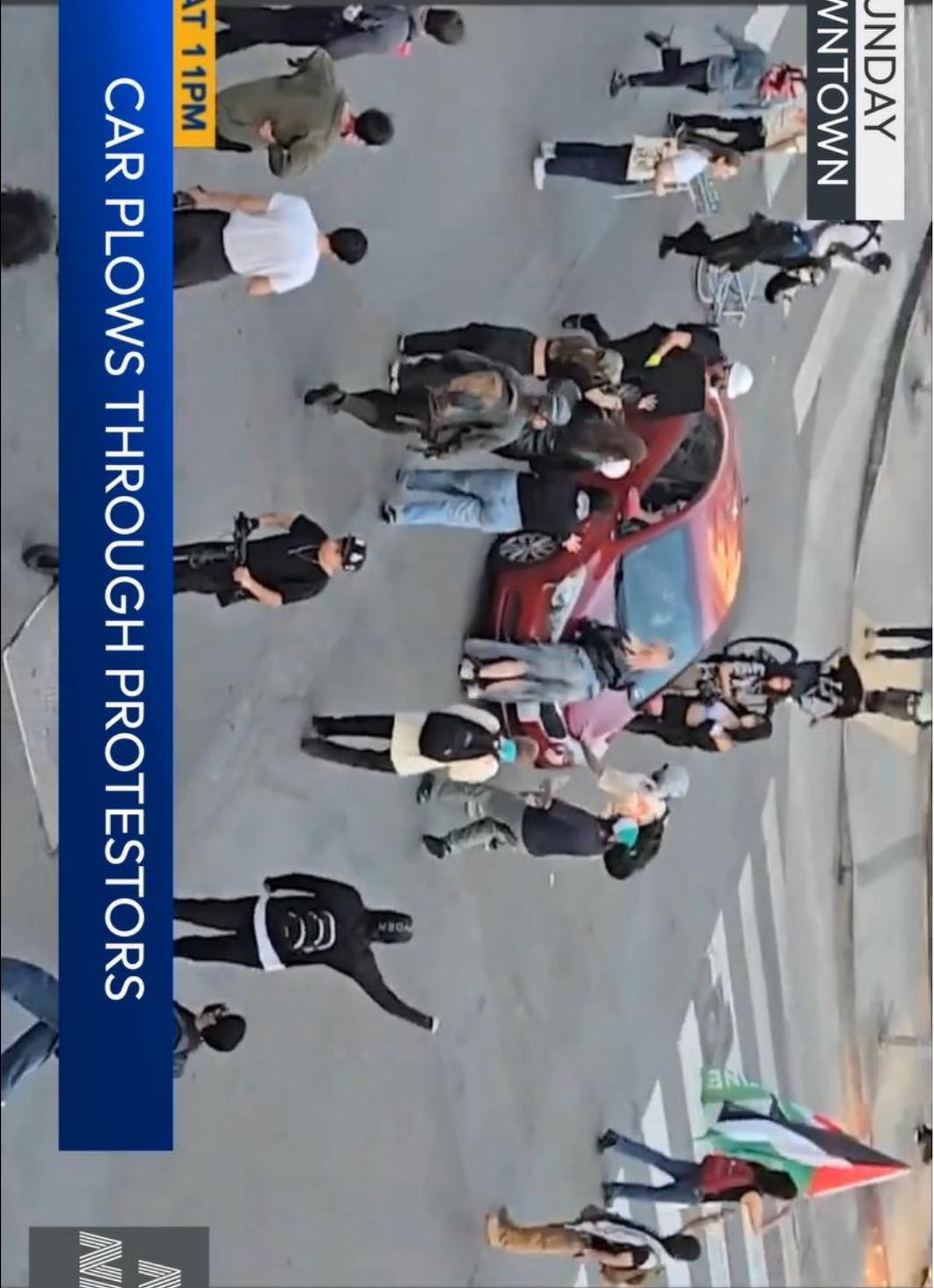
CAR PLOWS THROUGH PROTESTORS

NTC
NEWS

3

Exhibit

SUNDAY
DOWNTOWN



NEW AT 11PM

CAR PLOWS THROUGH PROTESTORS

NTC
NEWS

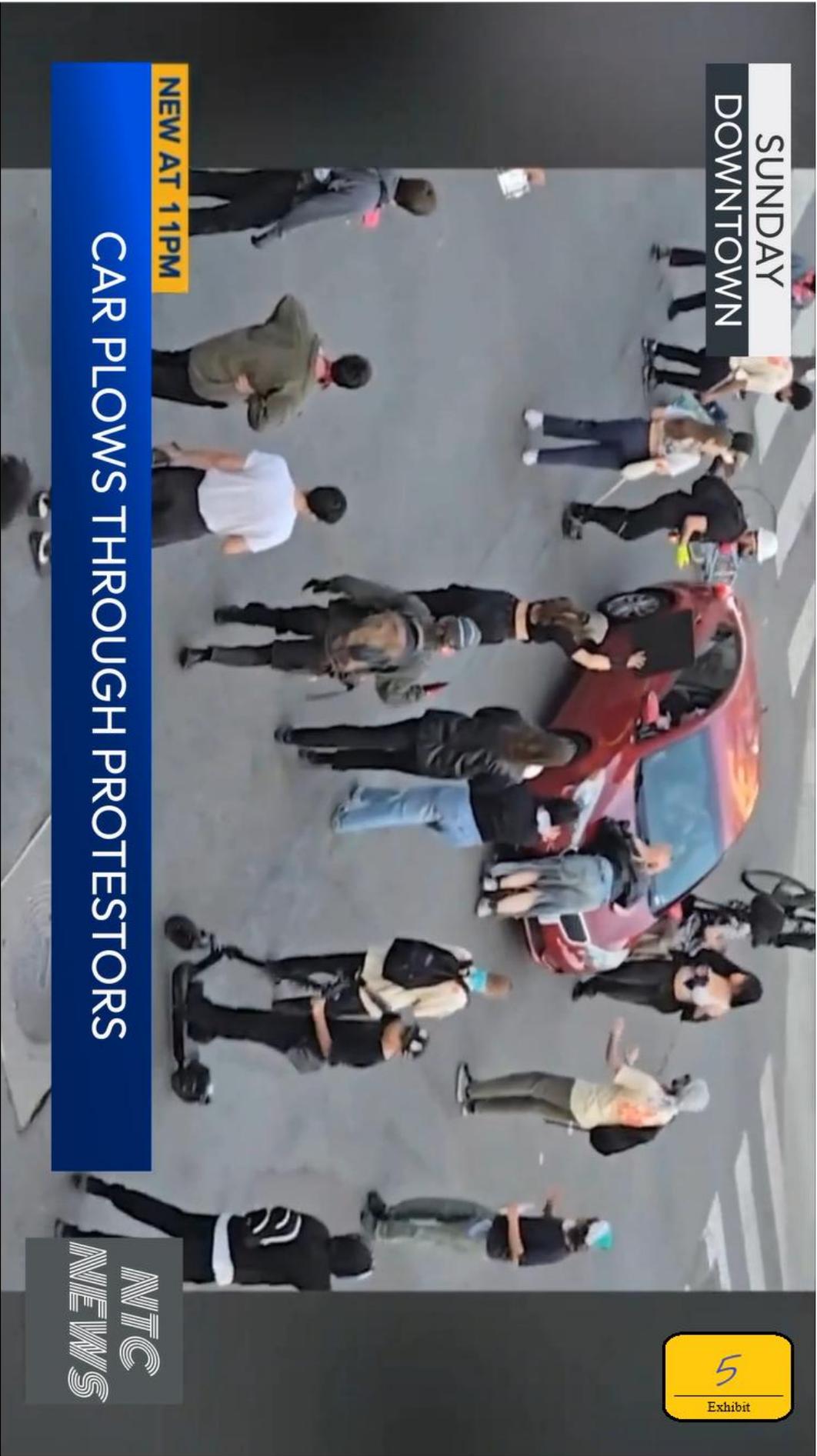
4

Exhibit

SUNDAY
DOWNTOWN

NEW AT 11PM

CAR PLOWS THROUGH PROTESTORS

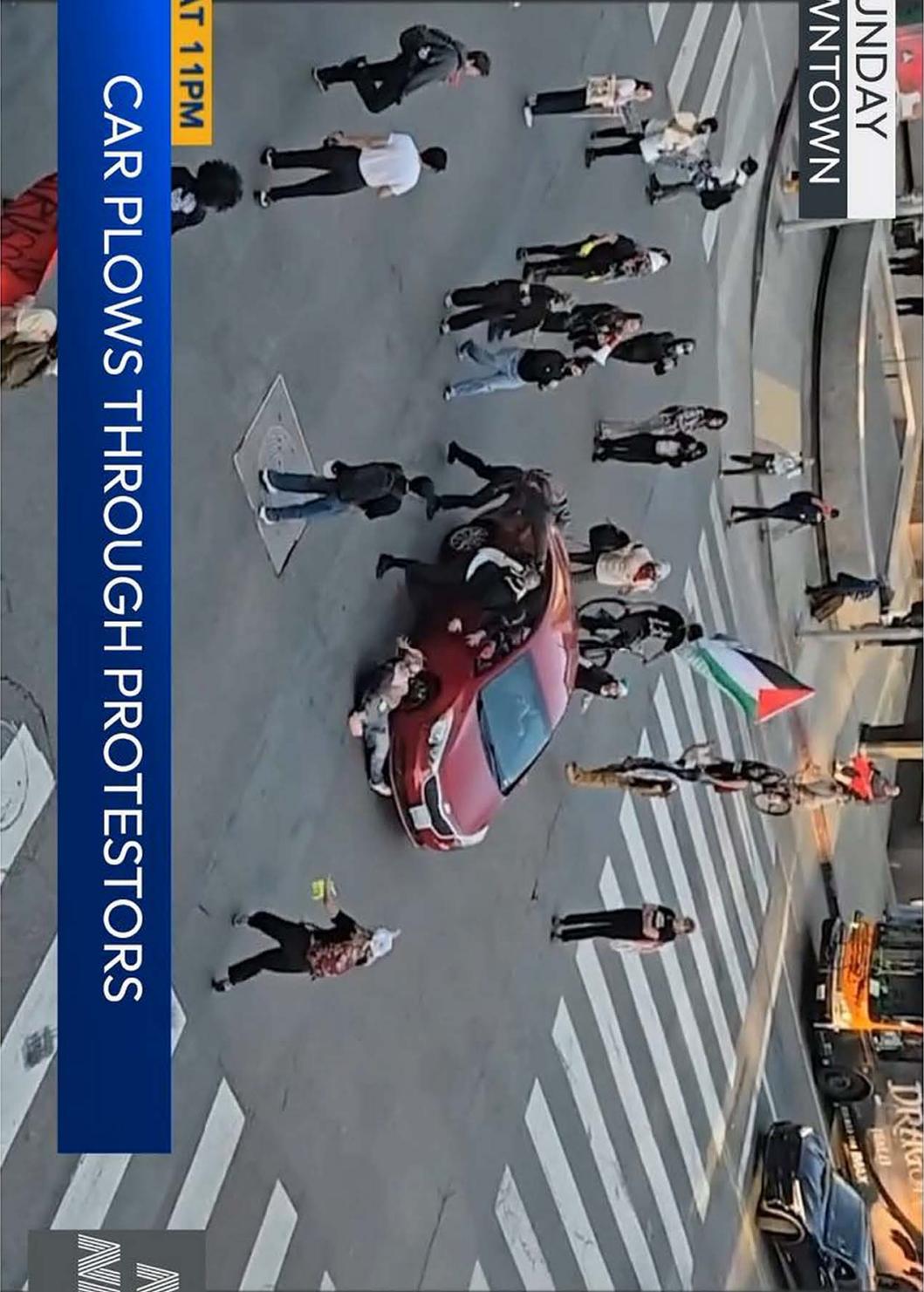


NTC
NEWS

5

Exhibit

SUNDAY
DOWNTOWN



NEW AT 11PM

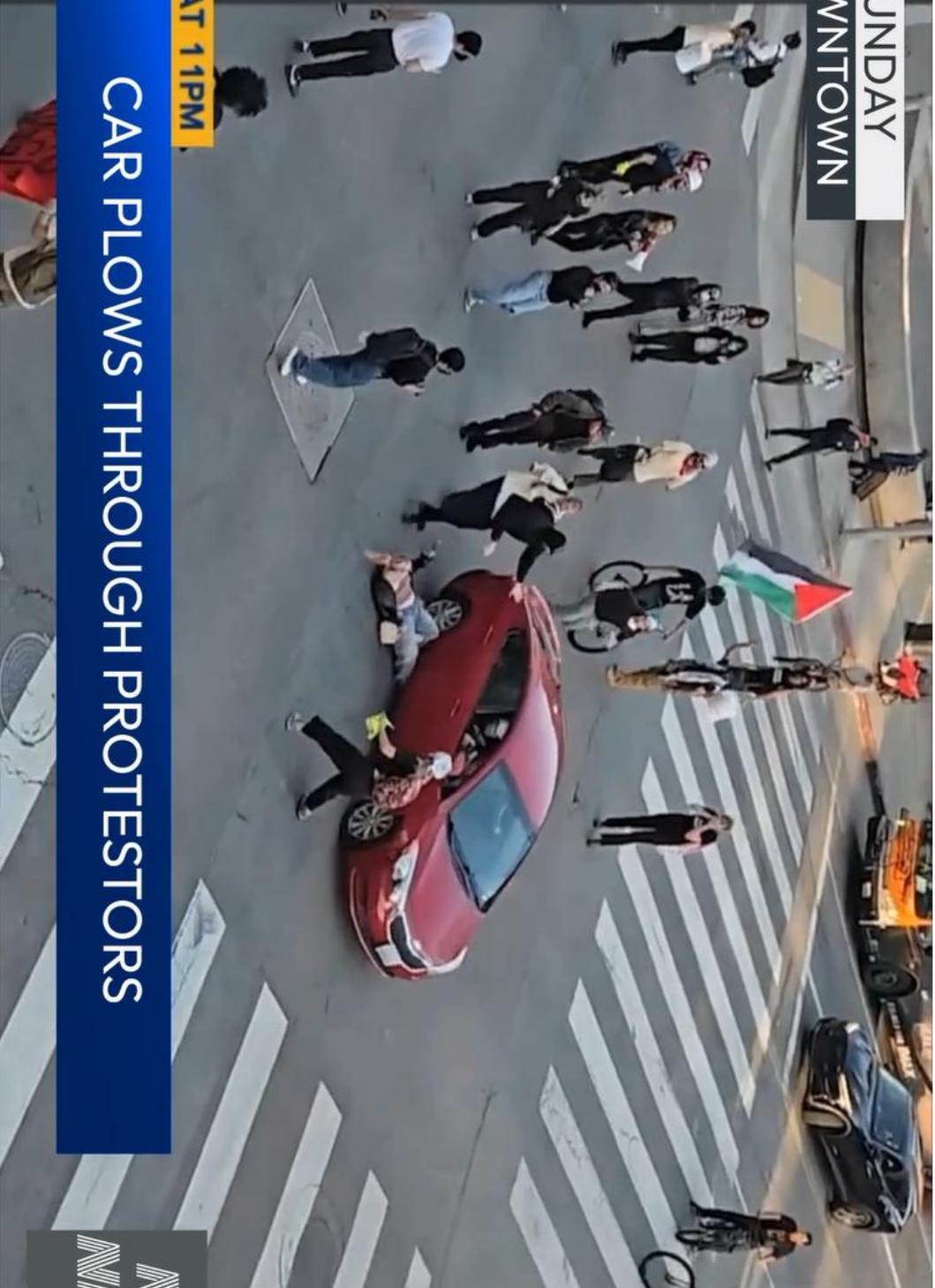
CAR PLOWS THROUGH PROTESTORS

NTC
NEWS

6

Exhibit

SUNDAY
DOWNTOWN



NEW AT 11PM

CAR PLOWS THROUGH PROTESTORS

NTC
NEWS

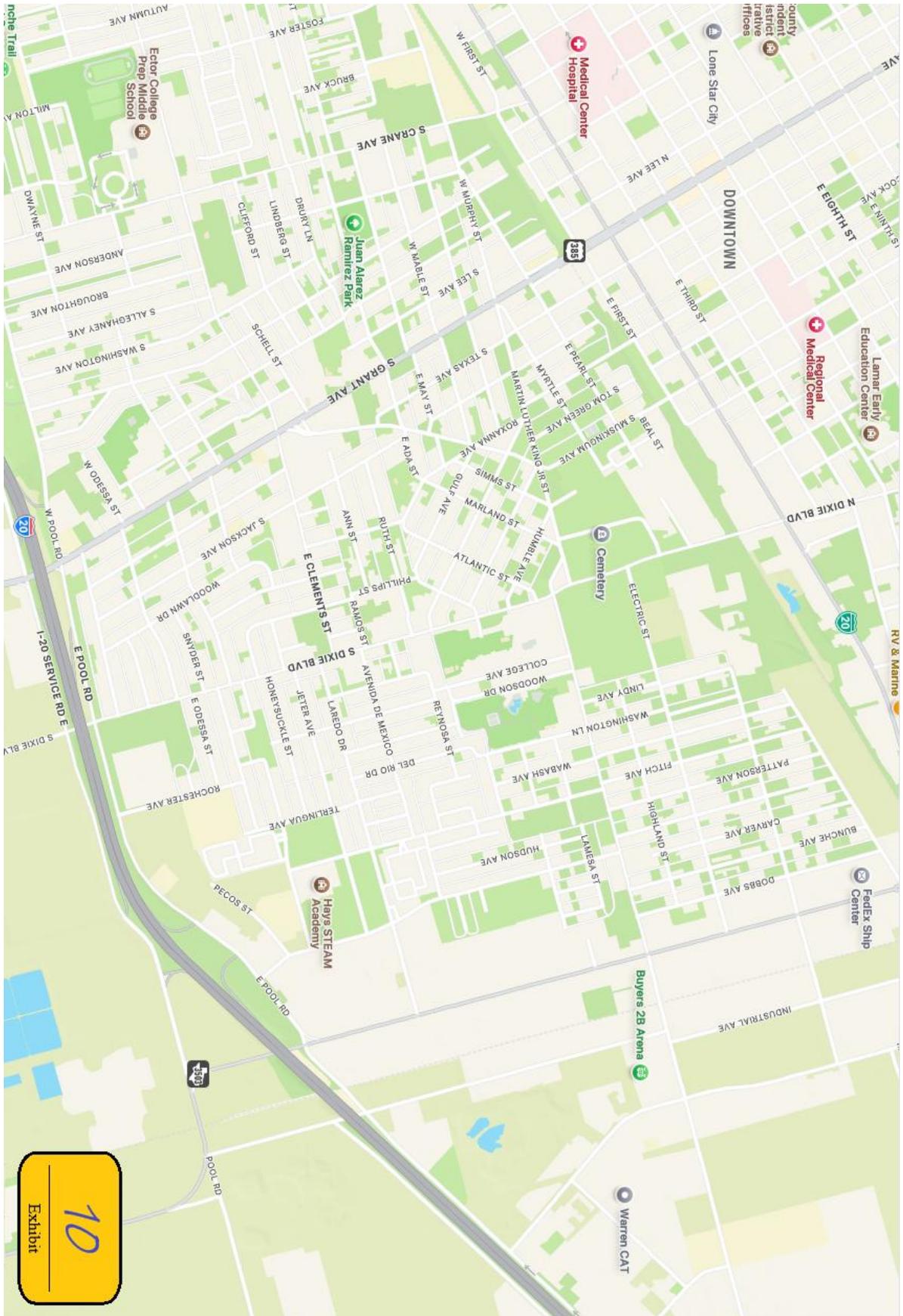
7

Exhibit

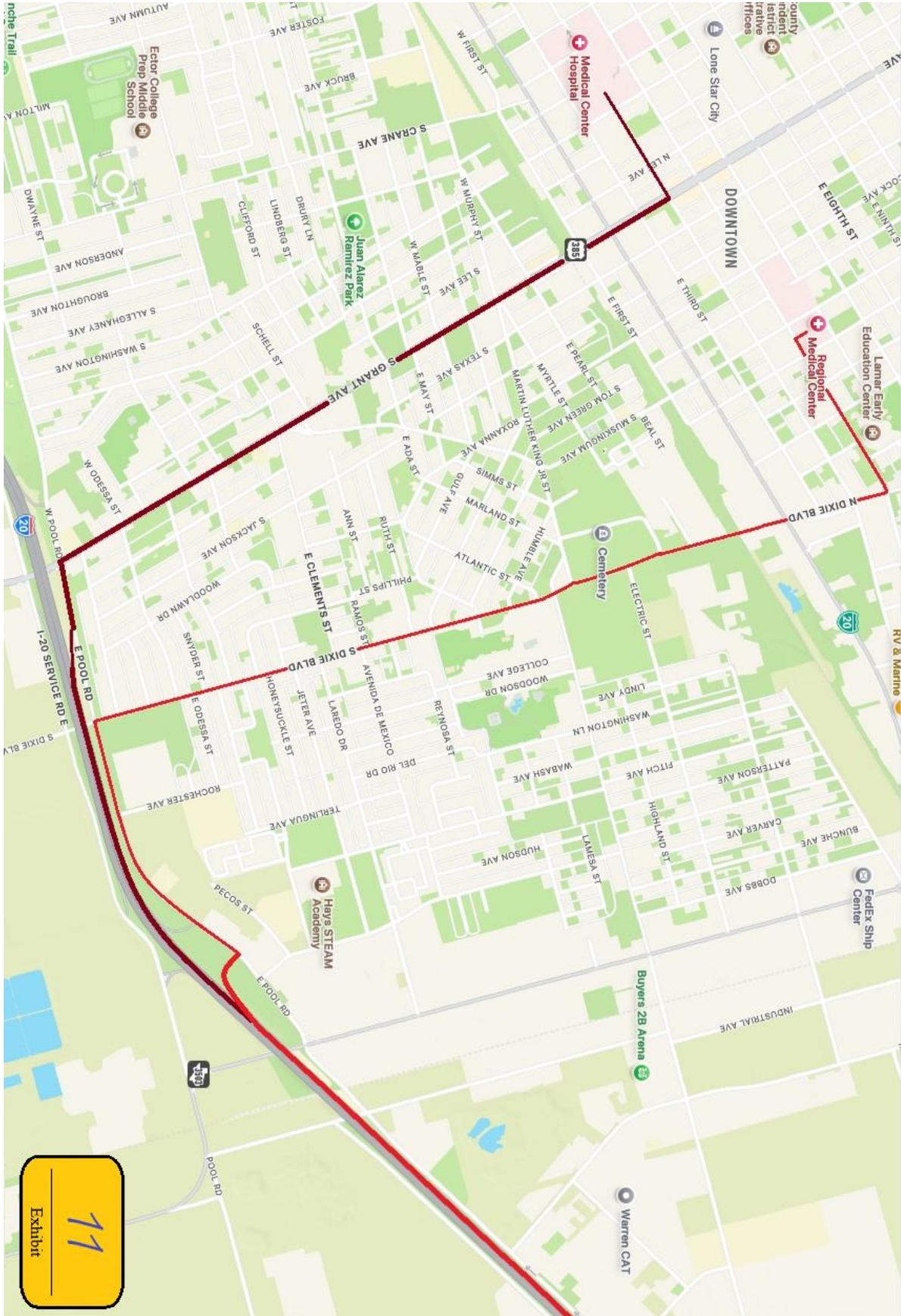




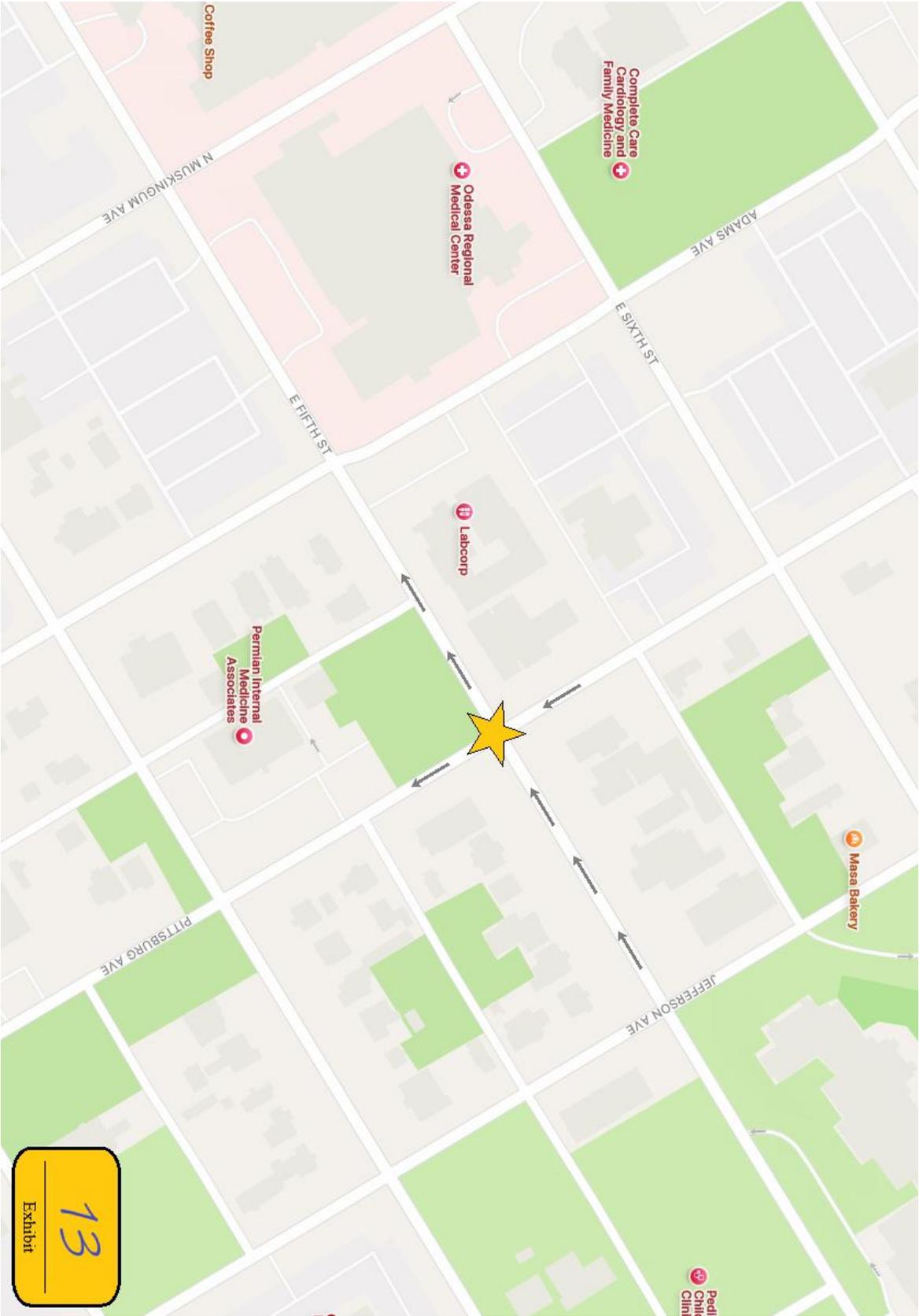
9
Exhibit



10
Exhibit



11
Exhibit





Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

Patient

Demographics

Name: Robin Washington
Address: 221-B, Baker St, Lone Star City, TX 75088
Date of Birth: 4/1/1973
Ethnicity: NOT HISPANIC OR LATINO OR SPANISH ORIGIN
SSN: xxx-xx-9999
Email: RWashington1973@gmail.com
Home phone: 945-705-3832

Relationships

Name	Relationship to Patient	Phone Number
Luddock, Chris	Emergency Contact	214-797-3734





Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY

Reason for Admission

Chief Complaint [last edited by Danielle Ruthberg, RN on 6/15/2025 1830]

- Chest pain and anxiety

Visit Diagnosis [last edited by Christina Napoli PA-C on 6/15/2025 1834]

Name	Code	Is ED
Chest Pain	R07.9	Yes

Visit Information

Arrival Date/Time: 6/15/2025 1824 Admit Date/Time: 6/15/2025 1830 IP Adm.
 Date/Time
 Admission Type: Emergency Point of Origin: Home
 Means of Arrival: Walked Primary Service: Emergency
 Transfer Source: Service Area: LONESTAR Unit: LSMC ADULT
 Admit Provider: Provider: Kiran Khan, MD

Discharge Information

Discharge Date/Time	Discharge Disposition	Discharge Destination	Unit
6/15/2025 2250	Home Or Self Care	None	LSMC ADULT

Follow-up Information

Follow-up With	Details	Why	Contact Info
PMD	Schedule an appointment as soon as possible for a visit in 1 week		



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Events

ED Arrival at 6/15/2025 1824

Unit: LSMC ADULT EMERGENCY
User: Doris Acevedo

Admission at 6/15/2025 1830

Unit: LSMC ADULT EMERGENCY Room: A12 Bed: A12-L
User: Danielle Ruthberg, RN
Patient Class: Emergency
Service: Emergency Medicine

ED Roomed at 6/15/2025 1839

Unit: LSMC ADULT EMERGENCY Room: A12 Bed: A12-L
User: Danielle Ruthberg, RN
Patient Class: Emergency
Service: Emergency Medicine

Discharge at 6/15/2025 2250

Unit: LSMC ADULT EMERGENCY Room: A12 Bed: A12-L
User: Jaclyn Lepkowski, RN
Patient Class: Emergency
Service: Emergency Medicine

ED Course

There is no data field.

ED Disposition

ED Disposition	Condition	Comment
Discharge	Stable	



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

ED MSE Note

ED MSE Note by Christina Napoli, PA-C at 6/15/2025 1838

Version 1 of 1

Author: Christina Napoli, PA-C

Service: Emergency Medicine

Filed: 6/15/2025 1838

Date of Service: 6/15/2025

Created: 6/15/2025

Status: Electronically Signed

Editor:

1837

Preferred Language:

Preferred Language English.

Information:

Time Seen by Me (Military Time): 18:38 Date: 6/15/2025.

HIV Screening:

HIV Screening: Not offered at this time

ED Provider Note:

ED Provider Medical Screening Note:

I have initiated a face to face evaluation of this patient.

chief complaint: history of hypertension. diabetes presents with complaint of chest pains and feeling anxious Denies shortness of breath, vomiting, fever

Exam: alert in no apparent distress; lungs clear

VITALS (last 24h) @ 7/11 18:36

Total count: 36.5

Heart Rate: 60 (60 - 60)

Blood Pressur: 149/83 (149/83 – 149/83)

Respiratory Rate: 18 (18 - 18) | SpO2: 97% (97% - 97%)

I ordered the following tests: ekg



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

ED Provider Note

ED Provider Notes by Kiran Khan, MD at 6/15/2025 2153

Version 1 of 1

Author: Kiran Khan, MD

Service: Emergency Medicine

Filed: 6/15/2025 2153

Date of Service: 6/15/2025

Created: 6/15/2025

Status: Electronically Signed

Editor:

2140

HPI

52 yo patient, past med hist diabetes, hypertension, presents with complaint of chest pain, onset today just prior to arrival. Reports pain is mid-sternal, tight in nature, non radiating, non reproducible. No associated nausea/vomiting, dyspnea, palpitations, or sensation of near syncope. No recent anginal symptoms or difficulty breathing. Pain was sudden onset, and accompanied by sensation of rapid breathing and reported fear “I could be having a heart attack”.

Past Medical History

Diagnosis	Date
-----------	------

Hypertension
Diabetes Mellitus, Type II

Past Surgical History

Procedure/Laterality	Date
----------------------	------

n/a

Family History:

Problem/Relation

Coronary Artery Disease / Myocardial Infarction



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Social History:

Tobacco Use

- Smoking Status: Never
- Smokeless tobacco: Never

Substance Use Topics

- Alcohol use: Yes
Comment: socially
- Drug use: Never

Review of Systems

General: see History Present Illness
Skin/Breast: negative
Ophthalmology: negative
Ears/Nose/Mouth/Throat: negative
Respiratory: negative
Cardiovascular: see History Present Illness
GI: negative
GU/GYN: negative
Musculoskeletal: negative **Neuro:** see HPI
Psych: see History Present Illness
Hematology/Lymphatics: negative
Physical Exam

Vitals:

6/15/2025 1836

Blood Pressure: 149/83
Pulse: 60
Resp: 18
Temp: 36.5
TempSrc: Oral
SpO2: 97%
Weight: 91 kg
Height: 1.70 m



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Physical Exam

Vitals and nursing note reviewed

Physical Exam

Vitals and nursing note reviewed.

Constitutional:

General: No in acute distress.

Appearance: Normal appearance. Non toxic-appearing.

HENT:

Head: Normocephalic and atraumatic.

Mouth/Throat:

Mouth: Mucous membranes are moist.

Eyes:

General: No scleral icterus.

Extraocular Movements: Extraocular movements intact.

Pupils: Pupils are equal, round, and reactive to light.

Cardiovascular:

Rate and Rhythm: Normal rate and regular rhythm.

Pulses: Normal pulses.

Heart sounds: Normal heart sounds. No murmur heard.

No gallop.

Pulmonary:

Effort: Pulmonary effort is normal. No respiratory distress.

Breath sounds: Normal breath sounds. No wheezing, rhonchi or rales.

Chest:

Chest wall: No tenderness.

Abdominal:

General: Abdomen is flat. Bowel sounds are normal. There is no distension.

Palpations: Abdomen is soft.

Tenderness: There is no abdominal tenderness. There is no right CVA tenderness, left CVA tenderness, guarding or rebound.

Musculoskeletal:

General: Normal range of motion.

Cervical back: Normal range of motion and neck supple. No rigidity or tenderness.

Skin:

General: Skin is warm.

Capillary Refill: Capillary refill takes less than 2 seconds.

Coloration: Skin is not jaundiced.

Findings: No erythema or rash.

Neurological:

Mental Status: Alert and oriented to person, place, and time.

Cranial Nerves: No cranial nerve deficit.

Psychiatric:

Mood and Affect: Overtly anxious appearing.



Washington, Robin
MRN: 5000068346, DOB: 4/1/73
Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Medical Decision Making

Assessment/Plan

Number of Diagnoses or Management Options

Chest pain, anxiety

Diagnosis management comments: Resident Note
Authored By: Kiran Khan, MD

Assessment: Briefly, Robin Washington is a 57yo patient w/ past med history hypertension and diabetes, presenting with chest pain and anxiety. Differential includes acute coronary syndrome, anxiety attack, musculoskeletal pain. Will obtain blood work including serial troponin, EKG, chest x-ray. Will reassess. Dispo pending work-up.

Kiran Khan, MD



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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

ED Progress Note

ED Progress Note by Kiran Khan, MD at 6/15/2025 2255

Version 1 of 1

Author: Kiran Khan, MD

Service: Emergency Medicine

Filed: 6/15/2025 2255

Date of Service: 6/15/2025

Created: 6/15/2025

Status: Electronically Signed

Editor:

2253

Labs unremarkable; troponin neg, EKG normal limits

Chest x-ray with no acute findings

Pt well appearing, vital signs stable. Asymptomatic. Shared decision making: explained that most likely explanation is musculoskeletal pain vs anxiety related and that acute coronary syndromw excluded by negative troponin and normal EKG. However, given age and physical condition, I instructed pt to have follow up this week with Primary Physician for full eval.

6/15/2025 2200

Blood Pressure: 144/91

Pulse: 68

Resp: 18

Temp:

TempSrc: I

SpO2: 98%

Weight: 91 kg

Height: 1.70 m

Kiran Khan, MD



Washington, Robin
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Adm: 6/15/2025, D/C: 6/15/2025

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

ED Nursing Note

ED Nursing Note by Jaclyn Lepkowski, RN at 6/15/2025 1920

Version 1 of 1

Author: Jaclyn Lepkowski, RN

Service: Emergency Medicine

Filed: 6/15/2025 1920

Date of Service: 6/15/2025

Created: 6/15/2025

Status: Electronically Signed

Editor:

1917

Preferred Language:

Preferred Language:

Preferred Language English/ English⁽¹⁾

Allergies:

Allergen/Product
No Known Allergies
No Known Allergies

Screenings:

Suicide Risk Screening:

Does the patient have an admission diagnosis or complaint related to a suicide attempt, emotional or behavioral disorder? (Note - risk factors may include any history of suicide attempt, currently seeing a therapist, provider, or psychiatrist for mental health, chronic pain, current or previous problem with alcohol and/or drug use) No⁽¹⁾

Alcohol/Tobacco:

Tobacco Use/Smoking History: Unknown if ever smoked.

Nutritional Screen:

Does the adult or pediatric patient have any non-healing wounds and/or pressure injuries? No.

Isolation Precautions:

Isolation: No



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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Focused Assessments:

Neurological:

Pupil Size - R (mm)	3 mm
Pupil Size - L (mm)	3 mm
Pupil Reaction - R	Brisk
Pupil Reaction - L	Brisk
Pupil Shape - R	Normal
Pupil Shape - L	Normal

Level of Consciousness	Alert and Oriented x3
Mentation	Normal
Speech	Clear
Strength - Arm R	5 - normal, lifts & resists fully
Strength - Arm L	5 - normal, lifts & resists fully
Strength - Leg R	5 - normal, lifts & resists fully
Strength - Leg L	5 - normal, lifts & resists fully
Light Touch - Arm R	Intact
Light Touch - Arm L	Intact
Light Touch - Leg R	Intact
Light Touch - Leg L	Intact

Respiratory:

Breath Sounds Left:	Clear
Breath Sounds Right:	Clear
Cough:	No



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Exam Complete - Signed-Off

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Labs

BASIC METABOLIC PANEL (Final Result), Troponin hs (Final Result), CBC W/DIFFERENTIAL (Final Result)

Electronically signed by: Kiran Khan, MD 6/15/2025 1905
 Ordering User: Kiran Khan, MD Ordering Provider: Kiran Khan, MD
 Authorized by: Kiran Khan, MD Ordering Mode: Standard
 Frequency: Emergency STAT 1 Occurrence Class: Unit Collect
 Quantity: 1
 Electronically signed by: Kiran Khan, MD
 Instance Release by: Kiran Khan, MD (auto-released) 6/15/2025 2049

Components

Component	Value	Reference	Flag	Lab
Sodium Level	139	132-146 mmol/L		LSMC
Potassium Level	4.6	3.5-5.1 mmol/L		LSMC
Chloride Level	107	99-109 mmol/L		LSMC
Carbon Dioxide	28.0	20.0-31.0 mmol/L		LSMC
Blood Urea Nitrogen	8	8-20 mg/dL		LSMC
Creatinine	0.71	0.44-1.03 mg/dL		LSMC
Glucose Level	214	74-106 mg/dL	*H	LSMC
Anion Gap	4.0	5.0-17.0	*L	LSMC
Calcium Level Total	9.3	8.7-10.4 mg/dL		LSMC
BUN/Creatinine Ratio	11	ratio		LSMC

Component	Value	Reference	Flag	Lab
Troponin hs	<3 ng/L	<3 ng/L		LSMC

Component	Value	Reference	Flag	Lab
WBC (10 ³ /uL)	5.3	4.2-9.1 10 ³ /uL		LSMC
RBC (10 ⁶ /uL)	5.29	4.63-6.08 10 ⁶ /uL		LSMC
Hgb gm/dL)	14.0	13.7-17.7 gm/dL		LSMC
Hct (%)	42.8	40.1-51.0 %		LSMC
MCV (fL)	80.9	79.0-92.2 fL		LSMC
MCH	26.5	25.7-32.2 pg		LSMC



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MCHC	32.7	32.3-36.5 gm/dL	LSMC
RDW	14.1	11.6-14.4 %	LSMC
Platelet	213	163-337 10 ³ /uL	LSMC



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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Neutrophil	45.3	34.0-67.9 %	LSMC
Lymphocyte	41.6	21.8-53.1 %	LSMC
Monocyte	7.8	5.3-12.2 %	LSMC
Eosinophil	4.5	0.8-7.0 %	LSMC
Basophil	0.6	0.2-1.2 %	LSMC
Immature Granulocyte	0.2	0.0-0.5 %	LSMC



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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Labs

Troponin hs (Final Result), 1h Delta Troponin hs (Final Result)

Electronically signed by: Kiran Khan, MD 6/15/2025 1905
Ordering User: Kiran Khan, MD Ordering Provider: Kiran Khan, MD
Authorized by: Kiran Khan, MD Ordering Mode: Standard
Frequency: Emergency STAT 1 Occurrence Class: Unit Collect
Quantity: 1
Electronically signed by: Kiran Khan, MD
Instance Release by: Kiran Khan, MD (auto-released) 6/15/2025 2204

Component	Value	Reference	Flag	Lab
1h Troponin hs <i>Delta (Δ)</i>	<3 ng/L <i>0 ng/L</i>	<3 ng/L		LSMC



Washington, Robin
 MRN: 5000068346, DOB: 4/1/73
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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

Medication Administration Record

Task Description WASHINGTON, ROBIN (DOB:04/01/1973) Emergency Dept Medications	Task Start	Task Stop	1700	1800	1900	2000	2100
Ativan 1 milliGRAM(s) Oral Once STAT (Medication Location: *Adult ED- BID9ISPD ORDERED BY: KHAN, KIRAN (06/15/2025 1905) TASK ACKNOWLEDGED BY: LEPKOWSKI, JACLYN (06/15/2025 2040) TASK COMPLETED BY: LEPKOWSKI, JACLYN (06/15/2025 2040)	6/15/25 20:40	6/15/25 20:40					
Aspirin 324 milliGRAM(s) Oral Once STAT (Medication Location: *Adult ED- BID9ISPD ORDERED BY: KHAN, KIRAN (06/15/2025 1905) TASK ACKNOWLEDGED BY: LEPKOWSKI, JACLYN (06/15/2025 2040) TASK COMPLETED BY: LEPKOWSKI, JACLYN (06/15/2025 2040)	6/15/25 20:40	6/15/25 20:40					

6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

[Attached Information](#)

Chest Pain (ENGLISH)

Chest Pain: Care Instructions

Your Care Instructions



There are many things that can cause chest pain. Some are not serious and will get better on their own in a few days. But some kinds of chest pain need more testing and treatment. Your doctor may have recommended a follow-up visit in the next 8 to 12 hours. If you are not getting better, you may need more tests or treatment.

Even though your doctor has released you, you still need to watch for any problems. The doctor carefully checked you, but sometimes problems can develop later. If you have new symptoms or if your symptoms do not get better, get medical care right away.

If you have worse or different chest pain or pressure that lasts more than 5 minutes or you passed out (lost consciousness), **call 911 or seek other emergency help right away.**

A medical visit is only one step in your treatment. Even if you feel better, you still need to do what your doctor recommends, such as going to all suggested follow-up appointments and taking medicines exactly as directed. This will help you recover and help prevent future problems.

How can you care for yourself at home?

- Rest until you feel better.
- Take your medicine exactly as prescribed. Call your doctor if you think you are having a problem with your medicine.
- Do not drive after taking a prescription pain medicine.

When should you call for help?



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6/15/2025 – ED in LSMC ADULT EMERGENCY (continued)

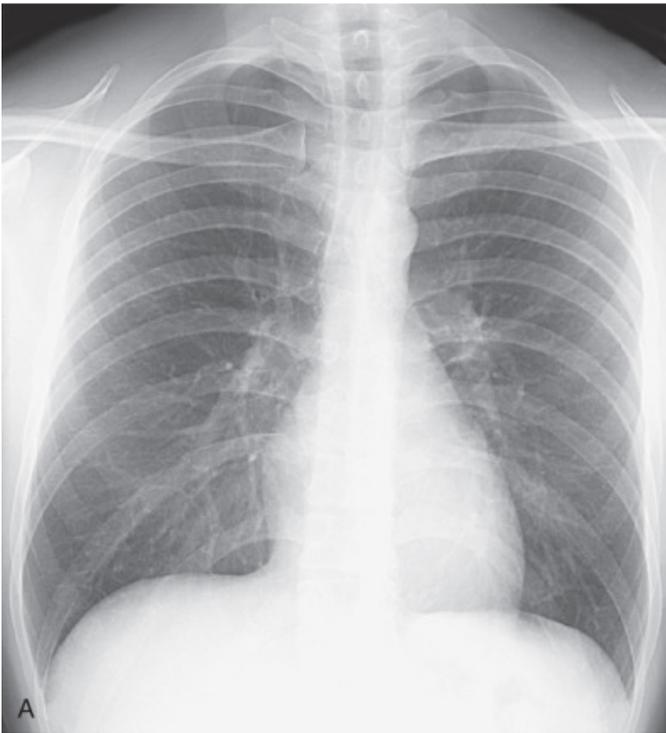


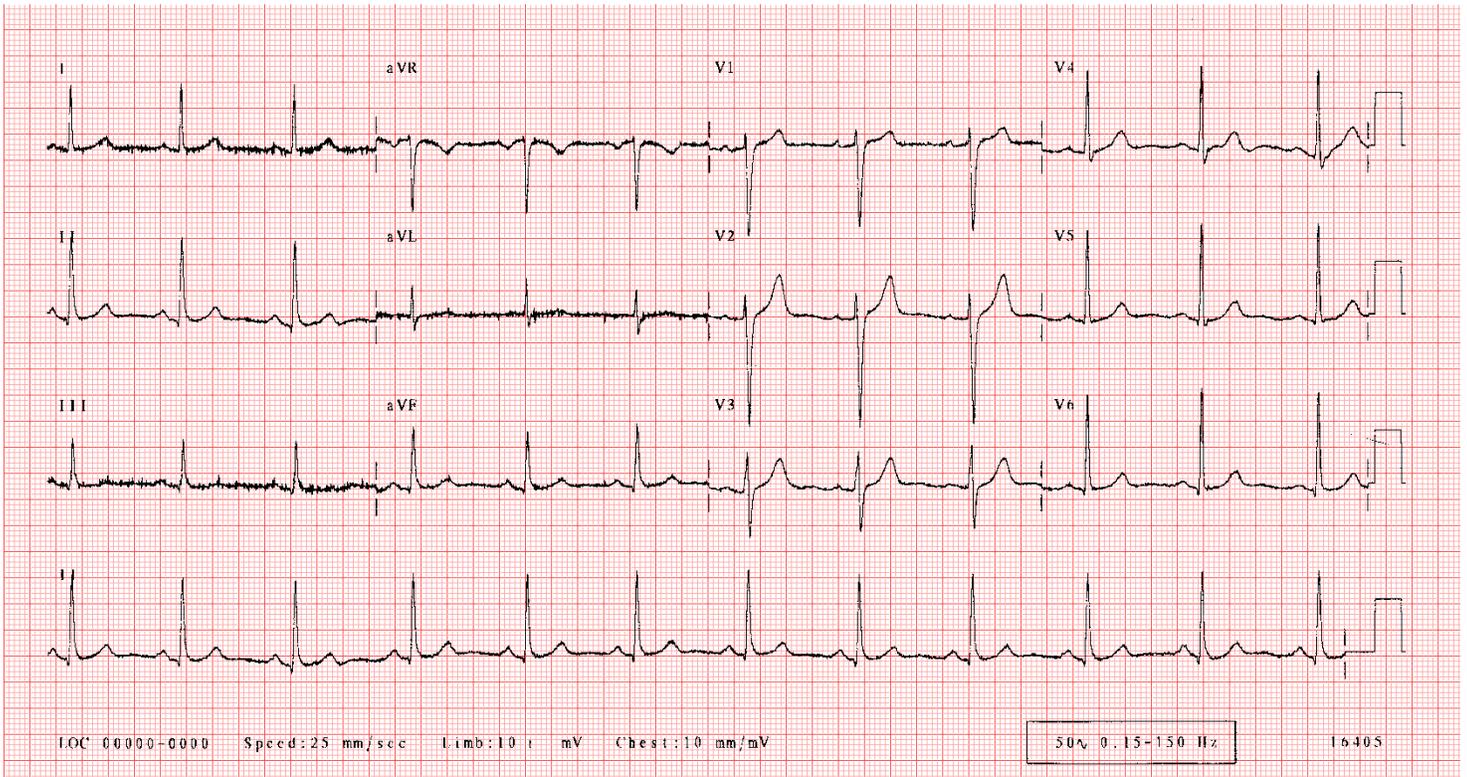
Call 911 if:

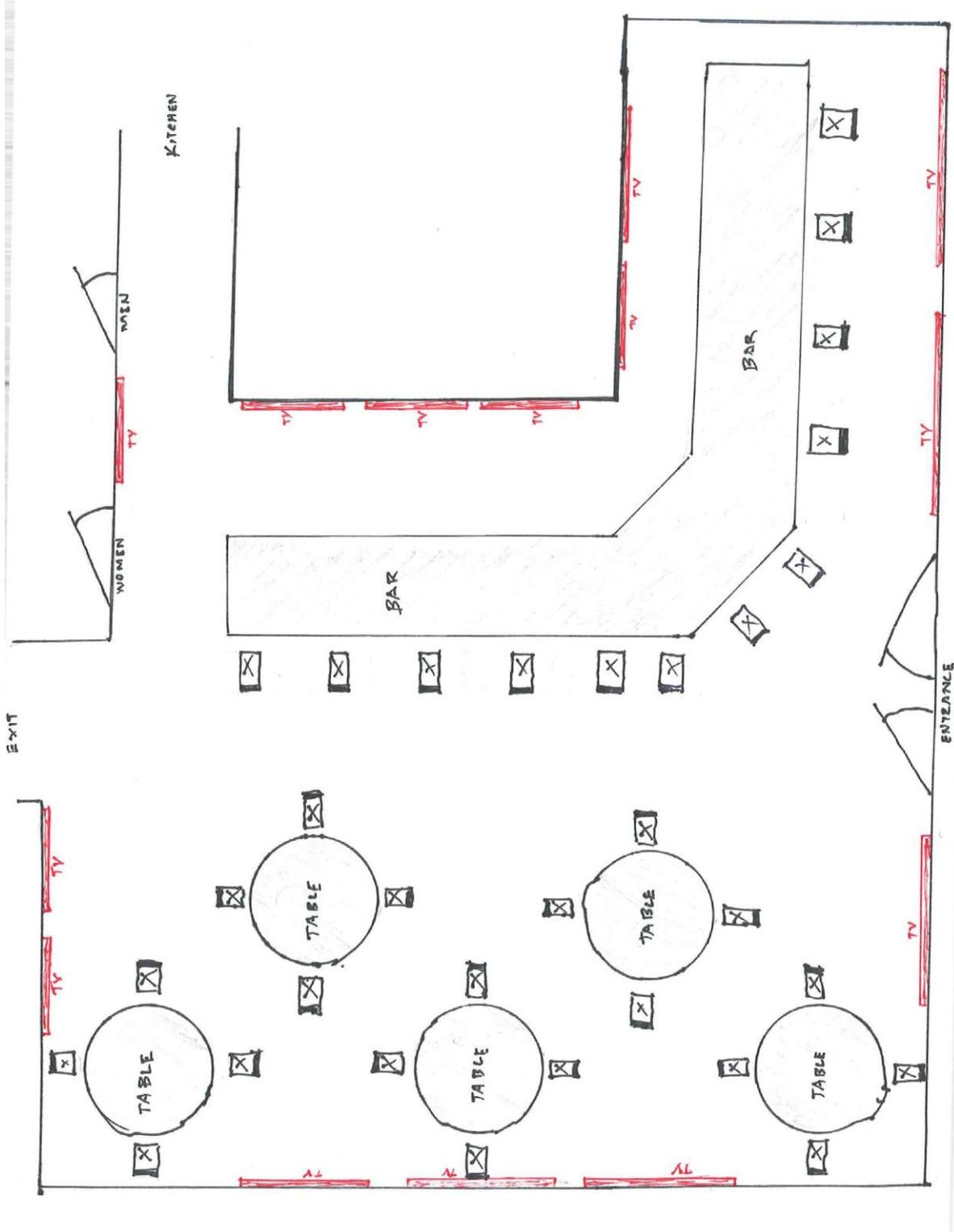
- You passed out (lost consciousness).
- You have severe difficulty breathing.
- You have symptoms of a heart attack. These may include:
 - Chest pain or pressure, or a strange feeling in your chest.
 - Sweating.
 - Shortness of breath.
 - Nausea or vomiting.
 - Pain, pressure, or a strange feeling in your back, neck, jaw, or upper belly or in one or both shoulders or arms.
 - Lightheadedness or sudden weakness.
 - A fast or irregular heartbeat.

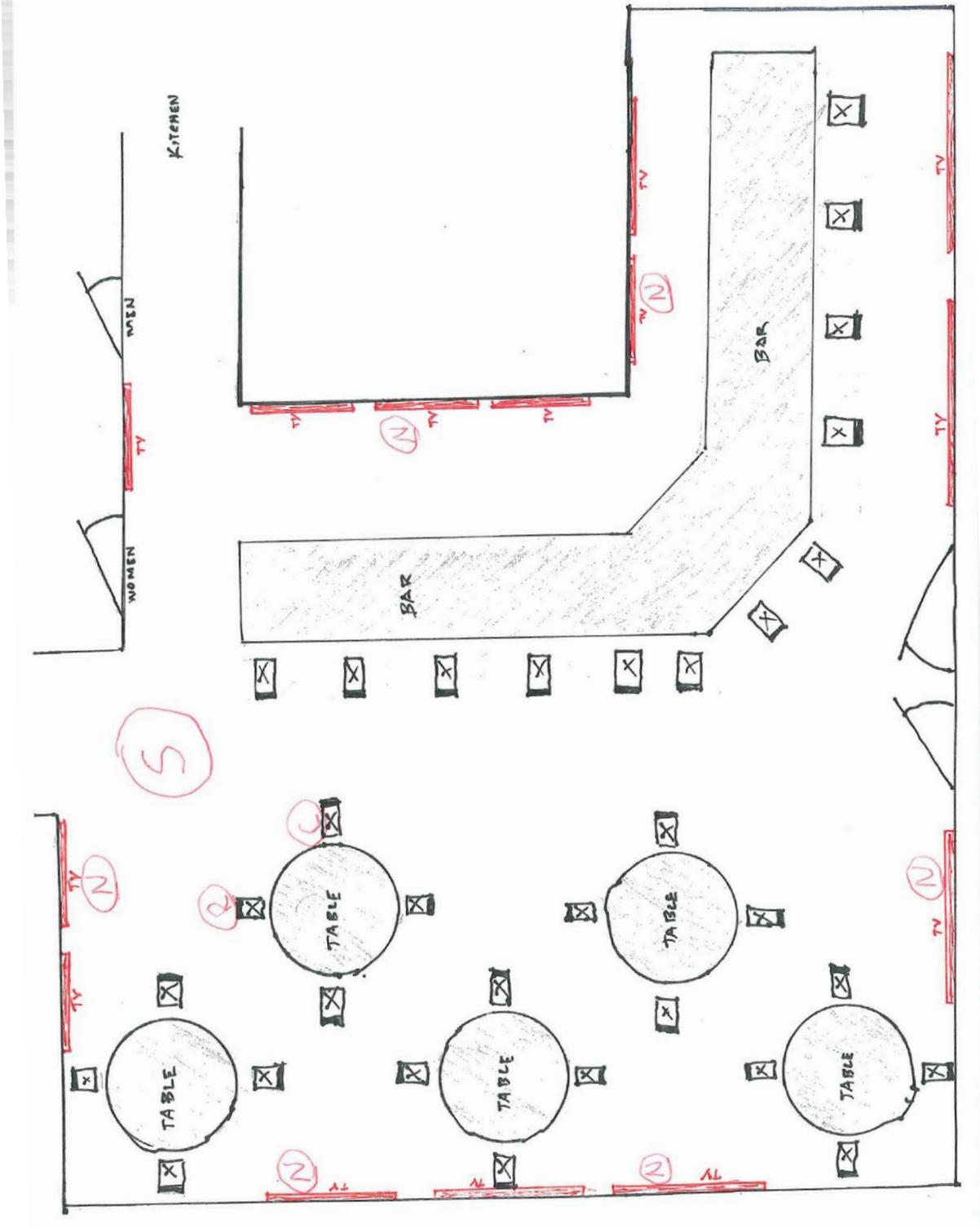
After you call 911, the operator may tell you to chew 1 adult-strength or 2 to 4 low-dose aspirin. Wait for an ambulance. Do not try to drive yourself.

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Get Out The Way

Chris Luddock

Move, punk, get out the way
Get out the way, punk, get out the way
Move, punk, get out the way
Get out the way, punk, get out the way

Move, punk, get out the way
Get out the way, punk, get out the way
Move, punk, get out the way
Get out the way, punk, get out the way

Oh no, the fight's out
I'm 'bout to punch your lights out
Get the heck back, guard your grill
There's somethin' wrong, we can't stay still

I've been drinkin' and bustin' two
And I been thankin' of bustin' you
Upside your motherflippin' forehead
And if your friends jump in, they'll get my tread

Causing confusion, disturbing the peace
It's not an illusion, we runnin' the streets
So, bye-bye to all you groupies and protesters
Is there a bumper on your butt? (No, mister)

I'm doin' a hundred on the highway
So if you do the speed limit, get the heck outta
my way I'm D.U.I., hardly ever caught sober
And you about to get ran the hell over

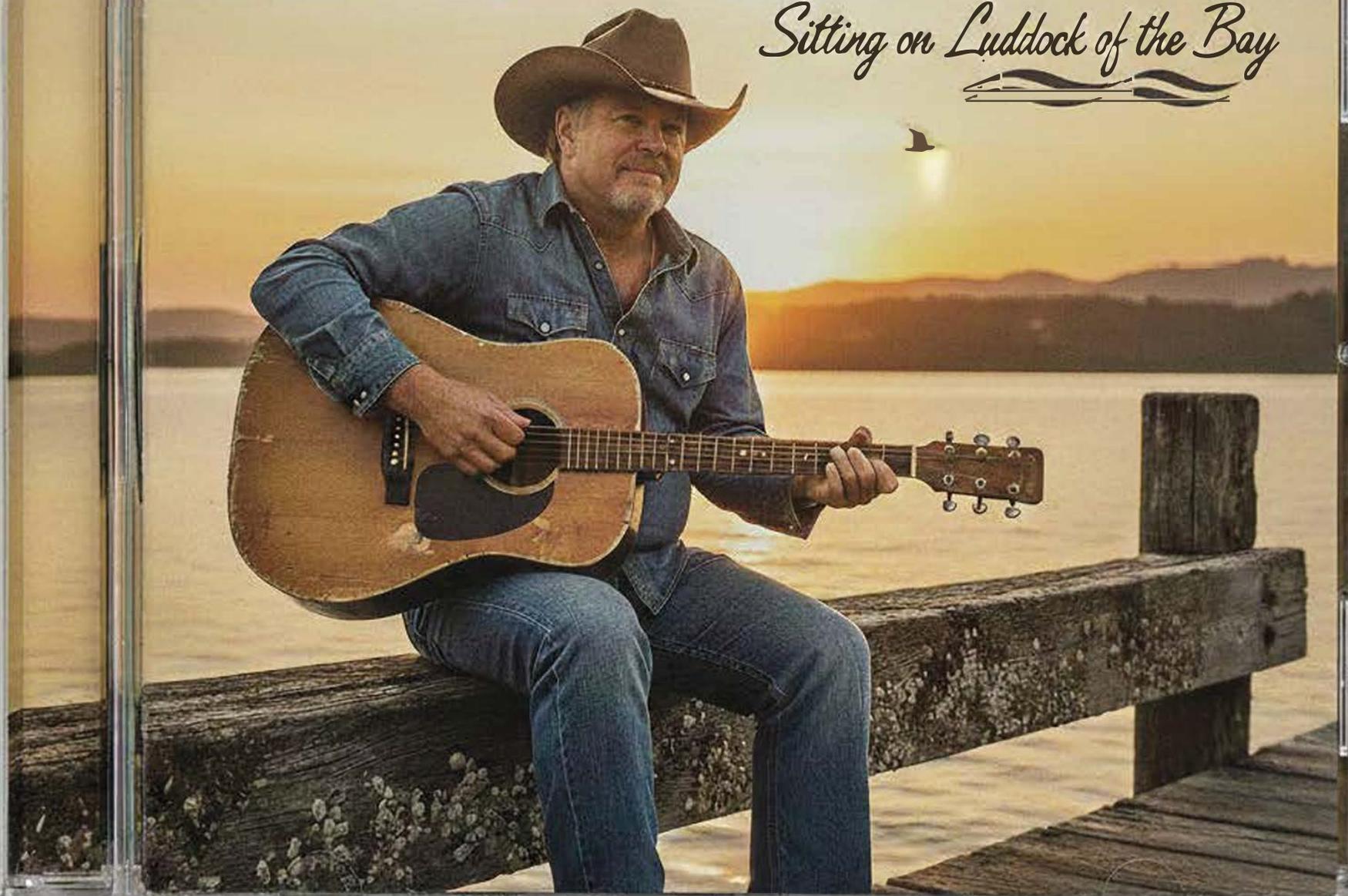
Move, punk, get out the way
Get out the way, punk, get out the way
Move, punk, get out the way
Get out the way, punk, get out the way (repeat)

17

Exhibit

CHRIS LUDDOCK

Sitting on Luddock of the Bay



18

Exhibit