

KAREN RENEE GOMEZ

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Exceptional Medical Litigation Paralegal. 30+ years of experience in all phases of pre-litigation/litigation for both plaintiff and defense, primarily for plaintiffs' personal injury and medical malpractice cases. (Agencies informed me for 25+ years that they had a Waiting List of firms interested in hiring me when I became available. For 25+ years, my attorneys called me their "**SECRET WEAPON**")

A FEW CAREER "HIGHLIGHTS"

(1) **Turned likely \$250,000 settlement for soft tissue injuries and emotional damages (including watching her best friend -who was driving- die) into a \$multi-million settlement (7-8 figure) for a TBI no one was even aware of!** Two years into the case against Nevada Power, and two days after I started working for the firm...I found **TWO WORDS** on the MRI report *Narrative* that were **NOT** in the Summary at the end of the Report ("*shearing injury*"). Those two words confirmed that the client had a serious **traumatic brain injury** as a result of the accident. Everyone had missed that! Her treating physicians, the radiologists and experts had all missed those 2 life-changing words. The new physicians and two new experts corroborated that the TBI had caused/was causing everything she had complained about for 2+ years, and the devastating and debilitating effects the TBI had on her activities of daily living and resulting loss of enjoyment of life 24/7! I created one of my famous 40-page demands. I illustrated her head/brain and body on at least 6 pages of illustrations with pain, all diagnoses (dates and dr), TBI complaints, and how everything affected/impacted her daily activities, including her ability to enjoy life. She was in so much pain 24/7, she could not enjoy her life. She and her husband decided it would be best to get a divorce, so she moved back home to live with her parents (who had to care for her). I included at least 20 pages of "before and after" photographs to show what activities she was able to do, things they did with their friends and with each other, how happy she had been before the accident, and how empty and tragically sad she was after the accident. **The case had been set for trial, but it settled for millions (7-8 figures) before the 30-day demand expired.** (2013 – Bruce Woodberry & Martin Little – Jolley Uрга Woodberry & Little; TBI Expert: Mark J. Mills, JD, MD – Forensic Psychiatrist)

(2) **Turned likely \$250,000 settlement for compound fracture in non-dominant arm with permanent scar into \$1 million policy limits settlement (+ TBI).** The first time I met the client was after the attorneys asked me to draft the demand. He was very macho and very proud. He obviously had a TBI, but was not aware that was causing the few problems he told me about. (Commercial van turned in front of his motorcycle – **his helmet came off!** Not one doctor noted that or TBI in their records!) He actually puffed out his chest and told me he just ignored his symptoms, and just did what he had to do at home and at work! He had been told what the approximate value of his case was at that time for ONLY his fractured arm and permanent scar. So, I started talking to him about some of my accidents and weird stuff that happened to me, and I told him how lucky he was that he didn't have to go through that nightmare like I did. He recognized a lot of his own symptoms with just a few things I said, and it opened the floodgates – literally. We talked for over an hour as I made copious notes, and then as he remembered other things, he called me so I could add those, as well. It resulted in one of my famous 40-page demands. I illustrated his head/brain, face and jaw on at least **10 pages** of illustrations with pain and TBI complaints **because there were so many injuries and symptoms**, and how each one affected/impacted his daily activities, including his ability to do his job, and enjoy life. His case settled for policy limits, **\$1 million.**

(Every single ADL and LOE effect = a “valuation.” If TBI-related, it’s over their lifetime. TBI is a **permanent injury, the damage to the brain DOES NOT HEAL!** And there are NO CODES for this information ~ you must get it directly from your client! I’ve NEVER seen much of it documented in their records, if any! Clients should keep a daily journal, and attorneys/paralegals should take detailed notes! This documented information will make a HUGE difference in so many ways.)

(3) **Likely Saved Client’s Life by Identifying her TBI and recommending TBI Rehab Therapy.** I worked on her case from Day 1 and she slowly deteriorated over just a few months from the TBI she denied! She worked in the IT department at the University of Florida in the top management position. She was divorced, but her teenaged daughters and dogs lived with her. According to her, she had always been in a good mood, happy, had a sense of humor and loved her life. After the accident, **NONE of her physicians recognized or documented her TBI**, and she ultimately became suicidal. Because she couldn’t remember how to do her job, they kept demoting her to positions with less responsibility, until there was nowhere else to go but out. Her daughters couldn’t take it anymore with her mood swings, confusion, irritability, temper tantrums, memory issues, sullenness, etc., so they took their dogs and moved in with their father. She ran into me at the grocery store one Sunday afternoon, and lost it crying in my arms – she told me she was ready to end it all! (Coincidence...?) As her **friend**, I suggested she make an appointment with a medical group that specialized in TBI rehabilitation therapy (and had a lot of success), and then call me (the paralegal) on Monday to tell me about that. Within a few months, she was feeling more back to normal, but she finished the program. In the meantime, she was able to go back to work in her original management position, her daughters and their dogs moved back in, and she met the man she ultimately married – at work! **(This was a policy limits settlement, as well. It also proved to me how valuable TBI rehabilitation therapy is, and how well it works!!)**

(4) **Turned Likely Defense Verdict into Policy Limits Settlement for TBI - \$600,000 - During the Last Minutes of Trial.** The likely defense verdict turned into a policy limits (**\$600,000 UIM**) settlement **on last day of trial** after a break, after Plaintiff’s expert testified. I talked to the (world-renowned) expert (the client’s mother demanded the attorneys retain) **during break** – I told him that he missed **2 words (basilar fracture)** on the initial radiology report because those words were in the **narrative**, NOT the Summary. (Everyone had ignored the binder I had put together months earlier for the Mediation, in which I addressed everything.) That fracture explained the client’s wide-range of devastating and debilitating psychological TBI symptoms, and turned the expert’s “probable” diagnosis, into an **absolute and definitive diagnosis**. (Wagner, Vaughn & McLaughlin, Tampa, FL – approx. 1993, Bill Wagner, Esq – Wagner Vaughn McLaughlin)

(5) **Found “Witness” to Corroborate Client was Wearing Seatbelt – BUT, There Were NO Witnesses! Plaintiff Settled for \$2 Million.** There were **NO WITNESSES** who could confirm she was wearing her seatbelt since she was found unconscious on the floor on the passenger side of her car. I found a section on seat belt injuries in one set of books in his library the day after I was asked to find a witness to testify that she had been wearing her seatbelt. Combined that **with her own medical records**, which documented the classic bruising from wearing the seatbelt, it settled for policy limits - **\$2 million**, after waiting for **2+ years** while the attorney tried to find a witness to testify at trial. (1992 – Dale Swope. When I showed him the research and medical records, instead of thanking me, he asked me – **“Who told you to do that?”** I told him that I don’t need someone to tell me how to do my job. I quit a few months later so his former paralegal could have her job back. Then a year later, he hired a private investigator to find me. He and another attorney (an MD) wanted me to help them open a new office to handle medical malpractice cases.)

(6) “Unique” Strategy” to Depose Defense Expert was Used During Trial – Plaintiff Awarded \$5.5 Million.

I was “Third Chair” during a medical malpractice federal bench trial in Hawaii. The Government’s expert actually testified, “I don’t know, Mr. Fried, *What did I say?*” Attorneys requested many spur-of-the-moment tasks during trial, including re-direct questions for Plaintiff’s expert after Defense expert testified. I also told them they needed to enter a one-page exhibit the Defendant had just entered because it supported Plaintiff’s position. The Hon. David Ezra waived the State caps on damages, and he looked at me the entire time he read his Decision. He awarded the largest med mal award in the State’s history at that time - **\$5.5 million**. He knew it was “my case.” (1990, Richard Fried, Esq. – Cronin Fried)

(7) New on job at insurance defense firm, and Shareholder-In-Charge was out for a few weeks recuperating from surgery, so I read all of the Experts’ reports in the Legionnaire’s Case against Polo Towers in 2005.

After reading several reports, each of which corroborated the other, I created a grid to note and compare all experts’ opinions by category. I discovered they ALL had the same opinion about most of the issues – including CAUSATION - AND NO ONE EVEN KNEW THAT! The case settled with ALL Plaintiffs within 30 days. (You’re welcome!)

There were MANY OTHERS! I started my legal career using a Selectric typewriter in 1980, and for years, settlement demands were always “3x damages, settle for 2.” In spite of technology, many attorneys were still stuck with that mindset! I helped many solve that problem.

EXPERIENCE

1985-present My passion and “specialty” has been the identification of *Traumatic Brain Injuries* (many times early in the case, sometimes a few years into the case, sometimes right before trial, and I even turned a defense verdict into a policy limits settlement AFTER the last witness testified at trial!) I was also responsible for the coordination of everything for the attorneys and clients, including identifying the best treating physicians, therapists, and expert witnesses for **TBI cases**, when appropriate. (For many cases, a revised/updated Demand was needed. I prepared that with all of the updated diagnoses with corresponding CPT codes, before & after charts, and other graphics and exhibits that were unique for each client’s situation, many became my famous 40-page demand!)

Without exception, for 30+ years, I looked at each case and client as a challenge. I researched and dug deeper. Not taking everything at face value paid off innumerable times. I found that there was always something else that had been missed, ignored or overlooked. I always gave each case 110% or more, and the more challenging it was, the more determined I was to figure it out. Even when on the surface, there was nothing to figure out. The clients and attorneys didn’t even know there was more. I am empathetic and could always sympathize and relate to our clients. I took the time to listen to them, which they appreciated. Many told me they had never shared that information with their doctors, family members or attorneys. Some told their doctors about their weird symptoms, but got an “eye roll” and they stopped talking. A very high percentage of those clients had a traumatic brain injury, but were afraid to tell anyone what they were experiencing because they didn’t want anyone to think they were crazy. Many were afraid they would lose their job. Since I could relate to most of their symptoms, after I shared a bit of my own story, the floodgates opened!

There are **MILIONS OF PEOPLE*** out there suffering needlessly and for far too long simply because they’re ashamed, embarrassed, or they just don’t understand what’s happening to them. Many think they’re going crazy and don’t want to tell anyone. Many clients say they don’t like to complain. (Unfortunately, there were also times when clients told me that they DID tell their doctor(s), but it was not documented in their chart.)

***Over 2.85 million traumatic brain injuries (TBI) occur each year – or...**

ONE every 11 seconds! [LoveYourBrain](#)

***... 30-50% of TBIs are not recognized or diagnosed at the time of the injury.** This can be due to a variety of factors, including the individual's reluctance to report symptoms, lack of awareness, or the subtle nature of some TBI symptoms. [TBI Data | Traumatic Brain Injury & Concussion | CDC](#)

The Brain Trauma Foundation states: **The most underreported, under diagnosed and underestimated brain trauma by far is concussion.** ***Concussion accounts for 90% of TBI with millions of trauma cases every year.** <https://braintrauma.org/>

***Traumatic Brain Injury After-Effects Show Up in Adults.** TBI may cause of cognitive, mood, energy, motor, and coordination problems... **A significant number of TBIs are not diagnosed immediately after an accident. Symptoms can manifest months or even years later,** making it crucial to consider long-term effects. [Traumatic Brain Injury After-Effects Show Up in Adults | Psychology Today](#)

December 2024 to present (Las Vegas, NV) **TBI-ID.com** Founder & TBI Consultant.

- Established a specialized service to support attorneys, and their clients by identifying symptoms of a Traumatic Brain Injury (TBI).
- Conduct client interviews to assess and document positive TBI symptoms, impact on activities of daily living (ADLs) and enjoyment of life, with detailed notes, duration, and symptom rating by severity.
- Generate comprehensive reports, including detailed symptom list (*literally, from head to toe*), applicable codes for each symptom, treatment, etc. and case valuation impact for each category of symptoms, by levels of severity and duration.
- Reference and Educational materials for attorneys, and Reference and Educational materials with links to self-rehabilitation therapy videos, articles, websites and more, for their clients.

May 2017-December 2019 (Las Vegas, NV) **MEDICAL LITIGATION PARALEGAL, HOWARD & HOWARD** (Martin Little, Esq.)

Handled all aspects of the cases from client intake through trial. Analyzed liability and damages, identified additional damages, retained and worked with experts. Prepared comprehensive and detailed timelines/medical chronologies. Drafted complaints, custom discovery, comparative analysis charts, all mediation briefs, etc. Developed strategies to maximize settlement, resulting in 6-8 figure settlements. Also handled insurance defense cases (personal injury) for two national clients, business/civil litigation – discovery through trial. **Turned one defense case in which Plaintiff claimed millions in damages, into \$10,000 during mediation.** I reviewed 20 years of his US Army medical records and discovered **20 years of dishonesty and fraud.** Mediator, Joe Bongiovi, told him he was lucky they were not going to turn him in.

February 2013-May 2017 (Las Vegas, NV) **MEDICAL LITIGATION PARALEGAL**, JOLLEY URGA WOODBURY & LITTLE (Martin Little, Esq. & Bruce Woodbury, Esq.) [*See #1 above.*]

Handled all aspects of the cases from client intake through trial. Analyzed liability and damages, identified additional damages, retained and worked with experts. prepared comprehensive and detailed timelines/medical chronologies. Drafted complaints, custom discovery, comparative analysis charts, all mediation briefs, etc. Developed strategies to maximize settlement, resulting in numerous 6-8 figure settlements. Also handled insurance defense cases (personal injury) for two national clients, business/civil litigation – from discovery through trial.

January 2009-February 2013 (Las Vegas, NV) **MEDICAL LITIGATION PARALEGAL**, LEWIS BRISBOIS BISGAARD & SMITH (Keith Weaver, Esq; Marc Cwik, Esq; Tracey Heinhold, Esq.)

Handled all aspects of medical malpractice defense cases from discovery through trial. Analyzed liability and damages. Heavy medical record review; prepared comprehensive and detailed timelines/medical chronologies. Worked with medical experts to mitigate damages.

2008 TO PRESENT (Las Vegas, NV)

PRIVATE INVESTIGATOR (unarmed) HS BRANDS GLOBAL (FKA Howard Services)

“Mystery Shopping” assignments for governmental entities, national and state banks and other financial institutions, as well as national chains, et al. to evaluate/confirm compliance with Federal and State laws and regulations, etc.

Private Investigator. NPLB License No.: R2019-14379 (Unarmed)

EDUCATION

Purdue University, West Lafayette, IN - Biology/Pre-Med (1 year)

Indiana University/Purdue University, Indianapolis, IN - Biology/Pre-Med (No BS degree - Motor vehicle accident caused serious **Traumatic Brain Injury (TBI)** during February of junior year, many symptoms including impaired memory and cognitive skills, and inability to do math ~ for several years)

REFERENCES

1. **The Honorable Ronald Israel (EJDC, Dept 28) (Law Offices of Leland Lutfy 1984-86)**
 - o **Phone:** (702) 671-3631
2. **The Honorable Joseph Hardy (EJDC, Dept 15) (2005-2008)**
 - o **Phone:** (702) 671-4412
3. **Mark J. Mills, JD, MD (Expert, Forensic Psychiatrist) (2013-present)**
 - o **Phone:** (301) 310-2335 | **Website:** markjmill.com

4. **Bruce Woodbury, Esq. (Jolley Urga Woodbury & Little; currently Woodbury Law) (2013-2017)**
 - o **Phone:** (702) 933-0777
5. **Nathan Costello, Esq. (formerly with Vannah Costello et al) (1999-2004)**
 - o **Phone:** (702) 566-9782
6. **Dale Swope, Esq. (Law Offices of Dale Swope 1991)**
 - o **Phone:** (813) 273-0017 (Cell)
7. **Steven L. Day, Esq. (Day & Associates) (formerly w/Cohen Johnson Day & Clayson; and Alverson Taylor) (1990-1991; 1998-1999)**
 - o **Phone:** (702) 309-3333

A Few More Career Highlights

Ronald Israel, Esq. (nka The Honorable Ronald J. Israel) – Law Offices of Leland Lutfy – We all worked on the Hilton Fire case, but I worked with him on personal injury cases, as well. I figured out how one perplexing accident happened that wasn't possible the way it was described in the report. My analysis, although bizarre, explained the damage and injuries. He told me quite a few times that I was more intelligent than most attorneys he knows. He did NOT want to share me with any of the other attorneys. (1984-1986, LV)

Richard Myers, Esq. – Crockett & Myers (Barbara Buckley interviewed me and gave the thumbs up for Mr. Myers to hire me (1986-1987, LV) I found "hidden" damages mostly related to TBI many times talking to the clients during monthly follow up calls because clients didn't want to tell their doctors what they were really experiencing because they didn't want anyone to think they were crazy!!! And even when they DID tell their primary or chiropractor, the seemingly "unrelated" symptoms were rarely documented back then!!!!

Richard Fried, Esq. - Cronin Fried – My preparation for trial included independently formulating the strategy for the deposition of the Defendant's (United States for Tripler Army Med. Ctr.) expert on fat embolism. I read 100's of articles that he wrote on fat embolism. I created a document using multiple categories, then added quotes from 30 articles he had published. Mr. Fried used my document to take the deposition. The defense expert was forced to "admit" during his deposition and then at trial that he actually supported our traumatic brain injury case. Fat emboli after MVA caused Plaintiff's hypoxia, but 6 interns and residents failed to simply administer oxygen when the equipment showed extremely low readings! They thought the equipment was malfunctioning!!! I also created a side-by-side timeline to hold up for the Judge of all of the doctors' deposition testimony that unfortunately showed how incompetent they were!!! I turned a defense exhibit regarding how people who lived in the Andes Mountains could survive with low oxygen levels, into an exhibit for Plaintiff. Defendant had failed to note the last section that discussed people who had been seriously injured in an accident, had a severely low oxygen level, and needed immediate treatment with oxygen!! I took notes during testimony and quickly prepared re-direct questions for our expert after defense expert testified. Judge David Ezra looked directly at me the entire time he read his decision to waive caps and awarded the largest medical mal award in State's history, at the time, \$5.5 million. (1988, Honolulu)

Larry Takumi, Esq. - Cades Schutte Fleming & Wright had requested me as Temp – they had been on Exclusively Legal’s waiting list for over a year waiting for me to become available. I became available in 1989 (Honolulu). Larry Takumi had been a partner for 20 years. He was a perfectionist, very demanding, and could be extremely rude and condescending to other people. He couldn’t keep an assistant, most of them were actually scared of him and said they had nightmares! On my first day, I found a \$2 million error in a Buy-Sell Agreement for the sale of his client’s ranch on Kauai. Over the first week, I did more “amazing” things for him, and he called the Office Admin and told her to hire me now, and that I couldn’t work for anyone else! Only for him! Among other things, I routinely found things he missed. I also questioned things just to confirm when it wasn’t 100% obvious, when appropriate. He told me many times – “Sometimes I forget you’re Haol’e!” (1989-1990)

Dale Swope, Esq. – Mr. Swope had a stack of resumes at least a foot high on the corner of his desk the day he interviewed me. Mine was on the top. I asked him if I was the first interview. I was. When he asked me after the interview if I had any questions, I asked him, “*When do I start?*” I reminded him that he brought me in first, and was impressed with what he heard...so why waste time interviewing anyone else. I started the next day. Among many other things that I did while I worked for him, I “Found” the witness to corroborate that the client had been wearing her seatbelt, when there actually were **NO WITNESSES** who could say that since client was found unconscious on the floor on the passenger side of her car. I proved the day after Dale gave me the assignment that she had been wearing her seatbelt - **with her own medical records** - which documented the classic bruising from the seatbelt! They settled for policy limits of **\$2 million**, after 2+ years while he, et al. tried to find a witness to testify at trial! After I “relinquished” my position so his former paralegal could have her old job back, the following year he sent a private investigator out to look for me so he could offer me a new job – to help him and a physician/attorney open a new medical malpractice law firm. We did.

Bill Wagner, Esq. – Wagner Vaughan & McLaughlin (1992-1994) Many TBI’s were identified. I had to point out “basilar fracture” on the initial radiology report to the EXPERT during break on the last day of trial. That confirmed his PROBABLE diagnosis, as a DEFINITIVE diagnosis. Once again, words dictated for the narrative in the radiology report didn’t make it into the SUMMARY. [I had pointed that out MONTHS prior to trial in a notebook analysis of the case I had prepared for their Mediation! The attorneys had most likely ignored it because I was so new and they didn’t know what I could do...yet!!] The “imminent” defense verdict turned into a policy limits settlement of \$600,000 after the break! I identified many TBIs just by following up with clients for a status check each month. Many clients were afraid to talk about their “weird issues” with their family and doctors! After cognitive rehab, one client’s daughters moved back home, and she was able to get her old management job back in the IT department at the University of Florida, in Tampa. She even got engaged to a man she met at work! (She had been suicidal, and could hardly remember anything about how to do her job!) Several clients had my home phone number. I did a suicide crisis intervention with two of them!!! One was during the Super Bowl!!!

Cherie Parker, Esq – Parker & Hansen (1998) (*Please see attached Letter*) One of the cases involved a young man in the Coast Guard who had sustained a lumbar spine injury in an auto accident, and was not able to perform his duties. His physicians ordered x-rays and other diagnostic studies, all of which showed positive findings. The UIM insurance company retained a physician to provide a report (policy limits were 6 figures). His report was “normal” at each level. I called each radiologist, and told each doctor what the carrier’s radiologist said in his report. So, we went over the films and findings for each level of the lumbar spine, for each radiologist, on each study. I prepared the analysis for each radiologist. I had a printer blow up each image with my analysis below, and the carrier’s physician’s findings next to everything for comparison. I had everything blown up to mount on a 3x4’ white board, and had it laminated. I hand-delivered that proposed trial

exhibit (still wet!) to the adjuster. She called Ms. Parker with the policy limits offer within an hour!!! I had not even returned to the office yet!

Nathan Costello, Esq. – Vannah Costello – I met him on the phone when we were on opposing sides and I frequently had to call him about his client’s case. I reached out to him for contract work after I was one of three new hires who were downsized. He offered me a full-time position. I was hired to replace his legal secretary who had recently passed away. I became his secretary/assistant/paralegal/law clerk, and much more - absorbing additional positions (including the 3 associates who quit, since I did much of their work, at Mr. Costello’s request). He was also an Arbitrator, and he asked me to read the briefs, provide my analysis, and award recommendation. I wrote all of his mediation briefs for Joe Bongiovi. He was also a real estate developer, and he worked on construction defect cases involving Strip properties. I had to work on all of the real estate matters, as well. I also reviewed medical records for cases they were going to turn down, and identified why some of them were actually good cases. The attorneys did not understand TBIs and other unusual neurological injuries. Many clients simply needed a new treating physician who understood TBIs, and other unusual injuries. Many cases settled for six figures, instead of minimal damages for soft tissue injuries. (1999-2004)

2005-2008 Temp, Benson Bertoldo Baker & Carter; then Bullivant Houser Bailey for Shareholder in Charge. Firm downsized by 90% including MY ATTORNEY (S-I-C) due to the Economy. (2009-2013 Lewis Brisbois – med mal defense paralegal)

Bruce Woodbury, Esq. & Martin Little, Esq. – Jolley Urga Woodbury & Little – A headhunter I had worked with for 20 years contacted me about their open paralegal position, for which I was hired. I told the headhunter to let them know that I would accept the lowball offer plus \$1000, but that in the first two weeks, I will prove to them that I am worth the max end of the salary range. I proved it on the second day. A case against a utility company which they had been working on for two years, was a serious TBI case they didn’t even know about. There was TWO WORDS in the MRI report that the radiologist failed to put in the summary. I READ THE NARRATIVE and saw the word. Not one doctor saw it. What the attorneys had thought was a soft tissue/emotional damages case (~\$250,000) became a \$multi-million settlement (7-8 figures) for the client!

(I found many “hidden injuries” and “hidden damages” in many other cases for them over the years.)

Bruce Woodbury and his partner, David Malley, came into my office one afternoon and asked me to look at an accidental death claim that had been rejected by the carrier. The Statute was about to run and they wanted to see if I could do something. I figured it out in front of them and told them I’d call my forensic Pathologist to run my analysis by her. When they were walking out of my office, Bruce told David, “See, I told you SHE could do it!” The pathologist agreed with me. She prepared her report. His client (a Bank executive, son of the decedent) received the entire policy amount, less \$10,000 just because the carrier wanted to mess with him. It wasn’t justified, but the policy limits were \$250,000 and he was happy with the \$240,000.

(2013-2017) Martin Little left Jolley Urga and went to Howard & Howard 2017-2019. The Board of Directors decided they did NOT want him to take ANY MORE contingency fee cases, so my PI paralegal position (after working for Mr. Little for 7-1/2 years) was abruptly eliminated on December 11, 2019.