

Your honors , members of the jury and counselors

May it please the court

I am here representing the defendant Martin Memorial Hospital.

I'm here today to tell you the story that you just heard from a different point of view Mr. Jimenez came into Martin memorial hospital in February 28, 2000 , after he was severely injured in a car crash, Martin memorial hospital treated mr. Jimenez for 4 months without any cost due to the fact that mr. Jimenez was an illegal immigrant with no insure , in June 2000 after mr. Jimenez was stabilized Martin memorial hospital transferred mr. Jimenez to a nursing, 6 months later mr. Jimenez was readmitted into the hospital where they once again stabilized him and gave him the proper care that he needed without any cost after looking for ways on how to relocate mr. Jimenez, Martin memorial, after filing a court order in were they were granted the petition and also after speaking to the Guatemalan health minister who assured that " Guatemala was prepared to care for mr. Jimenez" martin memorial made the decision to transfer mr. Jimenez back to Guatemala, at that point mr. Jimenez had already been in the care of Martin memorial hospital for almost three years and he was already stabilized. In his transfer he was accompanied by one of the nurses at Martin memorial and our own expert witness who will testify about how the equipment in Guatemala looked qualified to care for mr. Jimenez, and how Martin memorial was just following the law and how there was nothing more that they could of have done for mr. Jimenez after that.

The fact that mr. Jimenez was released after a month it's sad but that responsibly and that decision doesn't fall into Martin memorial anymore.

Martin memorial does not have the resources for long term care and they already did what they could for mr. Jimenez, he had to be discharged and since he was an illegal immigration Martin memorial hospital could not just throw him out into the streets or send him to a home in the U.S because that would have been illegal. They had to look for the best solution possible so they transferred him to his country in where martin memorial was assured that he was going to be cared for after that there is not much that martin memorial could of have done.

Thank you your honors , members of the jury.