

To: D. L. Hass, Attorney at Law for the defense in *Summers v. Hard*
From: Dr. Ennis Martinez, Ph.D.
Re: Evaluation of Report by Dr. Pat Gage
Date: April 1, 20XX+1

Dear Mr. Hass:

You have asked me to review a report and file notes created by Dr. Pat Gage to assess Dr. Gage's determination that Deborah Summers suffers from chronic Post-Traumatic Stress Disorder, as defined by DSM-IV. The following explains my conclusions that Dr. Gage's diagnosis is not supportable under the information reported and the standards of our profession:

1. Dr. Gage's entire analysis is based upon her subjective clinical judgment, relying on her observations and the self-reporting of Ms. Summers. While clinical assessment is certainly an appropriate part of a diagnosis, Dr. Gage fails to have Ms. Summers take any of the psychological tests that are standard instruments in the diagnosis of PTSD:
 - Personality Assessment Inventory (PAI)
 - Minnesota Multiphasis Personality Inventory-2 (MMPI-2)
 - Beck Depression Inventory-II (BDI-II)
 - Posttraumatic Stress Disorder Scale (PDS)
2. While self-reporting of the patient is normal in such a diagnosis, there are particular concerns with the source of information in this case. Ms. Summers did not seek Dr. Gage for treatment, but as the result of arrangement made by her attorneys in a civil damages lawsuit. Ms. Summer's motivation to exaggerate her symptoms and dissemble is obvious in this situation where the doctor is being sought solely to make a diagnosis for use in enhancing a damage claim. That Ms. Summers has previously suffered from PTSD which according to some literature is a predisposing factor in future PTSD episodes) makes such possible manipulation of Dr. Gage even more of a concern since Ms. Summers would be intimately familiar with the symptoms of PTSD.
3. Ms. Summers has a history of depression, and a genetic predisposition to depression (her mother and aunt both take antidepressants). Her symptoms, to the extent that they are authentic, are likely to result from her life-long malady, rather than witnessing the fatal shooting of her new husband.

4. Ms. Summer's dating and ideation of remarriage within two months of the shooting is in absolute contradiction to any forensic claim that Ms. Summers is experiencing a "feeling of detachment or estrangement from others," or a "restricted range of affect (e.g., unable to have loving feelings)." DSM-IV, §309.81(c)(5)(6).

Please contact me if I can be of any further assistance.

Ennis Martinez, Ph.D.

Dr. Ennis Martinez, Ph.D.
Clinical Psychologist