# NOTICE OF INTENT TO UTILIZE LEARNED TREATISES AT TRIAL

##### State of Wisconsin

PLEASE TAKE NOTICE that the State of Wisconsin, by its attorney, D., hereby reserves the right to utilize learned treatises during the jury trial of the captioned action, pursuant to the provisions of sec. 908.03 (18) (a), Stats.

Specifically, the State reserves the right to utilize any portion of the following treatises at trial, true and accurate photocopies of which are attached to this Notice.

1. ***Child Abuse: Medical Diagnoses and Treatment***, edited by Reese, Robert M., M.D., 1994, Lea & Febiger, pp. 1-22;
2. *Child Maltreatment: A Clinical Guide and Reference*, Chapter 5: ed. James A. Monteleone, M.D., “Ophthalmic Manifestations of Child Abuse,” Cruz, Oscar A., M.D. and Davitt, Bradley V., M.D., 2d ed. 1998, G.W. Medical Publishing, Inc., pp. 79-86;
3. *The Journal of Trauma*, Vol. 31, No. 10, “Pediatric Falls from Heights,” Musemeche, Catherine A. et al., 1991, Williams & Wilkins, pp. 1347-1349;
4. *The Journal of Trauma*, Vol. 31, No. 10, “Injuries in Infants and Small Children Resulting from Witnesses and Corroborated Free Falls,” Williams, R.A., M.D., 1991, Williams & Wilkins, pp. 1350-1351;
5. *The Journal of Trauma*, Vol. 31, No. 10, “Deaths from Falls in Children: How Far is Fatal?” Chadwick, David L. M.D. et al., 1991, Williams & Wilkins, pp. 1353-1355;
6. *The Journal of Trauma*, September, 1989, “The Mortality of Childhood Falls,” Hall, John R. M.D. et al., 1989, Williams & Wilkins, pp. 1273-1275;
7. *Pediatrics*, Vol. 75 “Serious Head Injury in Infants: Accident or Abuse?,” Billmire, Elaine M. M.D. and Myers, Patricia A. MSW, American Academy of Pediatrics, 1985, pp. 340-342;
8. *Journal of Pediatric Surgery*, Vol. 18, No. 4, “Ten Years of Experience with Falls from a Height in Children,” Barlow, Barbara et al., Grune & Stratton, Inc., pp. 509-511; and
9. *The Journal of Trauma*, Vol. 15, No. 11, “Injuries in Children Sustained in Free Falls: An Analysis of 66 Cases,” Smith, Melvin D. M.D. et al., Williams & Wilkins, 1975, pp. 987-991.

Dated at \_\_\_\_\_\_\_, Wisconsin this \_\_\_\_\_ of \_\_\_\_\_, 1999.

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Assistant District Attorney