

EXHIBIT 37

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

KATHLEEN MOLLER,

Plaintiff,

v.

**MARTIAN SALES, INC.; JOPEN,
LLC; JOHNSON FOODS, LLC; LP
IND., LLC; CAG HOLDINGS, LLC;
RMH HOLDINGS, LLC; ABC
INSURANCE COMPANY and John
Does 1-4,**

Defendants.

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CIVIL ACTION NO.

2:24-CV-228-WBV-DPC

THE HONORABLE WENDY B. VITTER

**MAGISTRATE JUDGE DONNA PHILLIPS
CURRAULT**

EXPERT REPORT OF ALLEN L. DOLLAR, MD, FACC, FACP

1. I have been asked by counsel for the Defendant to review the medical records of Harmony Moller and to formulate opinions as to her cause of death. My fees for reviewing materials, preparing my report, and testifying at a deposition are \$700/hour. My fees for trial testimony are \$6,000/day. My compensation is neither contingent on the outcome of this matter nor the conclusions reached in this report.

2. In background for my qualifications to render an opinion: I am a board-certified cardiologist with 33 years in clinical practice. I am employed as an Associate Professor of Medicine, Division of Cardiology, in the Emory University School of Medicine. My current CV is attached as Appendix A, and my list of materials considered is attached as Appendix B. My list of prior cases in which I have testified is attached as Appendix C.

CLINICAL SUMMARY

3. Harmony Moller was 36 years old at the time of her death on February 6, 2023. She had no significant past medical history. On the day of Ms. Moller's death, her mother,

Kathleen Moller found her daughter unresponsive and called 911. The EMS crew attempted to resuscitate her, but their efforts were to no avail, and she was pronounced dead at the scene.

4. Her autopsy, apart from her heart, had no findings suggestive of a cause of death.

5. Toxicology reports from NMS Labs revealed the presence of caffeine, naloxone, THC, diphenhydramine, and promethazine. Mitragynine was present in a concentration of 150 ng/mL.

6. Toxicology reports from UCSF Clinical Toxicology revealed mitragynine was present in a concentration of 158 ng/mL.

7. The cardiac portion of the autopsy revealed that her heart weighed 421 grams, which is heavier than normal (up to 411 grams would be normal per the autopsy report). The autopsy report also notes “mild biventricular enlargement” meaning that there was enlargement of both ventricles, the bottom chambers of the heart.

8. The autopsy notes: “The left coronary artery arises 5 mm above the left sinotubular ridge with an acute angle of origin. There is an inferior aortic wall flap over the origin of the left coronary artery.”

9. The autopsy report ascribes the cause of death to an “abnormally high left coronary ostia takeoff exacerbated by mitragynine.”

OPINIONS

There is no evidence that mitragynine would exacerbate any propensity of a high takeoff of the left coronary to cause sudden death.

10. The autopsy suggests that mitragynine “exacerbated” the high takeoff of the left coronary ostium, but this association has never been observed, nor has anyone postulated such an association in medical literature. The authors of the autopsy report propose no mechanism

whereby mitragynine could potentially induce sudden death in someone with an abnormally high left coronary artery.

Ms. Moller's mitragynine levels were quite low.

11. Ms. Moller had mitragynine in her serum at autopsy at a concentration of either 150 ng/mL (according to NMS Labs) or 158 ng/mL (according to UCSF Clinical Toxicology). No serum level of cardiac toxicity has been established for mitragynine, but the levels discovered in her serum were very low. A study published in 2021 (1) assessed regular kratom users for evidence of cardiovascular toxicity through the performance of electrocardiograms and echocardiograms.¹ In that study, the subject's serum levels of mitragynine ranged from a low of 2,500 ng/mL to a high of 22,400 ng/mL. The only cardiac effect discovered was a slight prolongation of the QT interval on the electrocardiogram that only appeared in subjects at the higher ranges of mitragynine levels. Ms. Moller's level of 150 or 158 ng/mL were less than a tenth of the lowest level found in this study.

Young people who die suddenly frequently have no cause found at autopsy.

12. Approximately 10-20% of young adults who die suddenly and unexpectedly will have no explanation for their death found at autopsy. The term for this is Sudden Arrhythmic Death Syndrome. Most, if not all, of these individuals with sudden death and a normal autopsy had electrical disorders of the heart (ion channelopathies) during life. These electrical disorders can often be diagnosed during life with an electrocardiogram (ECG), but young adults often have never had an ECG recorded during their lifetime. It is also the case that individuals with ion channelopathies can have a normal ECG- so called "concealed" channelopathies.

¹ Leong Bin Abdullah MFI, Singh D. Assessment of Cardiovascular Functioning Among Regular Kratom (*Mitragyna speciosa* Korth) Users: A Case Series. *Front Pharmacol* 2021; 12:723567.

13. Individuals with ion channelopathies can have fatal heart rhythms triggered by a variety of things including low serum potassium levels and medications that prolong the QT interval on the ECG.

Ms. Moller likely had 2 potential triggers for Sudden Arrhythmic Death.

14. As noted in the St. Tammany Parish Sheriff's Office report, Ms. Moller's mother reported that her daughter had not been feeling well and was throwing up. Vomiting causes a loss of potassium and often leads to low serum potassium levels. As noted above, low serum potassium can trigger Sudden Arrhythmic Death in susceptible individuals.

15. Ms. Moller had also been taking an anti-nausea medication, promethazine (Phenergan), as this was found in Ms. Moller's blood at autopsy, and noted in the St. Tammany Fire District EMS records and on statements made by Kathleen Moller, Ms. Moller's mother, on police bodycam footage. Promethazine is known to prolong the QT interval on the ECG. Also as noted above, a prolonged QT interval can trigger Sudden Arrhythmic Death in susceptible individuals.²

REBUTTAL TO PLAINTIFF'S EXPERT REPORTS

Rebuttal to Dr. Ronald Wharton's Report

16. Dr. Ronald Wharton, Plaintiff's cardiology expert, states that "[s]udden death occurs from either an anatomic or a toxic/metabolic cause. No anatomic cause (traumatic, cardiac, thromboembolic, or neurologic) was identified." He further asserts that the decedent had "no

² Rowe EJ, Shugg T, Ly RC, Philips S, Rosenman MB, Callaghan JT, Radovich M, Overholser BR, Schneider BP, Tisdale JE and Skaar TC (2022) Association of QT interval-prolonging drugs with clinical trial eligibility in patients with advanced cancer. *Front Cardiovasc Med* 9:894623. Jo SH, Hong HK, Chong SH, Lee HS, Choe H (2009) H1 Antihistamine drug promethazine directly blocks hERG K⁺ channel. *Pharmacological Res* 60(5):429-437.

medical history of any condition that would cause a dangerous metabolic derangement,” and concludes that “more likely than not, Harmony Moller died from a cardiorespiratory adverse event induced by consumption of kratom.”

17. Dr. Wharton’s conclusion is incomplete. His statement that there was “no medical history of any condition that would cause a dangerous metabolic derangement” fails to account for Ms. Moller’s documented vomiting on the day of her death. Vomiting is a well-recognized cause of acute hypokalemia, which can trigger malignant ventricular arrhythmias and sudden cardiac death, even in individuals without structural heart disease.

18. Additionally, while Dr. Wharton acknowledges that “VT/VF can be precipitated by exogenous substances,” he focuses solely on mitragynine and omits the significance of the promethazine identified in Ms. Moller’s blood. Promethazine is well-established to prolong the QT interval and is a known precipitant of sudden arrhythmic death in susceptible individuals. His failure to address this co-ingestant materially undermines his causation opinion.

19. Finally, although Dr. Wharton cites the mitragynine concentration of 150 ng/mL found at autopsy, he does not contextualize this value within the medical literature. A concentration of 150 ng/mL is substantially lower than levels reported in cases where individuals died with mitragynine detected post-mortem. Dr. Wharton’s report provides no analysis explaining why a comparatively low concentration should be regarded as lethal in this case.

Rebuttal to Dr. Josef Thundiyil’s Report

20. Josef Thundiyil, MD, Plaintiff’s emergency medicine and medical toxicology expert, asserts that “[t]he blood concentration of mitragynine was 150 ng/mL, a level sufficient to cause adverse events.” He provides no scientific or medical data to support this conclusion. As

noted previously, the mitragynine concentration identified at autopsy is substantially lower than levels reported in the literature in cases where mitragynine has been found post-mortem.

21. Dr. Thundiyl further states, “Promethazine was present at a concentration of 18 ng/mL. Said concentration is not consistent with a fatal or toxic dose.” This ignores the well-recognized fact that promethazine, even at therapeutic levels, can prolong the QT interval and precipitate fatal ventricular arrhythmias in susceptible individuals. His assertion addresses only dose-related toxicity and fails to consider pharmacologic mechanisms of arrhythmogenesis.

22. He also opines that cardiomegaly “may be caused by repetitive use of stimulants, like kratom.” There is no medical literature supporting the claim that kratom causes cardiomegaly. This assertion lacks evidentiary basis and does not meet accepted standards for scientific reliability.

23. Dr. Thundiyl failed to mention that Diphenhydramine, found in Ms. Moller’s serum, may be associated with QT prolongation. Medical literature and the Food and Drug Administration indicate there is a correlation in some patients.³ FDA issued a Drug Safety Communication in 2020 pertaining to consumption of diphenhydramine and heart problems.⁴

24. Finally, like Dr. Wharton, Dr. Thundiyl fails to address Ms. Moller’s documented vomiting on the day of her death, and the reasonable possibility that this resulted in acute hypokalemia, a well-known trigger of malignant ventricular arrhythmias and sudden cardiac death. His omission of this physiologic mechanism further undermines the completeness of his causation analysis

³ Shah A, Yousuf T, Ziffra J, Zaidi A, Raghuvir R. (2015) Diphenhydramine and QT prolongation - A rare cardiac side effect of a drug used in common practice. *J Cardiol Cases* 12:126-129.

⁴ <https://www.fda.gov/drugs/drug-safety-and-availability/fda-warns-about-serious-problems-high-doses-allergy-medicine-diphenhydramine-benadryl>.

CONCLUSION

25. It is likely that Ms. Moller had an undiagnosed electrical issue with her heart, an ion channelopathy. The combination of promethazine and likely low serum potassium levels triggered her sudden fatal heart rhythm.

26. It is also possible that Ms. Moller's abnormally high takeoff of the left coronary artery contributed to her death. If so, mitragynine would not have been contributory to death from this cause.

27. The presence of mitragynine in Ms. Moller's blood was neither causative nor contributory to her death.

Sincerely,

A handwritten signature in blue ink, appearing to read "Allen L. Dollar".

Allen L. Dollar, MD, FACC, FACP

APPENDIX A

Allen L. Dollar

July 1, 2025

EMORY UNIVERSITY SCHOOL OF MEDICINE

1. Name: Allen L. Dollar, MD, FACC, FACP
2. Office Telephone: (404) 616-0539
3. E-mail Address: allen.dollar@emory.edu
4. Citizenship: U.S.
5. Current Titles and Affiliations:
 - a. Academic appointments:
 1. Primary appointment:
2012- Present Associate Professor of Medicine, Division of
Cardiology, Emory University School of Medicine
 - b. Clinical appointments:
2010-2023 Emory Chief of Cardiology, Grady Memorial Hospital
6. Previous Academic and Professional Appointments:
1992-1994 Private practice, Carrollton, GA
1994-2005 Private practice, Atlanta, GA, Cardiology of Georgia, PC
2006-2010 Medical Director, Cardiac Catheterization Laboratory, Grady Memorial
Hospital
2005-2012 Assistant Professor of Medicine, Division of Cardiology
Emory University School of Medicine
7. Licensures/Boards:
Medical License Georgia, 1992
8. Specialty Boards:
1988 Diplomate, American Board of Internal Medicine
1991 Diplomate, ABIM, Cardiovascular Disease

Allen L. Dollar

July 1, 2025

9. Education:

1981	Georgetown University, Washington, DC	BS, Biology
1985	University of Maryland School of Medicine, Baltimore, MD	MD

10. Postgraduate Training:

1985-1986	Intern in Medicine	University of Maryland Hospital Baltimore, Maryland John A. Kastor, MD
1986-1988	Resident in Medicine	Washington Hospital Center Washington, DC James A. Curtin, MD
1988-1990	Senior Staff Fellow	Cardiac Pathology Branch National Heart, Lung and Blood Institute National Institutes of Health William C. Roberts, MD
1990-1992	Fellow in Cardiology	Washington Hospital Center Washington, DC Joseph M. Lindsay, MD
2008	Graduate	Pediatric Executive Training Program, Emory Healthcare
2011	Graduate	Woodruff Leadership Academy Emory Healthcare

11. Committee Memberships:

a. Regional and State:

2005-2008	Founder and President, Atlanta Regional Society of Echocardiography
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b. Institutional:

2005-2008	Cardiopulmonary Resuscitation Committee, Grady Memorial Hospital
2005-2008	Acute Coronary Syndrome Performance Improvement Task Force, Grady Memorial Hospital

Allen L. Dollar

July 1, 2025

2005-2018	Cardiology Service Line Committee, Grady Memorial Hospital
2008-2010	Ethics Committee, Emory University Hospital
2009-2010	Cardiac Clinic Renovation Steering Committee, Grady Memorial Hospital
2009-2010	Intensive Care Unit Renovation Steering Committee, Grady Memorial Hospital
2010-2023	Chief's of Service Committee, Grady Memorial Hospital
2010-2023	Section Chief's Committee at Grady, Department of Medicine, Emory University School of Medicine
2010-2023	Cardiovascular Fellowship Program Oversight Committee
2010-2013	Congestive Heart Failure initiative, Grady Memorial Hospital
2010-2015	Coronary Computed Tomographic Angiography working group, Grady Memorial Hospital
2011-2014	Faculty Counselor, Woodruff Health Sciences Board
2012-present	Global Health Residency Scholars Program Advisory Committee
2013	Search Committee member- Chief Operating Officer, Grady Memorial Hospital
2014-2015	Grady Memorial Hospital Physician Leadership Institute-participant
2014-2021	Grady Memorial Hospital STEMI Leadership Committee
2017	Search Advisory Committee member: Dean, Emory University School of Medicine

12. Editorships and Editorial Boards:

2009-2023	Member, Editorial Board of the <i>American Journal of Cardiology</i>
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13. Manuscript reviewer:

2005-2009	Ad-hoc reviewer for <i>American Journal of Cardiology</i>
2009-present	Ad-hoc reviewer for <i>Clinical Cardiology</i>
2009-present	Ad-hoc reviewer for <i>Geriatric Cardiology</i>

Allen L. Dollar

July 1, 2025

2010-present Ad-hoc reviewer for *Lebanese Medical Journal*

2010-present Ad-hoc reviewer for *American Family Physician*

14. Honors and Awards:

- 1981 Graduated cum laude, Georgetown University
- 1985 Alpha Omega Alpha, University of Maryland School of Medicine
- 1985 Merck Sharp and Dohme Award for Outstanding Senior in Medicine, University of Maryland School of Medicine
- 2004 Atlanta Business Chronicle Health Care Hero Award
- 2004 Channel 11 WXIA TV 11 Alive Community Service Award
- 2004 Piedmont Hospital Nicholas E. Davies Community Service Award
- 2007 Excellence in Teaching Award at Grady Memorial Hospital presented by graduating Cardiovascular Fellowship Class of 2007
- 2007 Nanette K. Wenger Distinguished Service Award, Assistant Professor
- 2009 Excellence in Teaching Award at Emory University Hospital presented by graduating Cardiovascular Fellowship Class of 2009
- 2012 Golden Apple Teaching Award at Grady Memorial Hospital presented by the Internal Medicine Residents
- 2012 Excellence in Teaching Award at Grady Memorial Hospital presented by graduating Cardiovascular Fellowship Class of 2012
- 2013 Golden Apple Teaching Award at Grady Memorial Hospital presented by the Internal Medicine Residents
- 2013 Excellence in Teaching Award at Grady Memorial Hospital presented by graduating Cardiovascular Fellowship Class of 2013
- 2019 Excellence in Teaching Award at Grady Memorial Hospital presented by graduating Cardiovascular Fellowship Class of 2019

15. Society Memberships:

Allen L. Dollar

July 1, 2025

1991	Fellow of the American College of Physicians
1994	Fellow of the American College of Cardiology

16. Grant Support:

a. Active support:
Federally funded:

Co-P.I., Systolic Blood Pressure Intervention Trial (SPRINT)
NHLBI, NIH (Collaborators: NIDDK, NINDS, NIA)
2010-2018

17. Clinical Service Contributions:

1992-1994	Medical Director, Cardiac Catheterization Laboratory, Tanner Medical Center, Carrollton, Georgia
1995-1999	Medical Director, Cardiac Rehabilitation and Cardiac Disease Prevention Program, Piedmont Hospital, Atlanta, Georgia
2006-2010	Medical Director, Cardiac Catheterization Laboratory, Grady Memorial Hospital
2010-2023	Chief of Cardiology, Grady Memorial Hospital
2010-2019	Medical Director, Cardiovascular Services, Grady Memorial Hospital
2010-2023	Cardiovascular Fellowship Program Oversight Committee

18. Formal Teaching:

a. Medical Student Teaching:

2005-2008	Group facilitator, Problem Based Learning Curriculum for M1 and M2 students
2005-2023	Faculty, "Harvey" M4 cardiology elective
2005-2023	Faculty supervisor for Physician Assistant students in outpatient preventative cardiology
2005-2023	Faculty supervisor for M4 students in outpatient cardiology
2008-2021	Faculty lecturer, M1 Cardiovascular Module
2008	Anatomy laboratory instructional assistant, Cardiovascular Module
2011-2018	Faculty, Fundamental Critical Care Support Course

Allen L. Dollar

July 1, 2025

- b. Residency program:
 - 2005-2007 Internal Medicine core curriculum lecture annually, one hour/year
 - 2007-2018 General Surgery residency core curriculum lecture annually
- c. Fellowship program
 - 2005-2010 Cardiac catheterization core lecture series (Grady), monthly
 - 2005-present "How to find a job" lecture series – annual
 - 2005-2019 Cardiovascular fellowship core curriculum lecture - annual
 - 2005-2016 Cardiovascular Grand Rounds at Grady - annual
 - 2010-2023 Conference Facilitator for noon Fellow-Faculty Cardiology conference at Grady every Monday, Wednesday, and Friday.

19. Supervisory Teaching:

- a. Medical Students
 - Jason Brown, 2006-2010, Faculty Mentor. Currently Internal Medicine resident at Emory University
 - Elliot Tapper, 2006-2010, Faculty Mentor
 - Scott Carra, 2007-2009, Faculty Mentor
 - Zacchary Hermes, 2012-2016, Faculty Mentor
- b. Residency and Fellowship Programs
 - 2005-2013 Faculty supervisor for Internal Medicine Residents in outpatient preventative cardiology
 - 2005-2013 Faculty supervisor for Family Medicine Residents in outpatient preventative cardiology
 - 2005-present Attending Cardiologist, Cardiology Consult Service, Grady Memorial Hospital
 - 2005-present Attending Cardiologist, Echocardiographic Laboratory, Grady Memorial Hospital

Allen L. Dollar

July 1, 2025

March 2006	Cardiology Elective in Ethiopia, Dr. Akbar Khan
2006-2010	Attending Cardiologist and Medical Director, Cardiac Catheterization Laboratory, Grady Memorial Hospital
Sept. 2006	Cardiology Elective in Ethiopia, Dr. Vijay Kasi
Nov. 2006	Cardiology Elective in Ethiopia,, Dr. Reza Fazel
2008-2010	Attending Cardiologist, Hurst Inpatient Cardiology Service, Emory University Hospital
2008-2010	Attending Cardiologist, Echocardiographic Laboratory, Emory University Hospital
March 2013	Supervising Attending, Emory Global Health Residency Scholars Program, Addis Ababa, Ethiopia
Feb. 2014	Supervising Attending, Emory Global Health Residency Scholars Program, Addis Ababa, Ethiopia

20. Lectureships, Seminar Invitations, and Visiting Professorships:

a. Institutional Invitations:

March 2006	Visiting Professor, Addis Ababa University School of Medicine, Addis Ababa, Ethiopia Visiting Professor, Gondar Medical College, Gondar, Ethiopia
September 2006	Visiting Professor, Addis Ababa University School of Medicine, Addis Ababa, Ethiopia Visiting Professor, Gondar Medical College, Gondar, Ethiopia
November 2007	Visiting Professor, Addis Ababa University School of Medicine, Addis Ababa, Ethiopia
March 2013	Visiting Professor, Addis Ababa University School of Medicine, Addis Ababa, Ethiopia
February 2014	Visiting Professor, Addis Ababa University School of Medicine, Addis Ababa, Ethiopia

b. Regular Lecture Duties

August 11, 2005	Cardiology Grand Rounds, Grady Memorial Hospital
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Allen L. Dollar

July 1, 2025

“Stress Echocardiography”

August 17, 2006	Cardiology Grand Rounds, Grady Memorial Hospital “Approach to the Patient with Chest Pain”
July 5, 2007	Cardiology Grand Rounds, Grady Memorial Hospital “Management of Acute Coronary Syndromes”
July 3, 2008	Cardiology Grand Rounds, Grady Memorial Hospital “Management of Acute Coronary Syndromes”
March 16, 2009	Emory University School of Medicine, M1 Cardiology Core Lectures “Chronic Ischemic Heart Disease”
July 15, 2010	Cardiology Grand Rounds, Grady Memorial Hospital “Management of Acute Coronary Syndromes”
March 4, 2013	Cardiology Grand Rounds, Grady Memorial Hospital “Broken Hearts: A Cardiologist’s Perspective”
March 11, 2012	Grady Trauma Surgery Conference “Broken Hearts: A Cardiologist’s Perspective”
April 12, 2012	Medicine Grand Rounds, Emory University Hospital Midtown “Broken Hearts: A Cardiologist’s Perspective”
Nov. 27, 2012	Grady Neighborhood Health Center Primary Care Physicians “Medical Management of Stable Coronary Disease”
Nov. 28, 2012	Cardiology Fellows Core Lecture Series “Right-sided cardiac valvulopathies”
March 11, 2013	Grady Trauma Surgery Conference “Fundamentals of Intra-aortic Balloon Counter-pulsation”
May 14, 2014	Cardiology Fellows Core Lecture Series “Fundamentals of Medical Malpractice Law”
June 11, 2014	Cardiology Grand Rounds, St. Joseph’s Hospital “Broken Hearts: A Cardiologist’s Perspective”

Allen L. Dollar

July 1, 2025

c. Invited Presentations

National/International

October 22, 2010 Georgetown University Masters of Health Services Administration Program:
"The View from Grady Memorial Hospital"

Regional

July 14, 2001 Georgia Society of Anesthesiologists Annual Meeting 2001
Sea Island, GA
"Preoperative Cardiac Risk Assessment: "

January 26, 2007 Sixth Annual Medical Surgical Conference, Piedmont Hospital
"The Obesity Epidemic"

March 26, 2008 Georgia State University Ethiopian Student Association
"Status Report: Health Care in Ethiopia"

April 26, 2009 Georgia Free Clinic Network Annual Conference
"Management of Chronic Stable Coronary Artery Disease
(Implications for treating patients when resources are limited)"

September 25, 2010 Morehouse School of Medicine: Heart Failure 2010
"Management of Hypertension in Systolic Heart Failure"

June 8, 2012 American College of Cardiology Georgia Chapter Cardiac Care
Conference, "Eat Less, Live Longer?"

March 24, 2014 Southeast Regional Critical Care Summit
"Shocking Arrhythmias in the Intensive Care Unit"

Institutional

May 22, 2006 Emory Cardiology Conference
"Heart Disease in Ethiopia"

January 5, 2009 Cardiology Morbidity and Mortality Conference
Emory University Hospital
"Cardiac Amyloidosis"

August 27, 2009 Emory University Department of Surgery Core Lecture Series

Allen L. Dollar

July 1, 2025

“Cardiovascular Preoperative Assessment prior to Non-cardiac Surgery”

November 29, 2010 Emory University Department of Surgery, Grady Trauma Service
“Perioperative Myocardial Infarction”

February 27, 2012 Emory University Division of Cardiology Grand Rounds
“Eat Less, Live Longer?”

April 12, 2013 Emory University Hospital Midtown Medicine Grand Rounds
“Cardiac Trauma”

February 3, 2014 Emory University Division of Cardiology Grand Rounds
“Broken Hearts: Physical and Emotional Cardiac Trauma”

June 14, 2014 St. Joseph’s Hospital, Atlanta, Cardiology Grand Rounds
“Cardiac Trauma”

CME Courses

May 12, 2001 Cardiac Nursing Lecture Series Piedmont Hospital
“Cardiac Stress Testing: What Nurses Should Know”

September 24, 2002 State of the Heart 2002
Brasstown Valley Resort, GA.
“Advanced Lipid Management”

September 23, 2003 Clinical Update for Radiologists 2003
Swisshotel, Atlanta, Georgia
“Beyond the Viewbox: What Clinicians Want Their Radiologists to Know: Screening for Coronary Artery Disease”

May 12, 2004 Piedmont Hospital MKSAP Review Course
“Screening for Coronary Artery Disease”

October 19, 2006 Emory University’s Cardiology in Primary Care Conference 2006
“Sex, Drugs, and Gettin’ Old”

October 26, 2007 Emory University’s Cardiology in Primary Care Conference 2007
“The Changing Face of Cardiovascular Disease in the Developing World”

October 18, 2008 Emory University’s Cardiology in Primary Care Conference 2008
“Management of White Coat and Resistant Hypertension”

Allen L. Dollar

July 1, 2025

December 13, 2008	Emory University Advances in Urology 2008 "Preoperative Cardiac Assessment Prior to Urologic Surgery"
August 1, 2009	Emory University Comprehensive Board Review in Internal Medicine 2009 "Management of Chronic Stable Coronary Artery Disease"
October 15, 2009	Emory University's Cardiology in Primary Care Conference 2009 "Management of Resistant Hypertension"
June 2-6, 2010	Emory Symposium on Coronary Atherosclerosis Prevention and Education (ESCAPE), Amelia Island, Florida "Preoperative Evaluation" and "Travels of the Heart"
July 31, 2010	Emory University Comprehensive Board Review in Internal Medicine 2010 "Management of Chronic Stable Coronary Disease"
October 14, 2010	Emory University's Cardiology in Primary Care Conference 2010 Assistant Course Director "Preoperative Risk Assessment: Tricks of the Trade"
July 30, 2011	Emory University Comprehensive Board Review in Internal Medicine 2011 "Management of Chronic Stable Coronary Artery Disease"
October 14, 2011	Emory University's Cardiology in Primary Care Conference 2012 Assistant Course Director "Management of Chronic Stable Coronary Artery Disease"
July 28, 2012	Emory University Comprehensive Board Review in Internal Medicine 2012 "Management of Chronic Stable Coronary Artery Disease"
October 11, 2012	Emory University's Cardiology in Primary Care Conference 2012 Assistant Course Director "Eat Less, Live Longer?"
July 27, 2013	Emory University Comprehensive Board Review in Internal Medicine 2013 "Management of Chronic Stable Coronary Artery Disease"
October 10, 2013	Emory University's Cardiology in Primary Care Conference 2013 Assistant Course Director

Allen L. Dollar

July 1, 2025

"Echo Reports for Dummies"

July 26, 2014 Emory University Comprehensive Board Review in Internal Medicine
2014 "Management of Chronic Stable Coronary Artery Disease"

October 2, 2014 Emory University's Cardiology in Primary Care Conference 2014
Assistant Course Director
"Perioperative Cardiovascular Care"

July 25, 2015 Emory University Comprehensive Board Review in Internal Medicine
2014 "Management of Chronic Stable Coronary Artery Disease"

October 8, 2015 Emory University's Cardiology in Primary Care Conference 2014
Assistant Course Director
"Perioperative Cardiovascular Care"

July 23, 2016 Emory University Comprehensive Board Review in Internal Medicine
2014 "Management of Chronic Stable Coronary Artery Disease"

October 13, 2016 Emory University's Cardiology in Primary Care Conference 2016
"Perioperative Cardiovascular Care"

April 13, 2018 EJCH April 13, 2018 Cardiology Annual Conference
"Pills or PCI- Management of Chronic Stable Coronary Artery
Disease"

October 19, 2018 Emory University's Cardiology in Primary Care Conference 2018
"Perioperative Cardiovascular Care"

Course or Program Direction and Organization

2007-2009 Coordinator of Emory medical student cardiology electives for all four
Emory teaching hospitals and the site coordinator for Grady.

2010-2016 Coordinator of bimonthly Cardiology Grand Rounds, Grady Memorial
Hospital

2010-2023 Coordinator and Facilitator, Grady Cardiovascular Fellows
Conference, every Monday, Wednesday, Friday, 3 hours/week year-
round.

Allen L. Dollar

July 1, 2025

2010-2015	Coordinator, Emory Cardiology Faculty International Education Committee
October 2010	Emory University's Cardiology in Primary Care Conference 2010 Assistant Course Director
October 2011	Emory University's Cardiology in Primary Care Conference 2011 Assistant Course Director
October 2012	Emory University's Cardiology in Primary Care Conference 2012 Assistant Course Director
October 2013	Emory University's Cardiology in Primary Care Conference 2013 Assistant Course Director
October 2014	Emory University's Cardiology in Primary Care Conference 2014 Assistant Course Director

21. Other Activities:

Media:

May 13, 2008	CBS Channel 46 WGCL-TV Atlanta, Georgia, "Heart Attacks Linked to Traffic Jams"
June 9, 2008	CNN, "Advice for Men: Don't Wait to See a Doctor"
June 24, 2008	CNN, "Caffeinated Moms Drink Up to Keep Up"
July 31, 2008	CBS Channel 46 WGCL-TV Atlanta, Georgia, "Sudden Death in Young Athletes"
August 6, 2008	FOX 5 WAGA TV Atlanta, Georgia, "Pulmonary Embolism in a Young Woman"
September 23, 2010	CNN, "Eating Healthy on the Run"
March 2, 2011	WSB radio, "Junk Food and Health"

Allen L. Dollar

July 1, 2025

March 15, 2011	FOX 5 WAGA TV Atlanta, Georgia "Kicking the Junk Food Habit"
April 3, 2014	FOX 5 WAGA TV Atlanta, Georgia "Heart Age Calculator"
April 10, 2015	Atlanta Business Chronicle "Heart Disease Takes Its Toll on Men"
October 28, 2016	Atlanta Business Chronicle "Innovations in cardiovascular medicine and surgery: Better, smaller, less invasive"

22. Bibliography:

a. Published and accepted research articles in refereed journals:

1. Milner MR, **Dollar AL**, Ross E, Pichard AD, Lindsay J. The Acute Hemodynamic Effects of Percutaneous Aortic Valvuloplasty in Elderly Patients. *Clin Res* 1988;36:A302.
2. **Dollar AL**, Pierre-Louis ML, McIntosh CL, Roberts WC. Extensive multifocal myocardial infarcts from cloth emboli after replacement of mitral and aortic valves with cloth-covered, caged-ball prostheses. *Am J Cardiol* 1989;64:410-412.
3. **Dollar AL**, Roberts WC. Retroaortic epicardial course of the left circumflex coronary artery and anteroaortic intramyocardial (ventricular septum) course of the left anterior descending coronary artery: an unusual coronary anomaly and a proposed classification based on the number of coronary ostia in the aorta. *Am J Cardiol* 1989;64:828-829.
4. **Dollar AL**, Roberts WC. Usefulness of total 12-lead QRS voltage compared to other criteria for determining left ventricular hypertrophy in hypertrophic cardiomyopathy: analysis of 57 patients studied at necropsy. *Am J Med* 1989;87:377-381.
5. **Dollar AL**, Wallace RB, Kent KM, Burkhart MW, Roberts WC. Mitral valve replacement for mitral lipoma associated with severe obesity. *Am J Cardiol* 1989;64:1405-1407.
6. Klues HG, **Dollar AL**, Roberts WC, Maron BJ. Diversity of mitral valve structure in patients with hypertrophic cardiomyopathy: evidence for a

Allen L. Dollar

July 1, 2025

primary mitral valve abnormality (abstr.) *Circulation* 1990;82 (suppl III):III-293.

7. Roberts WC, **Dollar AL**. Extreme obstruction to left ventricular outflow by a bioprosthesis in the mitral valve position. *Am Heart J* 1991;121:607-608.
8. **Dollar AL**, Roberts WC. Morphologic comparison of patients with mitral valve prolapse who died suddenly with patients who died from severe valvular dysfunction or other conditions. *J Am Coll Cardiol* 1991;17:921-931.
9. Gertz SD, Malekzadeh S, **Dollar AL**, Kragel AH, Roberts WC. Composition of atherosclerotic plaques in the four major epicardial coronary arteries in patients greater than or equal to 90 years of age. *Am J Cardiol* 1991;67:1228-1233.
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Allen L. Dollar

July 1, 2025

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1. Cantwell JD, **Dollar AL**. ECG variations in college athletes. *The Physician and Sportsmedicine* 1999;27:9

Allen L. Dollar

July 1, 2025

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4. Green JL, Sawaya FJ, **Dollar AL**. The effects of caloric restriction on health and longevity. *Curr Treat Options Cardiovasc Med* 2011; 13(4):326-34.

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1. **Dollar AL**. Aortitis: Inflammatory and infectious diseases of the aorta. In: Diseases of the Aorta, Lea & Febiger, Philadelphia, 1994.
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5. Eapen D, Achtchi A, Nieva R, Valiani K, Zarreen F, Patel A, **Dollar A**, Isiadinso I, Parashar S, Baer J, Mavromatis K, Sperling L. Impact of preventative therapies on clinical management and outcomes. In: Atherosclerosis: Risks, Mechanisms and Therapies, John Wiley & Sons, Inc., Hoboken, NJ, 2015.
6. Bhargava A, **Dollar AL**. Prosthetic Valve Disease. In: Handbook of Inpatient Cardiology. Springer, Switzerland, 2020.

d. Other publications:

Allen L. Dollar

July 1, 2025

1. **Dollar AL.** Sojourn to Ethiopia. *J Med Assoc Ga* 2001;90:20-22.
2. **Dollar AL.** I think Mesfin has endocarditis. *Am Coll Physicians Ga Chapter Governor's Newsletter*, Dec 2008.
3. **Dollar AL.** Innovations in cardiovascular medicine and surgery: Better, smaller, less invasive. *Atlanta Business Chronicle*, Oct 28, 2016.

APPENDIX B

In preparation for this letter of opinion, I have reviewed:

- Case Documents:
 - Third Amended Complaint
 - Plaintiff's Initial Disclosures
 - Plaintiff's Answers to Defendant JOpen, LLC's First Set of Interrogatories, dated 1/2/2025
 - Plaintiff's Supplemental Responses to Requests for Production of Documents, dated 9/9/2025
 - Plaintiff's Supplemental Answers to Interrogatories, dated 9/9/2025
 - Plaintiff's Expert Reports, produced November 18, 2025
- Plaintiff's Production
 - MOLLER_000001
 - MOLLER_000002
 - MOLLER_000003
 - MOLLER_000007–16
 - MOLLER_000017–22
 - MOLLER_000023–24
 - MOLLER_000025–26
- Third Party Productions
 - Autopsy report, including the separate report on the evaluation of the heart performed at the Jesse E. Edwards Registry of Cardiovascular Disease, JEERCD000001–07
 - St. Tammany Parish Sheriff's Office Incident Report, STPSO000001–000018
 - Records from the St. Tammany Parish Coroner's Office
 - Crime Scene Photos produced by St. Tammany Parish Sheriff's Office
 - TRUEPILL000001–03
 - 911 call made by Kathleen Moller
 - Excerpts from STPSO000022_(Extraction_1.1)_127_HWY_22_E-4.mp4
 - Toxicology report from NMS Labs
 - Toxicology report from UCSF Clinical Toxicology
 - St. Tammany Fire District #4, Patient Care Record
 - Paradigm Health System (certification of lack of records)

- ASPEN0000001–12
- LIFENET000001–08
- The following records from the Louisiana Organ Procurement Agency:
 - LNH Chart
 - Audio Recording of call between Kathleen Moller and LOPA Representative
 - Cardiectomy Report
 - Louisiana Organ and Tissue Donor Registry Verification
- Obituary, Harmony Anne Moller, <https://www.dignitymemorial.com/obituaries/covington-la/harmony-moller-11148925>
- *Mother Blames Companies Behind Kratom for Daughter's Death*, LEGAL NEWSLINE, Chris Dickerson, https://www.legalnewsline.com/louisiana-record/mother-blames-companies-behind-kratom-for-daughters-death/article_7c3ae0f1-0293-548c-9556-fd7911ae275e.html (February 28, 2024)
- The following Facebook Posts
 - Mande's Restaurant, dated February 15, 2023, linking Harmony Moller Obituary, <https://www.dignitymemorial.com/obituaries/covington-la/harmony-moller-11148925>, and comments
 - Kathi Moller's post, dated August 6, 2023, and comments
 - Kathi Moller's post, dated February 8, 2023, and comments
 - Kathi Moller's post, dated April 13, 2024, and comments
 - Kathi Moller's post, dated April 12, 2024
 - Kathi Moller's post, dated December 5, 2023
 - Kathi Moller's post, dated November 12, 2023
 - Kathi Moller's post, dated April 7, 2023
 - Kathi Moller's comment on Mande's Restaurant's post, dated February 15, 2023
 - Kathi Moller's post, dated May 29, 2023, and comments
- HIPAA Compliant Authorization for Release of Protected Health Information/Records

APPENDIX C

Listing of testimony by deposition and trial for Allen L. Dollar, MD

			DEPOSITION	TRIAL	PLAINTIFF	DEFENDANT	ATTORNEY	LAW FIRM
1	Defense	MedMal	1/28/22		Starr	Kurian	Travase Erickson	Saalfeld Shad, Jacksonville
2	Defense	MedMal	2/14/22		Meekins	University of Maryland Medical System	John Fischel	Brady Fischel & Daily, LLC, Baltimore, MD
3	Defense	MedMal		3/10/22	Johnson	Bates	Jim Purcell/Kyle Waddell	Fulcher Hagler, Augusta, GA
4	Defense	MedMal	3/16/22		Anderson	Lawhorne	Ben Lingle	Oliver Maner, Savannah, GA
5	Defense	MedMal	3/17/22		Braun	Brizendine	Erin Hess	Reminger, Cleveland, OH
6	Defense	MedMal	7/22/22		Leipper	Melidona	Chad Burgess	Hill Ward Henderson, Tampa, FL
7	Defense	MedMal	8/25/22		Dale	Sumner	Kyle Perry	Fulcher Hagler, Augusta, GA
8	Defense	Personal Inj	8/29/22		McClure	Stith/State Farm	Brian McClCarthy	Waldon Adelman Castilla Hiestand & Prout, Atlanta
9	Defense	MedMal	12/13/22		Bryant	Norton Healthcare	Ashley Butler	Stoll Keenon Ogden, PLLC, Louisville, KY
10	Defense	MedMal	2/9/23		Nicholson	Vevera/Northside	Ngan Nguyen/Hank Scrudder	Scrudder Bass, Atlanta
11	Defense	MedMal	3/2/23		Viherek	Lakeland	Ethen Shapiro/Chad Burgess	Hill Ward Henderson, Tampa, FL
12	Defense	MedMal	3/28/23		Rogers	Northside	Hope Vernon	Scrudder Bass, Atlanta
13	Defense	MedMal	4/3/23		Johnson	Piedmont Rockdale	Sharonda Barnes	Huff Powell Bailey, Atlanta
14	Defense	MedMal	6/2/23		Craig	Kalus	Dirk Riemenschneider	Buckingham Law Firm, Akron, OH
15	Defense	MedMal	6/6/23		Dodd	Baggett	David Mackenzie	Huff Powell Bailey, Atlanta
16	Defense	Personal Inj	7/20/23		Barrett	Seabolt	Amber O'Connell	Swift Currie, Atlanta
17	Defense	MedMal	8/18/23		Wolford	Riverside Health	Bret Jessee	Hall Prangle Schoonveld, Chicago
18	Defense	MedMal	11/13/23		Mendelo	Schramm	Brian Trulock	MMPO Defense, Atlanta
19	Defense	MedMal	11/28/23		Mull	LRMC	Chad Burgess	Hill Ward Henderson, Tampa, FL
20	Defense	MedMal		12/4/23	Starr	Kurian	Travase Erickson	Saalfeld Shad, Jacksonville
21	Defense	MedMal	12/20/23		Mojica	Borelli	Matthew Alford	WILLIS MCKENZIE, La Grange, Ga
22	Defense	MedMal		2/16/24	Bellissimo	TriPoint	Dirk Riemenschneider	Buckingham Law Firm, Akron, OH
23	Defense	MedMal	5/2/24		Yarbrough	Friedland	Elizabeth Stein	Weathingon, Atlanta, GA
24	Defense	MedMal	7/19/24		McDonnough	Thrive	Krysta Grimes/Beth Boone	Hall Booth Smith, Brunswick, GA
25	Defense	MedMal	8/29/24		Motta	Campbell	Allison Wildman	Thompson, Miller, & Simpson, PLC, Louisville, KY
26	Defense	MedMal	4/1/25		Beloma	Fornace	Bethany Wharrie	MMPO Defense
27	Defense	MedMal		4/10/25	Nicholson	Vevera	Henry E. Scrudder, Jr.	Scrudder, Bass, Quillian, Horlock, Lazarus & Adele LLP
28	Defense	MedMal	7/10/25		Fleming	Community Ambulance	Craig Brookes	Huff Powell Bailey, Atlanta