

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
LUIGI NAPOLITANO,

Plaintiff

against

ROBERT L. WIGHTON, M.D., SULMAN MAHMOOD,  
D.O., JOSEPH DEMONTE, PCA, MADELINE FILS-ALME,  
R.N., CAROL CURRY, R.N., KARYN CARLSON, R.N. and  
NORTH SHORE UNIVERSITY HOSPITAL - NORTHWELL  
HEALTH

Defendants  
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SECOND  
SUPPLEMENTAL  
VERIFIED BILL OF  
PARTICULARS

Index No.: 700321/2022

Plaintiff(s), by his attorneys, HARRIS, KEENAN & GOLDFARB PLLC, as and for a  
Second Supplemental Bill of Particulars, allege(s), upon information and belief:

1. Plaintiff sustained the following special damages:

- A. Lost wages.....approximately \$77,400.00 from date of incident to  
the present and continuing
- B. Medical expenses and/or  
Medical liens.....approximately \$200,000.00 and continuing

Dated: New York, New York  
February 28, 2023

Yours, etc.

Marla Stein

Marla Stein  
HARRIS, KEENAN & GOLDFARB PLLC  
Attorney for Plaintiff(s)  
Luigi Napolitano  
233 Broadway, Suite 900  
New York, New York 10279  
Our File No. 207081

TO:

Wagner, Doman, Leto, & Di Leo, PC  
Attorney for Defendant(s)  
Robert L. Wighton, M.D., Sulman Mahmood, D.O.,  
Joseph Demonte, PCA, Madeline Fils-Alme, R.N.,  
Carol Curry, R.N., Karyn Carlson, R.N. and  
North Shore Community Hospital - Northwell Health  
227 Mineola Blvd  
Mineola, NY 11501  
(516) 742-1444

**ATTORNEY'S VERIFICATION**

**Marla Stein**, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury:

I am a partner of HARRIS, KEENAN & GOLDFARB PLLC, attorneys of record for Plaintiff in the action within. I have read the annexed **SECOND SUPPLEMENTAL BILL OF PARTICULARS** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff(s) is/are not presently in the county wherein I maintain my offices.

DATED: New York, New York  
February 28, 2022

Marla Stein  
Marla Stein