

Lora Hood, RN, BSN, CLNC

June 8, 2026

C. Smith
Attorney at Law
123 Main Street
Denver, CO 80416

Dear Mr. Smith,

I have reviewed the matter involving the death of Joshua Jacobs, a six-month-old infant who was hospitalized for suspected Rocky Mountain Spotted Fever (RMSF). Based on the information reviewed, it is my opinion that this case appears meritorious due to multiple deviations from the applicable standard of care. The principal concerns are summarized below.

Preliminary Standard-of-Care Concerns

- **Dr. Young and Dr. Robe**
 - Failed to reach a definitive diagnosis in a timely manner;
 - Failed to initiate appropriate treatment in a timely manner;
 - Failed to respond promptly to Joshua's deterioration and change in condition;
 - Failed to document daily assessments and progress notes during hospitalization, despite billing for daily visits.
- **Nurse Holly P.**
 - Failed to notify providers of abnormal laboratory values and worsening fever.
 - Failed to complete ordered labs and diagnostic studies.
- **Nurse Jessica N.**
 - Failed to notify providers or activate a critical or rapid response team regarding Joshua's deterioration and change in condition;
 - Failed to complete ordered interventions.
- **Nurse Nick S.**
 - Failed to complete ordered interventions in a timely manner, or at all.

Potential Plaintiff Case Weaknesses

- RMSF may be difficult to diagnose definitively in its early stages;
- The defense may argue comparative negligence related to Joshua's repeated tick exposure over approximately three days;
- The defense may assert delay in tick removal by Ms. Jacobs;
- The defense may argue that household pets were not adequately treated for fleas and ticks.

Recommended Next Steps

I recommend retaining qualified expert witnesses to further evaluate liability, causation, damages, and institutional practices. Appropriate experts may include a pediatrician, a pediatric infectious disease specialist familiar with RMSF, a pediatric nurse, a hospital administrator, and/or a chief nursing officer.

I also recommend obtaining and reviewing the complete medical records from the pediatric office, Charitable Sisters of Mercy Hospital, and Mission Hospital. In addition, the relevant hospital policies and procedures should be requested, including policies addressing provider notification, rapid response activation, documentation requirements, order execution, laboratory result reporting, and staffing.

Thank you for the opportunity to consult on this matter. Please let me know if you would like any additional analysis or a more detailed chronology of the medical events.

Sincerely,

Lora Hood, RN, BSN, CLNC