

## STATEMENT OF FACTS

### I. Background

1. Anthony Corleone, a 65-year-old retired businessman, lived with his family in Savoca, the capital city and a union territory in the country of Seragio. He has a history of cardiac issues, having suffered a heart attack in 2010 at the age of 50. He responded well to treatment at the time and remained stable for several years, managed on standard cardiac medication. Over the following decade, however, Anthony began to experience episodes of dizziness, fatigue, and near-fainting, though no clear structural abnormalities were identified. His condition was initially attributed to aging and general cardiac fatigue.
2. In March, 2024, Anthony experienced another heart attack and was rushed to a hospital in Savoca. While the medical team managed to stabilize him, he had to be placed on cardiac support. Despite their efforts, the doctors struggled to identify the underlying cause of the recurrence.
3. Even after consulting some of the most reputed hospitals across Seragio, his condition remained a mystery. Traditional treatments proved ineffective, and the heart did not respond to traditional pacemakers and other conventional cardiac interventions for long. The inability to reach a definitive diagnosis left his family deeply anxious and desperate for answers.
4. With local doctors unable to diagnose his condition, Anthony's family decided to take him to the United States of Maga ("**Maga**"), a developed nation known for its advanced medical care and cutting-edge cardiac facilities. In April 2024, Anthony accompanied by his daughter, Isabella, travelled to Maga in an Air Ambulance. On arrival, he was admitted to a renowned heart specialty hospital, Ellen Meller Heart Institute ("**Hospital**") in the capital of Maga, Maga City. The Hospital was internationally acclaimed for its expertise in complex cardiac conditions, and within days of admission, a multidisciplinary team began a thorough evaluation of Anthony's case.

5. After an exhaustive series of advanced tests and evaluations, Anthony was diagnosed with an exceptionally rare cardiac disorder - Neuro-Sino Cardiac Interface Failure ("NSCIF"). NSCIF was a rare cardiac condition in which the sinoatrial node (the heart's natural pacemaker) becomes biologically unable to maintain rhythm on its own due to a disruption in its neuro-electrical communication. Medical findings indicated that Anthony's heart's intrinsic electrical pathways had progressively deteriorated, making continuous, externally regulated modulation essential to maintaining cardiac stability.
6. To manage NSCIF, the treating doctor of Anthony, Dr. Helly Meller, recommended the implantation of a next-generation smart neuro-pacemaker, commercially known as the *AtriaLink System*. AtriaLink System was an AI-powered device which relied upon adaptive pacing instructions transmitted via a proprietary mobile application called *PulseLink*, installed on a mobile transmitter ("**Transmitter**"). The application ran a sophisticated AI algorithm trained on the patient's unique cardiac response patterns, enabling real-time, personalized modulation of the heart's rhythm.
7. Dr. Meller informed Anthony and Isabella that AtriaLink System was the only viable option for Anthony to continue a normal life as NSCIF patients did not respond to conventional pacemakers, cardiovascular implanted electronic devices or medicines. She further explained that without synthetic support, Anthony's condition could become fatal, or at best, leave him permanently bedridden and dependent on constant medical supervision.
8. Left with no other remedy, Anthony consented to the implantation of the AtriaLink System. The medical team at the Hospital under the supervision of Dr. Meller, successfully implanted the AtriaLink System. Following the implantation, the PulseLink mobile application was configured on the Transmitter. A personalized AI algorithm was then developed, calibrated specifically to Anthony's unique cardiac response patterns, enabling real-time modulation of his heart's rhythm with precision and adaptability. Anthony was also given an extra Transmitter in the event the original stopped working.

9. Anthony was thereafter kept under close medical supervision at the hospital for a period of one week prior to his discharge. During this time, both Anthony and Isabella, were provided with comprehensive orientation and hands-on training regarding the use, maintenance, and importance of the AtriaLink System, PulseLink mobile application and the Transmitter. The medical team, under the supervision of Dr. Meller, demonstrated the procedure for configuring the backup Transmitter and ensured that both Anthony and Isabella were familiar with all operating protocols. Dr. Meller and her team clearly and repeatedly informed them that the Transmitter must remain powered on, fully functional, and within operational range of Anthony's body at all times. The Transmitter was responsible for relaying AI-generated, real-time pacing signals to the implanted pacemaker without which the pacemaker would cease to function. The absence of signals transmitted through the pacemaker for longer than 60 mins posed a direct and life-threatening risk, potentially resulting in sudden and fatal cardiac arrest.
10. Before discharge, Dr. Meller handed over a comprehensive Patient Handbook detailing the safe use, handling, and precautions associated with the AtriaLink System.

## **II. The Incident**

11. Following his return from Maga, Anthony resumed his daily routine and continued to lead a normal life.
12. On 15 January 2025, Anthony and Isabella had gone out for shopping at the VLS Avenue Mall. While walking out of the mall, Anthony accidentally tripped on the stairs and fell. The Transmitter slipped out of his pocket and hit the ground with force, resulting in the screen being severely cracked and unresponsive.
13. Isabella and Anthony immediately considered rushing home to retrieve the backup transmitter; however, Isabella saw that the estimated travel time was approximately 1.5 hours due to traffic conditions. Concerned that the damaged screen could affect the functioning of the transmitter or shut it down, Anthony and Isabella proceeded to a

well-known and longstanding mobile and electronic device repair store in Savoca – Planet Electronics, which was close to the mall. There, they met a technician named Lucio (“**Accused**”).

14. Simultaneously, Isabella called her brother, Michael Corleone, who was at home, and instructed him to immediately bring the backup mobile transmitter to the repair store.
15. Isabella showed the mobile transmitter to the Accused and told him that the screen of the Transmitter was cracked and the display was not working. She asked the Accused if he could repair the device without shutting it down for too long and without damaging the device.
16. Before beginning, the Accused asked Isabella about the nature of the device. Isabella explained that the device was not an ordinary smartphone but a medically approved mobile transmitter which was linked to a pacemaker implanted in her father’s heart. She repeatedly told the Accused that the transmitter was required to remain continuously operational, as it communicated real-time AI-generated signals essential for the functioning of the pacemaker. Any malfunction or prolonged disconnection could lead to cardiac failure or even sudden cardiac arrest. She asked the Accused if he could repair the device without shutting it down for too long, no longer than 30-40 mins.
17. The Accused listened attentively to Isabella’s explanation. Thereafter, he took time to examine the device. To aid the Accused, Isabella showed him the Patient Handbook of the Atrialink System provided by the Hospital, on her phone.
18. Shortly thereafter, Michael called back and informed Isabella that he would take more than an hour to reach the service centre due to traffic congestion. Isabella conveyed this to the Accused and, in light of the urgency, requested the Accused if he could repair the screen safely in the meantime.
19. After examining the device again and reading the handbook, the Accused told Anthony and Isabella that the issue appeared limited to the display and he could

repair the screen without interfering with the internal parts of the Transmitter. The Accused told Isabella that the device would be shut for no longer than 30 mins as this was just basic display repair work. Relying on the Accused's demeanour and assurances, Isabella agreed for repairing the Transmitter. She requested that the Accused handle the repair with extreme care, ensuring that no damage or disruption was caused to the transmitter.

20. The Accused then proceeded to work on the device. Before beginning the repair, the Accused attempted to look up the device on his laptop. However, given the proprietary nature of the device, he could not find any specific internal layout diagrams or service warnings online. The Accused, thereafter, gently and carefully pried open the casing, intending only to access the screen assembly and avoiding any contact with the motherboard or processor.
21. During the repair, the Accused observed that the display connector appeared dislodged at the edge of the circuit board. To restore the display function, the Accused tried to reconnect the cable. In doing so, however, a short circuit occurred. The Accused appeared visibly shaken and immediately tried to reboot the device, switching to recovery tools. His colleague, Mario Denver, who was present at the service centre helped the Accused to switch on the device. However, despite multiple attempts, they were unable to revive the transmitter.
22. Soon thereafter, Anthony began to experience acute symptoms of cardiac distress – sweating profusely, sharp pain in the chest, clutching his chest. Isabella grabbed the Transmitter and rushed Antony to the nearest hospital.
23. Upon arrival at the emergency room, the emergency responders confirmed that Anthony was in cardiac arrest. They promptly initiated Cardiopulmonary Resuscitation, deployed an automated external defibrillator to attempt revival and administered emergency intravenous medications. After exhausting all resuscitative measures over an extended period, the medical team declared Anthony deceased at the scene.

### III. The Proceedings

24. A first information report being FIR No. 212 of 2025 (“FIR”) was registered against Lucio on the complaint of Isabella. In her complaint to the police, Isabella detailed the events leading up to the alleged malfunction of the Transmitter and raised serious concerns regarding the Accused’s handling of the device, which she believed directly contributed to her father’s cardiac arrest and demise.
25. The FIR culminated into a Final Report against the Accused under Section 105 of the Seragio Penal Code, 2021. The Accused was formally charged and he pleaded not guilty. Thereafter, the trial commenced before the Savoca Sessions Court. After recording of evidence, the case is now listed for hearing before the Savoca Sessions Court.

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**NOTES FOR COUNSEL**

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1. Anthony Corleone has been diagnosed with a rare and uniquely occurring medical condition, Neuro-Sino Cardiac Interface Failure, that bears no resemblance or reference to any previously documented disease or disorder.
2. The AtriaLink System and PulseLink are proprietary, patented innovations that do not resemble or reference any prior pacemaker or medical device on record.
3. Counsels for the Prosecution will argue on behalf of the State of Savoca.
4. Counsels for the Defence will argue on behalf of the accused person, Lucio.
5. Seragio is a constitutional republic following the common law system. It follows trial by judge and not jury.
6. The laws in Seragio are *pari materia* with Indian laws. However, law from all common law jurisdictions including but not limited to India are persuasive.

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**Section 105 of the Seragio Penal Code, 2021**

Punishment for culpable homicide not amounting to murder.

105. Whoever commits culpable homicide not amounting to murder, shall be punished with imprisonment for life, or imprisonment of either description for a term which shall not be less than five years but which may extend to ten years, and shall also be liable to fine, if the act by which the death is caused is done with the intention of causing death, or of causing such bodily injury as is likely to cause death; or with imprisonment of either description for a term which may extend to ten years and with fine, if the act is done with the knowledge that it is likely to cause death, but without any intention to cause death, or to cause such bodily injury as is likely to cause death.

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**EXHIBITS AND STATEMENTS**

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<b>S. No.</b>	<b>Evidence</b>
1.	Exhibit – 1 – Patient Handbook published by MedTech LLC and issued by the Ellen Meller Heart Institute to the deceased, Anthony Corleone
2.	Statement of PW-1, Isabella Corleone, informant and daughter of deceased
3.	Statement of DW-1, Mario, employee at Planet Electronics and colleague of accused

WORLD'S FIRST AND ONLY AI-  
POWERED SMART-NEURO  
PACEMAKER

# ATRIALINK SYSTEM™

## PATIENT HANDBOOK

Caution: For use under physician supervision only. Federal Law (USM) restricts this device to sale by or on the order of a physician.



## INFORMATION ABOUT YOU AND YOUR DEVICE

- ▶ Your name: Anthony Corleone
- ▶ Your Doctor's name: Dr. Helly Meller
- ▶ Date of Implant: 15 April 2024
- ▶ Hospital where implanted: Ellen Meller Heart Institute, Maga City
- ▶ Model: Atrialink ALX-5000
- ▶ Model Series: Atrialink ALX-5000 15

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# INTRODUCTION

- ▶ Welcome to the AtrialLink System™ — an advanced AI-powered smart neuro-pacemaker designed for patients with Neuro-Sino Cardiac Interface Failure. This system combines implantable pacing technology with real-time adaptive algorithms to deliver personalized cardiac regulation.

# PRODUCT OVERVIEW

The Atrialink System includes:

- ▶ A **neuro-responsive implantable pacemaker device**
- ▶ A **mobile app interface (PulseLink™)** for real-time monitoring and adjustments
- ▶ **Hospital cloud dashboard** for physician oversight and emergency intervention

**Key Features:**

- ▶ Adaptive pacing algorithms
- ▶ Bluetooth Low Energy connectivity
- ▶ Encrypted data transmission
- ▶ Real-time ECG monitoring and alerts
- ▶ Battery life of 10-12 years

# WARNING SIGNS



**⚠ WARNING: DO NOT OPEN OR INTERFERE WITH INTERNAL COMPONENTS. DEVICE INTEGRITY IS ESSENTIAL TO CARDIAC LIFE SUPPORT.**



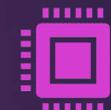
**Immediate medical attention** is required if the patient experiences repeated fainting, severe dizziness, irregular heartbeats, or prolonged fatigue.



**PulseLink** mobile transmitter must remain **powered on, sufficiently charged, and within operational Bluetooth range** (typically 2–5 meters) of the patient to ensure seamless communication and real-time AI-guided pacing adjustments.



**Loss of vibration alerts** or notifications on PulseLink may indicate disrupted system connectivity—restore connection or contact your physician promptly.



**Prolonged disconnection or shutdown** of the PulseLink app can **interrupt adaptive feedback loops** and **may lead to critical device malfunction or pacing failure.**

## CONTACT & SUPPORT

- ▶ **Atrialink Customer Care (24/7)**
  - ☎ Toll-Free: 1800-780-500
  - ✉ support@atrialinkhealth.maga
  - 🌐 www.atrialink.maga
- ▶ **In case of emergency, contact your primary cardiologist or visit the nearest Medtech LLC certified hospital or service centre.**

### **About MedTech:**

At MedTech, we're committed to helping people live their best life through the power of technology. For more than 50 years, we've brought new products and technologies to the world – in diagnostics and medical devices. Our technology continues to create endless possibilities for people at all stages of life.

Connect with us at [www.medtech.com](http://www.medtech.com) or contact us at 752-756-7654



**IN THE COURT OF SESSIONS JUDGE, SAVOCA**  
**SESSIONS TRIAL CASE NO. 173 OF 2025**  
**STATE OF SAVOCA V. LUCIO**  
**STATEMENT OF PW-1**

**Deposition of witness No. 1 for the prosecution, daughter of deceased, aged about 43 years taken on solemn affirmation on the 17th day of May 2025.**

**Examination in Chief**

1. I am Isabella Corleone, daughter of deceased and the informant. My father, Anthony Corleone, my brother Michael Corleone and I lived together in Savoca.
2. My father had been a heart patient for years. He suffered his first heart attack back in 2010, when he was about 50 years old. Until March, 2024, he was completely stable and led a normal life. He was always on heart medications but there were no major health concerns or incidents until then. However, in March, 2024, he suffered a heart attack once again. Michael and I rushed him to the hospital where the medical team was able to stabilise him, but only by placing him on life support. It was an extremely distressing time for our family.
3. Over the next few weeks, my father underwent several rounds of medical evaluations at various hospitals across Seragio. Unfortunately, no doctor could reach a definitive diagnosis. His heart failed to respond to traditional pacemakers and other conventional cardiac interventions. Each failed attempt left us more desperate and anxious.
4. After extensive research, we came across the Ellen Meller Heart Institute in Maga City, a hospital internationally recognised for its expertise in complex cardiac conditions. We immediately reached out to the hospital. After reviewing my father's case history, the doctors there strongly recommended that he be airlifted to Maga for urgent evaluation and treatment.
5. In the first week of April 2024, I accompanied my father in an air ambulance to Maga City. Immediately on arrival, my father was admitted at the Hospital. Within days, a multidisciplinary team led by Dr. Helly Meller began an extensive evaluation and diagnostic process to determine the underlying cause of his condition.
6. After several rounds of advanced diagnostic tests, my father was diagnosed with an extremely rare cardiac disorder known as Neuro-Sino Cardiac Interface Failure. Dr. Meller explained to us that this condition affects the heart's natural pacemaker, the sinoatrial node rendering it biologically incapable of maintaining rhythm on its own due to a disruption in the neuro-electrical communication pathways that regulate

cardiac function. She further informed us that my father's test results indicated a progressive and severe deterioration of these intrinsic pathways. As a result, his heart had become entirely dependent on external modulation, even for performing basic cardiac functions.

7. Since my father's condition was life-threatening, Dr. Meller strongly recommended the implantation of the AtriaLink System, an AI-powered neuro-pacemaker. The AtriaLink System functions through a mobile transmitter running a proprietary application called PulseLink, which used an AI algorithm trained on the patient's individual cardiac response patterns. This allowed for real-time, personalised modulation of the heart's rhythm, adjusting dynamically to the body's needs.
8. Dr. Meller clearly informed us that the AtriaLink System was the only viable treatment option available. She explained that without this intervention, my father's heart would not be able to sustain rhythm on its own, and he would either be permanently bedridden and dependent on constant medical supervision, or his condition could become rapidly fatal.
9. Left with no other remedy, we consented to the implantation of the AtriaLink System. My father underwent successful implantation of the system and was discharged after one week of training and orientation. Dr. Meller and her team informed us that the transmitter must remain powered on and operational at all times, it must be within range of the implanted pacemaker and any shutdown for over 60 minutes could be fatal, due to sudden cardiac arrest.
10. Dr. Meller also handed us a Patient Handbook for use and handling of the AtriaLink System. We were also given a backup transmitter in case of damage or failure of the primary one.
11. Thereafter, my father was stable and led a normal healthy day until the unfortunate day.
12. On 15 January 2025, I accompanied my father to the VLS Avenue Mall for shopping. While descending the stairs outside the mall, he accidentally tripped, and the transmitter slipped from his pocket, hitting the ground. The screen was severely cracked and unresponsive.
13. I immediately checked the device and realised the screen was not functioning. My father and I considered returning home for the backup transmitter, but due to heavy traffic, the estimated travel time was over 1.5 hours. Given the urgency and medical risk, we decided to go to a nearby electronic repair shop: Planet Electronics, which was well-known in Savoca. At the same time, I also called my brother, Michael and asked him to immediately rush to the service centre with the backup Transmitter.

14. At Planet Electronics, we met the Accused, who is a technician at the service centre. I clearly informed him that the transmitter was not a regular phone but a life supporting medical device, that it was linked to my father's pacemaker and any prolonged shutdown or internal damage could cause cardiac arrest. I told him this multiple times.
15. I repeatedly requested the Accused to repair the screen only if it could be done safely, and without interference with any internal components. I checked with him if he could repair the device without shutting it down for not more than 30-40 mins. I told him that we were worried that the device may shut down and they may not be able to reach home prior to that to get the backup transmitter.
16. I told that any malfunction or prolonged shut down of the device could lead to cardiac failure or even sudden cardiac arrest. Lucio appeared to understand the seriousness of the situation. To aid him further, I even showed him the Patient Handbook on my phone, which contained explicit warnings not to open or interfere with internal components. The Patient Handbook also clearly stated that prolonged disconnection from PulseLink could lead to device malfunction.
17. Around that time, my brother Michael informed me that he would take more than an hour to reach the shop with the backup device. Faced with this delay, I asked Lucio if he could safely perform a display repair while we waited.
18. After examining the device, Lucio told us that the damage appeared limited to the display, and that the device would not be shut down for more than 30 minutes. Relying on his assurance, I consented to the repair, reiterating that he must avoid touching any signal-related component.
19. Before beginning the repair, the Accused attempted to look up the device on his laptop. However, given the proprietary nature of the device, he could not find any specific internal layout diagrams or service warnings online. The Accused then proceeded to repair the device. Thereafter, he opened the transmitter casing and within minutes of doing so, there was a short circuit. Lucio appeared shocked and began trying to reboot the device, along with his colleague, Mario Denver. Despite their attempts, the transmitter remained unresponsive.
20. Within minutes, my father began sweating profusely and clutching his chest. I grabbed the device and rushed him to the nearest hospital.
21. At the emergency department, the doctors confirmed that my father was in cardiac arrest. Resuscitation efforts, including CPR and defibrillation, were unsuccessful and my father was declared dead at the scene.

22. Deeply devastated and grieving, I lodged a formal complaint against Lucio at the Savoca Police Station. My father's death is a direct result of Lucio's interference with the transmitter, despite repeated warnings and express instructions.

**Cross examination**

23. It is correct that the doctors had told us that the transmitter should remain operational at all times. It is correct that the screen was not working, and I was afraid it might shut down.
24. It is correct that I called my brother Michael and asked him to bring the back-up transmitter. It is correct that that my brother had said traffic was heavy and it would take over an hour. It is correct that I was worried that travelling to home for 1.5 hours or waiting passively for the back-up device may pose a serious threat to my father's life.
25. It is correct that due to the delay in reaching home, I asked Lucio to try to fix the screen in the meantime. It is correct that that I requested Lucio to repair the device as I was worried that the device might stop working before the backup arrived or before we reach home. It is correct that we consented to get the device repaired to prevent risk of the device shutting down.
26. Lucio used small precision tools, wore rubber-tipped gloves, and had a magnifying lens. He seemed to be very cautious. The screen didn't turn on, and after a moment the device seemed to power off. There was a sound like a click, and Lucio looked startled. Lucio looked shocked after the short circuit and immediately started trying to reboot it.
27. Yes, I understand that electronics can be unpredictable sometimes, even when you're careful. I do not have a technical knowledge of electronics.

Read Over and Accepted as Correct, the witness had affixed his signatures.

Sd/-

Isabella Corleone

Certified that under my instructions and in my presence the statement of witness has been recorded. Statement has been read over to the witness who admitted to be correctly recorded.

Sd/-

17.05.2025

Sessions Judge,

Savoca

**IN THE COURT OF SESSIONS JUDGE, SAVOCA**  
**SESSIONS TRIAL CASE NO. 173 OF 2025**  
**STATE OF SAVOCA V. LUCIO**  
**STATEMENT OF DW-1**

**Deposition of witness No. 1 for the accused, son of Mr. Gabriel Denver, aged about 35 years taken on solemn affirmation on the 19th day of May 2025.**

**Examination in Chief**

1. My name is Mario Denver. I am currently employed as a senior service technician at Planet Electronics, Savoca. I have been in the field of electronics servicing and repair for over 10 years.
2. I joined Planet Electronics in 2021 and since then I have worked alongside Lucio for the past 4 years now. Lucio has been employed at Planet Electronics since 2015.
3. Lucio has been working as an electronics servicing and repair technician for over 15 years. In my experience of working with him, I can say that he has considerable technical expertise and hands-on skill in repairing a wide range of electronic devices. More importantly, Lucio has always demonstrated precision, and caution in his work. He is well regarded by clients for his responsible approach to handling sensitive electronic devices. Lucio and I have previously handled several advanced devices including health-monitoring wearables, medical-grade ECG patch modules, and Bluetooth-enabled vitals trackers.
4. On the afternoon of 15 January 2025, I was present at the Planet Electronics service counter when Isabella and Anthony entered the shop and approached Lucio. Both appeared visibly distressed. Isabella presented what looked like a smartphone and informed Lucio that the device's display had been damaged and needed repair.
5. When Lucio asked Isabella about the device, she told him that the device was a medical transmitter linked to a pacemaker implanted in her father's heart. She further told him that the Transmitter was vital for the pacemaker to remain functional. She told Lucio that if the Transmitter stopped working, the pacemaker implanted in her father's heart would also stop working which may lead to cardiac arrest. Both Isabella and Anthony were visibly panicked and requested Lucio if he could repair the device without shutting it down for too long.
6. Isabella also showed Lucio some document on her phone, which I saw Lucio read from her phone. Lucio later told me that Isabella showed her a handbook given by the hospital where the pacemaker was implanted.

7. Lucio thereafter told Isabella that he would only proceed only if the damage was limited to the display and would avoid not do any repair work which required interfering with any internal component linked to core functionality.
8. During this time, Isabella received a call from someone. After ending the call, she informed Lucio that the backup device would take some time to arrive. She appeared anxious and once again requested Lucio if he could proceed with repairing the screen without the device shutting off for too long.
9. Lucio did not rush to begin repair. In fact, he continued inspecting the device and assessing the risk thoroughly before making any move. After examining the device again, Lucio told Anthony and Isabella that the issue appeared to be only with the display and he could repair the screen without shutting down the device for long. Isabella agreed for the device to be repaired.
10. Lucio took all precautions for repairing the Transmitter. Out of caution, Lucio wore anti-static gloves, used a magnifying lens, and non-invasive tools. He placed the device on grounded surface and cleaned the surface prior to keeping the device on it. I also saw him using his laptop prior to starting repair.
11. Lucio proceeded to repair the device with extreme care. At no point did he rush or act hastily. I was beside him when he noticed the display connector was dislodged and said, *"This could be why the screen isn't coming on. I think it's safe to reconnect this, otherwise the transmitter might go dead entirely."* He then tried to reseat the display connector using rubber-tipped tweezers, which is when we saw something of a short circuit. After the short circuit, Lucio tried to reboot the device, however, the device would not power on. Lucio was visibly shocked and concerned. He repeatedly said *"I didn't expect that— everything looked normal. I followed all precautions. I thought if I didn't reconnect the display, it could damage the device before the backup reaches."* Lucio immediately began troubleshooting and asked me to assist. We tried soft reboots, external power reset, and alternate boot procedures. Despite our best efforts, we could not revive the transmitter.
12. Isabella immediately thereafter took the device from Lucio and rushed out of the store alongwith Anthony.

### **Cross Examination**

13. I am working as a Senior Technician at Planet Electronics. On the said date, I was attending to another repair job when Isabella and Anthony walked in. However, the visibly panicked demeanour with which Isabella and Anthony walked in the service centre caught my attention and I started listening to their conversation. My service

counter is right next to Lucio's. I was standing right next to him at the time when Isabella and Anthony walked in.

14. It is correct that Isabella said if the transmitter stopped working, the pacemaker would also stop, and that could lead to cardiac arrest. I did not see the contents of the handbook, nor was the screen of Isabella's phone visible to me. My knowledge is limited to what Lucio told me afterward. I could see Lucio taking time to read the handbook, but I cannot say with certainty whether he read it in its entirety or whether he understood it completely.
15. I believe by core components he meant the parts of the device that controlled communication with the pacemaker — like the processor or signal system. No, Lucio did not define core components exactly, but he said he'd avoid anything beyond the screen area. No, Lucio didn't have access to any schematic or layout of the Transmitter.
16. It is correct that in my experience, the circuit would be a core component. Lucio identified the issue as being related to the display. From what I observed, he inspected the device for external signs of damage and examined the casing. He noted that the screen was cracked, but the casing did not appear to be dented or tampered with.
17. There is always a chance of damage to device while repairing any part of the device. However, it is not that common especially when repairing display. The display was on the front panel. The connector was along the edge of the board, near other components. I couldn't identify every part, but Lucio was being careful to only access the top section where the cable was seated.
18. Yes, I have considerable experience in servicing and repairing of devices. Yes, it is possible to access and reconnect display without touching or affecting nearby circuits.
19. I cannot say if it is possible to access and reconnect display without touching or affecting nearby circuits for the Transmitter.
20. Lucio later told me that he relied on his experience handling similar electronic devices and his visual inspection of how the parts were connected to come to a conclusion that it was a display issue which could be fixed by reseating the display connected.

Read Over and Accepted as Correct, the witness had affixed his signatures.

Sd/-

Mario Denver

Certified that under my instructions and in my presence the statement of witness has been recorded. Statement has been read over to the witness who admitted to be correctly recorded.

Sd/-

19.05.2025

Sessions Judge,

Savoca