

SCANNED  
Date: 4/2/09  
Initials: [Signature]

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT IN AND FOR  
MIAMI-DADE COUNTY, FLORIDA

KHASAN GRACE, individually and as  
parent and natural guardian of ANDREW  
MASON GRACE, a minor,

Plaintiff,

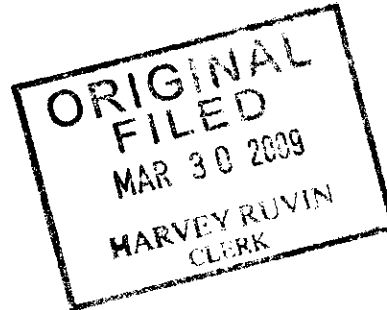
CIVIL DIVISION

CASE NO: 09-25541CA02

v.

HOMESTEAD HOSPITAL, INC. d/b/a  
HOMESTEAD HOSPITAL, a Florida  
corporation; MARK H. WEINSTEIN, M.D.;  
JAMES A. FISH, D.O.;  
HOMESTEADMED, P.A., a Florida  
corporation; JOSEPH N. NICAISSÉ, M.D.;  
JOSEPH N. NICAISSÉ, M.D., P.A., a  
Florida corporation; HOMESTEAD  
MEDICAL CLINIC, P.A., a Florida  
corporation; ROBERT S. ELIAS, M.D.;  
ELIAS RADIOLOGY ASSOCIATES, P.A.,  
a Florida corporation; HOMESTEAD  
DIAGNOSTIC CENTER, INC., a Florida  
corporation.

Defendants.



**PLAINTIFFS' FIRST REQUEST TO PRODUCE TO DEFENDANT**  
**HOMESTEAD MEDICAL CLINIC, P.A.**

The Plaintiff, KHASAN GRACE, individually and as parent and natural guardian of ANDREW MASON GRACE, a minor, by and through undersigned attorney, pursuant to the Florida Rules of Civil Procedure, request the Defendant, HOMESTEAD MEDICAL CLINIC,

P.A. to produce for inspection and/or copying at the offices of Plaintiffs' counsel within forty-five (45) days from the date of service of this request, the following:

1. Copies of all insurance policies insuring Homestead Medical Clinic, P.A. for the risk sued upon herein.

2. If Homestead Medical Clinic, P.A. is not insured for acts of negligence and for the damages described in the complaint, please provide all documents evidencing compliance with §§458.320(1) and (2), Fla. Stat. (2008).

3. A clear and legible color copy of Homestead Medical Clinic, P.A.'s office chart on Khasan Grace, and every other paper, document and other material pertaining to Khasan Grace in the possession of or within the custody and control Homestead Medical Clinic, P.A. This request includes but is not limited to all tangible medical records and other materials pertaining or relating in any way to the care rendered to Khasan Grace by Homestead Medical Clinic, P.A. This request includes all x-rays, radiographic images, echocardiograms, microscopic slides, EKGs, and other diagnostic tests performed on Khasan Grace while a patient of Homestead Medical Clinic, P.A.

4. All bills, invoices, insurance forms, government documents and any other tangible items in the possession of Homestead Medical Clinic, P.A., which pertain to Homestead Medical Clinic, P.A.'s care of Khasan Grace. This request is intended to include, but is not limited to, all data and records relating to bills, statements and medical charges rendered or submitted to any source arising out of Homestead Medical Clinic, P.A.'s care of Khasan Grace.

5. All tangible documents, records or any other items pertaining to Homestead Medical Clinic, P.A.'s care of Khasan Grace, other than those items provided in response to requests numbered (2) and (3), above.

6. Copies of the Complaints in all medical negligence lawsuits in which Homestead Medical Clinic, P.A. has been named as a Defendant.

7. Copies of all indemnity agreements or joint defense agreements between Homestead Medical Clinic, P.A. and any other individual or entity.

8. All contracts and/or written agreements between Homestead Medical Clinic, P.A. and any P.A.'s, Employees, and/or Corporations.

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing Request to Produce has been attached to the summons and complaint to be served upon the Defendant, Homestead Medical Clinic, P.A. contemporaneously with the Summons and Complaint herein.

DATED this 20<sup>th</sup> day of March, 2009.

RATZAN & RUBIO, P.A.  
Attorneys for Plaintiffs  
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By: 

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