

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,

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. NICAISSSE, M.D.;
JOSEPH N. NICAISSSE, 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.

CIVIL DIVISION

CASE NO: 09-255-1100-1

ORIGINAL
FILED
MAR 30 2009
HARVEY RUVIN
CLERK

PLAINTIFFS' FIRST REQUEST TO PRODUCE TO DEFENDANT
HOMESTEADMED, 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, HOMESTEADMED, 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 HomesteadMed, P.A. for the risk sued upon herein.
2. If HomesteadMed, 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 HomesteadMed, 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 of HomesteadMed, 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 HomesteadMed, 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 HomesteadMed, P.A.
4. All bills, invoices, insurance forms, government documents and any other tangible items in the possession of HomesteadMed, P.A., which pertain to HomesteadMed, 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 HomesteadMed, P.A.'s care of Khasan Grace.
5. All tangible documents, records or any other items pertaining to HomesteadMed, 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 HomesteadMed, P.A. has been named as a Defendant.
7. Copies of all indemnity agreements or joint defense agreements between HomesteadMed, P.A. and any other individual or entity.
8. All contracts and/or written agreements between HomesteadMed, 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, HomesteadMed, P.A. contemporaneously with the Summons and Complaint herein.

DATED this 30th day of March, 2009.

RATZAN & RUBIO, P.A.
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By: 

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