

SCANNED
Date: 7/15/09
Initials: AMH

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,

CIVIL DIVISION

CASE NO: 09-25541CA02

Plaintiff(s),

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. NICAISSE, M.D.;
JOSEPH N. NICAISSE, 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.,

Defendant(s).
_____ /

THE ORIGINAL FILED
ON JUL 13 2009
IN THE OFFICE OF
CIRCUIT COURT DADE CO. FL

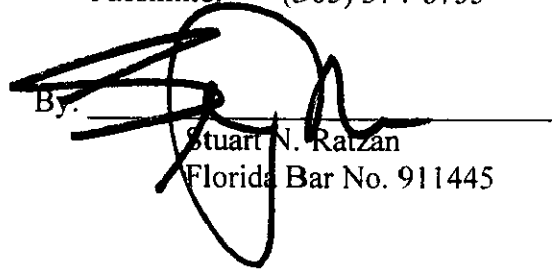
**PLAINTIFF'S NOTICE OF SERVICE OF EXPERT WITNESS
INTERROGATORIES TO DEFENDANTS,
JAMES A. FISH, D.O. AND HOMESTEADMED, P.A.**

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, hereby propounds the following Expert Witness Interrogatories to Defendants, JAMES A. FISH, D.O and HOMESTEADMED, P.A., to be answered under oath, in writing, in accordance with Rule 1.340, Florida Rules of Civil Procedure, within thirty (30) days from the date of service of said interrogatories.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing
Interrogatories have been mailed and sent via telefax and mail on this 10th day of July,
2009 to all counsel on the attached service list.

RATZAN & RUBIO, P.A.
Attorneys for Plaintiffs
Wachovia Financial Center
54th Floor
200 South Biscayne Boulevard
Miami, FL 33131
Telephone: (305) 374-6366
Facsimile: (305) 374-6755

By:  _____
Stuart N. Ratzan
Florida Bar No. 911445

SERVICE LIST

Gustavo Gutierrez, Esq.
Law Offices of Gustavo Gutierrez
Attorney For: Homestead Diagnostic Center
Grove Place
Suite 300
2964 Aviation Avenue
Coconut Grove, FL 33133
Phone: (305) 372-1313
Fax: (305) 529-9171

Michael Brand, Esq.
Cole, Scott & Kissane, P.A.
Attorney For: Robert S. Elias, M.D. and Elias Radiology
9150 South Dadeland Blvd.
Suite 1400
Miami, FL 33131
Phone: (305) 350-5300
Fax: (305) 373-2294

Jeffrey A. Jacobs, Esq.
Jeffrey A. Jacobs, P.A.
Attorney For: Homestead Medical Clinic-present owners
2333 Brickell Avenue
Suite A-1
Miami, FL 33129
Phone: (305) 443-3160
Fax: (305) 445-5990

Andrew S. Connell, Esq.
Marlow, Connell, Valerius, et al.
Attorney For: Mark Weinstein, M.D.
4000 Ponce De Leon Blvd.
Suite 570
Coral Gables, Fl 33146
Phone: (305) 446-0500
Fax: (305) 446-3667

Leslie McCormick, Esq.
Wicker Smith
Attorney For: Dr. James Fish/Homestead Med
Grove Plaza - 5th Floor
2900 SW 28th Terrace
Miami, Fl 33133
Phone: (305) 448-3939
Fax: (305) 441-1745

Barbara W. Sonneborn, Esq.
Sonneborn Rutter, Cooney & Klingensmith
Attorney For: Nicaisse
P.O. Box 024486
West Palm Beach, Fl 33402-4486
Phone: (561) 684-2000
Fax: (561) 684-2312

Scott Solomon, Esq.
Falk, Waas, Hernandez, Cortina, Solomon & Bonner
Attorney For: Homestead Hospital
Two Alhambra Plaza
Suite 750
Coral Gables, FL 33134
Phone: (305) 447-6500
Fax: (305) 447-1777

PLAINTIFFS' EXPERT WITNESS INTERROGATORIES TO DEFENDANTS,
JAMES A. FISH, D.O. AND HOMESTEADMED, P.A.

1. Please state the name and address of each person expected by you, your attorney, or any representative of yours, to testify as an expert witness during the trial of this matter.

2. Please state the following information for each expert witness listed in the preceding Interrogatory regarding his profession or occupation, and the field in which he is allegedly an expert; the name and address of each school he attended and a description of each degree received; the name of any professional or trade associations or which he is a member; the title, subject matter, publisher and date of publication of any books, papers or articles he has written or contributed to in his field; the number of years each has practiced or worked in his field; his place of employment for the past ten (10) years; the subject matter of which he is expected to testify.

3. Please state whether any of your experts listed in your answers above have determined any facts or formed any opinions concerning any issues involved in this case and if so, please state the name of the expert or experts, and the issue about which he has an opinion; the fact or facts determined and the opinion or opinions formed by each expert; The substance of the facts relied on by such experts in arriving at his opinion or opinions; and a summary of the grounds relied upon by each expert in reaching his opinion.

4. Did any expert listed above, submit a report setting forth his opinions or conclusions reached from any test, analysis, examination or inspection that he may have conducted? If so, please state the date his report was submitted and who submitted it; the name or other means of identification of the person to whom the report was submitted; the name and address of the person who has present custody of this report; and a summary of the contents of this report.

5. Have any experts listed above submitted any other reports in regard to any issues relevant to this lawsuit? If so, please state the name of such expert; a description of each report that was made; the date that each report was made; the name, or other means of identification of the person to whom each report was submitted; the name and address of the person who has present custody of each report; and a summary of the contents of each report.

6. Please state the name and address and the following information for each lay person expected to be called as a witness or testify at the trial of this matter; and state the name and last known address of such lay person; and a brief statement of the facts or substance of the testimony expected from said witness.

7. Please state whether the above-described expert witnesses have ever testified on behalf of the attorneys representing you herein and if so, please state the amounts of times, the dates, and the cases that said testimony was in.

8. Please describe in detail the scope of employment of the expert or experts and their rate of compensation for each such expert services.

9. Please state in detail each expert's general litigation experience including the percentage of work performed for Plaintiff's and Defendants.

10. Please identify all other cases over the past five (5) years in which the expert or experts have testified by deposition or at trial.

11. Please provide an approximation of the portion of the expert's or experts' involvement as an expert witness based on the number of hours, percentage or hours, and the percentage of earned income derived from serving as an expert witness.

Signature of Person Answering Interrogatories

STATE OF FLORIDA)
)
COUNTY OF _____)

BEFORE ME, the undersigned authority, personally appeared _____ who is (personally known to me) (or has produced a _____, numbered _____, as identification, which was issued on _____, has an expiration date of _____) and who, being first by me duly sworn, acknowledge that he/she is the person duly authorized to execute the foregoing Answers to Interrogatories, and that he/she has read the answers and that they are true and correct to the best of his/her knowledge and belief, and he/she executed the same in my presence, this _____ day of _____, 2009.

SWORN to and SUBSCRIBED before me this _____ day of _____, 2009.

Signature of Notary

Printed Name of Notary

Commission Expiration

_____ Personally known to me

_____ Produced I.D.

TRANSACTION REPORT

JUL-10-2009 FRI 06:15 PM

FOR: Ratzan & Rubio, P.A.

3053746755

FAX BROADCAST

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
JUL-10	04:41 PM	0352#1329#3055299171	5' 44"	8	FAX TX	OK	151	
		#						
	04:47 PM	0352#1329#3054463667	2' 00"	8	FAX TX	OK	151	
		#						
	04:50 PM	0352#1329#3054411745	2' 02"	8	FAX TX	OK	151	
		#						
	06:13 PM	0352#1329#1561684231	2' 01"	8	FAX TX	OK	151	
		2#						
	04:54 PM	0352#1329#3054471777	3' 54"	8	FAX TX	OK	151	
		#						

TOTAL : 15M 41S PAGES: 40

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,

CIVIL DIVISION

CASE NO: 09-25541CA02

Plaintiff(s),

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. NICAISSE, M.D.; JOSEPH N. NICAISSE, 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.,

Defendant(s).

PLAINTIFF'S NOTICE OF SERVICE OF EXPERT WITNESS INTERROGATORIES TO DEFENDANTS, JAMES A. FISH, D.O. AND 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, hereby propounds the following Expert Witness Interrogatories to Defendants, JAMES A. FISH, D.O and HOMESTEADMED, P.A., to be answered under oath, in writing, in accordance with Rule 1.340, Florida Rules of Civil Procedure, within thirty (30) days from the date of service of said interrogatories.