

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

TAMARA VANDERHYDEN,

Plaintiff,

against -

PLANNED PARENTHOOD OF NEW YORK
CITY, BETH ISRAEL MEDICAL CENTER,
GERALD ZUPNICK, M.D., MAUREEN PAUL,
M.D., ZOE RODRIGUEZ, M.D. and JACQUELINE
BROWN, M.D.,

Defendants.

The People of the State of New York

Index No.: 116033/07

**JUDICIAL SUBPOENA
DUCES TECUM**

*This Subpoena must be returned
with the records to Court.*

RECEIVED
JAN 5 2011
CLERK OF THE SUPREME COURT
COUNTY OF NEW YORK

012

TO: Jahanshah Seraji MD
130 Merrick Road
Lynbrook, New York 11563

GREETING:

WE COMMAND YOU, That all business and excuses be laid aside, you and each of you appear and attend before Honorable Alice Schlessinger, **SUPREME COURT, COUNTY OF NEW YORK, 60 Centre Street, New York, New York 10007, Subpoenaed Records Room**, on the 4th day of January, 2011, at 9:30 a.m., in the forenoon, and at any recessed or adjourned date to give testimony in this action of the part of the plaintiffs and that you bring with you, and produce at the time and place aforesaid, certain

A complete, **certified** copy of all medical records and/or medical chart of and pertaining to the care and treatment rendered to [REDACTED]

The records shall include but not be limited to the following:

- pathology slides and reports;
- any and all billing records;
- photographs;
- surgical or operative reports;
- any and all diagnostic testing including but not limited to x-rays, CAT scan films and MRI films and reports; and
- doctor notes, orders, nurses notes, correspondence, consultations and assessments, laboratory slips and/or reports, flow sheets, tapes, video tapes or anything whatsoever compromising and made part of the record of care and treatment rendered to Tamara