

## REQUESTS TO PRODUCE

1. All claims and investigation files prepared by Defendant's representatives in anticipation of the above-captioned lawsuit or trial thereof. (This Request does not include disclosure of the mental impression of defendant's attorneys or their conclusions, memoranda, notes or summaries, legal research or legal theories. With respect to the representatives of defendant other than their attorneys, this Request shall not include disclosure of their mental impressions, conclusions, or opinions respecting the value or merit of a claim or defense, or respecting strategy or tactics.)

2. Any and all statements concerning the action, from all witnesses including any statements from the parties herein, or their respective agents, servants or employees, including taped recordings, whether transcribed or not, and all written statements.

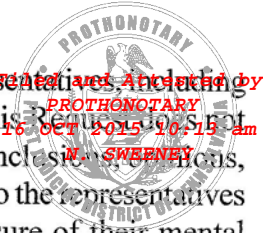
3. Any and all written contracts, agreements of employment, or indemnification agreements in existence in December 2014 between Answering Defendant and Co-Defendant Philadelphia Women's Center, Inc.

4. Any and all records, contracts, or other document establishing or otherwise referring to the relationship between you and Co-Defendant Philadelphia Women's Center, Inc. and/or document(s) relating to the privileges granted to you by Co-Defendant Philadelphia Women's Center, Inc.

5. Any and all diagnostic tests and reports relating to Plaintiff, including ultrasounds, x-ray films, CT scans, MRIs scan, PET scans, nuclear scans, electrocardiogram, EEG, EKG, arteriograms, Doppler reports/data, photographs, videotapes, molds, microscopic slides, tissue blocks or other diagnostic tests not mentioned herein.

6. Any and all medical records relating to any admissions of Plaintiff Lakeyshia Moody to Co-Defendant Philadelphia Women's Center, Inc. or any medical facility owned, operated and/or controlled by Co-Defendant Philadelphia Women's Center, Inc.

7. Any and all medical records relating to any treatment you provided to Plaintiff Lakeyshia Moody, at any time.



8. Any and all photographs, maps, diagrams or sketches concerning this action, including photographs, videotapes, movies and/or photographic reproductions that relates to any procedures performed in this action and/or the injuries sustained; photographs, videotapes, movies and/or photographic reproduction taken of Plaintiff during Defendant's treatment and/or professional relationship with Plaintiff and any and all drawings, diagrams, models, sketches, slides or videotapes which pertain to the occurrence in question.

9. Any and all documents or other tangible materials of any nature whatsoever which you plan to have marked for identification at a deposition or trial, introduce into evidence at a deposition or trial, or about which you plan to question a witness at a deposition or trial.

10. Any and all documents and communications containing the name and home and business addresses of all individuals contacted as potential witnesses.

11. The resume or curricula vitae of any and all expert witnesses who will testify at trial and any other documents pertaining to the credentials and qualifications of any and all experts to be called by Defendants at trial.

12. Any and all expert reports that were or will be relied upon in whole or in part by any testifying expert in this case.

13. A complete list of any articles, manuals, textbooks, policy sheets, position statements, treatises or other authoritative literature which any expert relied upon, reviewed in forming their opinion, or intends to rely on in his testimony in this case.

14. Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment, including umbrella and excess policies.

15. Any and all documents concerning any reservation of rights under which this case is being defended.

16. Copies of internal memoranda, inter-office memos, facsimiles, e-mails or other documents or communications regarding this claim, made by Defendant(s), or any agent or employee of Defendant(s), or their insurance carrier(s).

17. Any and all reports, communications, or documents prepared by Defendant(s) or their agents or employees, concerning the facts, circumstances, and causes of this alleged incident.

18. Any and all documents and communications substantiating any defense to Plaintiff's cause of action.

19. All documents and/or communications relating to any facts on the basis of which it is asserted that the conduct of the Plaintiff contributed to the happenings of the alleged occurrence or to the alleged injuries or losses suffered allegedly as a result of this accident.

20. Any and all settlement agreements, wherein you have arrived at a settlement or agreement between you and any other person, whether or not a party to this lawsuit, regarding or pertaining to the incident made the basis of this lawsuit or any damages resulting therefrom.

21. Any or all documents or communications of any nature whatsoever that relates to refers to, or pertains to Plaintiff, any other party to this action, the incident, the incident site, or any instrumentality involved in the incident described in Plaintiff's Complaint.

22. Any and all documents referring or relating in any way, directly or indirectly, to the acts, events or circumstances alleged in the Complaint.

23. Any photograph, videotape, movie or any other photographic reproduction in your possession which was taken by you or by any other individual which relates in any way to the any procedures made the subject of this lawsuit, or any injuries suffered as a result of the procedures.

24. A copy of Answering Defendant's resume or curriculum vitae.

25. Any and all documents relied upon or consulted or referred to in connection with preparing your responses.

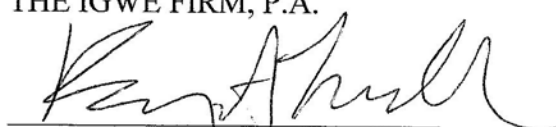
26. All documents not supplied in response to preceding requests for production of documents which you intend to introduce at the time of trial, including any documents, photographs, or other physical evidence which will be used or offered at trial.

27. All documents not supplied in response to preceding requests for production of documents and identified in your answers to interrogatories.

28. Any and all certifications, degrees, diplomas, certificates, licenses or any other documents and/or documentation relating to Answering Defendant's obstetrics, gynecological, and/or abortion training.

These requests are deemed to be continuing insofar as if any of the above is secured *subsequent* to the date herein for the production of same, said documents, photographs, statements, reports, etc., are to be provided to Plaintiffs' counsel within thirty (30) days of receipt of same.

DATED: 8/31/15

THE IGWE FIRM, P.A.  
BY:   
KELLY A. TREWELLA, ESQ.

**THE IGWE FIRM, P.A.**  
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**ATTORNEY FOR PLAINTIFF**

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LAKEYSHIA MOODY	:	COURT OF COMMON PLEAS OF
	:	PHILADELPHIA COUNTY
	:	
	:	JUNE TERM, 2015
vs.	:	
	:	NO. 0239
	:	
PHILADELPHIA WOMEN'S CENTER	:	Case ID: 150600239
and TAIDA WOLFE, M.D.	:	
	:	

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**PLAINTIFF'S INTERROGATORIES (SET I) ADDRESSED TO  
DEFENDANT, PHILADELPHIA WOMEN'S CENTER, INC.**

The plaintiff, by and through her attorney, Kelly A. Trewella, Esq., hereby makes demand that defendant answer the following Interrogatories under oath, within thirty (30) days pursuant to Pennsylvania Rules of Civil Procedure Nos. 4005 and 4006. These Interrogatories are to be deemed continuing so as to require further answer from now until the time of trial, without further notice, if you learn further information called for herein. These Interrogatories are addressed to you as a party to this action and your answer shall be based upon the information known to you, your attorney, or other representative.

**DEFINITIONS**

For purposes of clarity and convenience, the "Definitions" are set forth below rather than repeated in each Interrogatory. Therefore, the "Definitions" are incorporated by reference in each Interrogatory.

1. The term "document" or "written communication" shall mean the original and/or copy regardless of origin or location, of any books, pleadings, and discovery matters, pamphlets, correspondence, letters, memoranda, telegrams, reports, transcripts (including transcripts of testimony), statements, studies, records, calendar or diary entries, notes, charts, tabulations, graphs, tapes, data processing cards, minutes or notes of meetings, and any written, printed, recorded or graphic matter, photographic matter, sound reproductions, however produced,

reproduced or prepared during or referring to, or related to, the periods specified herein, as well as any other information relating to the Interrogatory recorded by any means by which

information is recorded, transmitted, retained or preserved, to the extent that any documents, as defined above, is in the custody, control, possession or accessible to the defendant.

2. The term "oral communication" shall mean all non-written communications, whether made face to face, by telephone, or otherwise.

3. The term "date" shall mean the exact day, month, and year, if ascertainable or, if not, the best approximation thereof. Approximation of a date may be made by reference to that date's relationship to other events.

4. The terms "you" or "your" shall mean all named parties and/or answering party, their officers, employees, agents or representatives, including attorneys, accountants and auditors. Further, the source of information for each response to each Interrogatory shall be identified unless instructions to the contrary appear in the Interrogatory.

5. The term "defendants" shall mean all defendants collectively or, if appropriate, any defendant to which the Interrogatory or Document Request applies.

6. The term "plaintiff" shall refer to the individual who commenced this action or plaintiff's decedent where pertinent.

7. The term "all documents" means every document as above defined, known to you and every such document which can be located or discovered by reasonable diligent efforts.

8. The term "representative" shall mean anyone acting on behalf of a party, including but not limited to officers, employees, agents, attorneys, accountants, auditors, etc.

9. The term "witness" means all individuals who have or in their opinion may or should have knowledge of the factual allegations contained in plaintiff's Complaint, as well as all of those who have been interviewed or contracted by defendant, or from whom defendant obtained any information.

### **INTERROGATORIES**

1. Identify the nature or status of the relationship between you and Co-defendant Dr. Taida Wolfe, M.D. and identify whether and what privileges have been granted by you to co-defendant Taida Wolfe, M.D.

(a) Please consider this a request to produce all records, each and every contract, or other document establishing or otherwise referring to the relationship between you and Co-defendant Taida Wolfe, M.D. and/or document(s) relating to the privileges granted by you to co-defendant Taida Wolfe, M.D.

2. Set forth the dates you have had professional contact with the plaintiff, Lakeyshia Moody.

- (a) Please consider this a request to produce all records relating to said professional contact.

3. State whether you were covered by or were the subject of any policy of liability insurance, including excess or umbrella insurance for the injuries arising out of the instant case.

4. If the answer to the preceding Interrogatory is in the affirmative, state the following as to each such policy of insurance:

- (a) The name of each insured under the policy;
- (b) The period of the policy;
- (c) The amount of coverage provided by the policy for bodily injury liability for each person, for each occurrence and in the aggregate;
- (d) The amount of coverage remaining for satisfaction of any judgment in this case;
- (e) The type of policy;
- (f) The name of the carrier which issued the policy.
- (g) State whether your facility is entitled to any excess coverage above \$1,000,000.00.
  - (1) If so, state the amount and the insurance company providing this insurance coverage.
  - (2) If said excess coverage is through self-insurance, please provide that information as well.
- (h) Please consider this a request to produce a copy of any and all insurance policies or self-insurance policies applicable to this claim.

5. If the answer to Interrogatory 4 is in the affirmative, state whether any exclusion under the policy is or may be applicable to any claim presented by this lawsuit.

6. If the answer to Interrogatory 5 is in the affirmative, state the precise language of each exclusion which is or may be applicable, and in summary form, state why such exclusion is or may be applicable.

7. State whether this case is being defended by the attorney who has entered his appearance on your behalf subject to a reservation of rights agreement between you and your insurance carrier.

8. If the answer to Interrogatory 7 is in the affirmative, as to each reservation of rights agreement, state the following:

- (a) The name of each party to the agreement;
- (b) The date the agreement was entered into;
- (c) According to your information, what is the stated position of the carrier as to the reservation of rights?
- (d) Please consider this a request to produce the aforementioned reservation of rights agreement.

9. Have you or anyone acting on your behalf obtained from any person any statements concerning this action or its subject matter? If so, state:

- (a) The name and last known address of each such person;
- (b) When, where, by whom and to whom each statement was made; and whether it was reduced to writing or otherwise recorded; and
- (c) The name and address of any person who has custody of any such statements that were reduced to writing or otherwise recorded.
- (d) Please consider this a request to produce those statements referred to in the above answer.

10. Have you or any of your employees, representative, or agents given any statement concerning this action or its subject matter? If so, state:



- (a) The name and address of each person to whom a statement was given; and
- (b) When and where each statement was given;
- (c) Please consider this a request to produce statements referred to in the above answer.

11. Have you or anyone on your behalf or on behalf of your insurance carrier, conducted any investigations of the abortion, treatment, or examination which is the subject matter of the Complaint?

12. If the answer to the preceding Interrogatory is in the affirmative, state:

- (a) The name, address, and employer of all persons who conducted any investigations;
- (b) The dates of the investigations; and
- (c) The dates of any reports of any investigations and the identity of the persons who have possession thereof;
- (d) Please consider this a request to produce your investigation reports, except those portions which are protected from discovery by Pennsylvania Rule of Civil Procedure 4003.3.

13. State the name and address of each person whom you expect to call as an expert witness at trial and state the subject matter on which the expert(s) is expected to testify.

- (a) For each such expert, state or have the expert state the substance of the facts and opinions to which the expert is expected to testify and summarize the grounds for each such opinion. (Expert's(s') reports containing the same information may be attached in lieu of an answer);
- (b) If the expert is employed and/or self-employed, identify the employer and the nature of employment thereof;
- (c) Identify all documents submitted to the expert and all products and/or locales inspected by the expert in connection with preparations for his/her testimony; and

- (d) Set forth the qualifications of each expert listing the schools attended, years of attendance, degrees received, experience in any particular field or specialization or expertise, all publications authored, including the title of the work and the book in which it was printed giving, the date of publication, as well as articles published in professional journals.

14. If you deny that your agents, servants, and/or employees were negligent, set forth the facts that support the basis of your denial.

15. Do you claim that Plaintiff Lakeyshia Moody was contributorily or comparatively negligent and/or assumed the risk? If so, state the basis of your claim.

16. Do you contend that any individual or entity, not a party to this instant action, caused or contributed in any manner to the injuries alleged in the Complaint?

17. If your answer to the preceding Interrogatory is in the affirmative, identify the individual and/or entity and state with particularity the manner in which you contend that the conduct contributed to the injuries alleged?

18. Identify all policies, procedures, protocols, guidelines, algorithms, care and/or critical pathways, order procedure forms, care templates, rules, regulations, manuals, handbooks, collection of orders or notices or other documents pertaining to the performance of abortion(s), ultrasound-guided abortion(s), second trimester abortion(s) and/or ultrasound guided second trimester abortion(s) which were in effect at Philadelphia Women's Center in December 2014.

19. Identify any and all physicians who participated in the medical care and treatment of Plaintiff Lakeyshia Moody on December 16-18, 2014.

20. State the name and last known address of each person who a) was a witness to the abortion, treatment or examination through sight or hearing; and b) has knowledge of facts concerning the happening of the abortion, treatment, or examination or conditions or circumstances at the time of abortion, treatment, or examination prior to, after, or at the time of

the accident excepting those persons who acquired such knowledge during the course of this litigation.

21. With respect to each person identified in the answer to Interrogatory # 20, state that person's exact location and activity at the time of the abortion, treatment, or examination.

22. Do you know of the existence of any photographs, diagrams, or models of the surrounding area or the areas of the abortion, treatment, or examination or any other matters or things involved in this abortion, treatment, or examination?

23. If the answer to the preceding Interrogatory is in the affirmative, state:

- (a) The date(s) when such photographs, diagrams or models were made;
- (b) The name and address of the party making them;
- (c) When they were made; and
- (d) The object(s) or subject(s) each photograph, diagram, or model represents.
- (e) Please consider this a request to produce the photographs, diagrams, and/or models referred to above.

24. State whether you contend that any of the injuries alleged were in whole or in part due to any prior or subsequent accident or medical condition.

25. If your answer to the preceding Interrogatory is in the affirmative state:

- (a) The exact nature of each such accident or medical condition;
- (b) When it occurred;
- (c) How, if at all, it contributed to plaintiff's physical condition; and,

- (d) The source of your information.

26. State the names and last known business/residence address of witnesses who have knowledge or any of the following facts:

- (a) The medical condition of patient prior to the incident complained of;
- (b) The medical condition of patient subsequent to the incident complained of;
- (c) The explanation given to the patient or relatives about the medical treatment given; and,
- (d) Treatment rendered to the patient.

27. State whether any additions, corrections, alterations, or changes were made to plaintiff's medical chart at any time.

28. If your answer to the preceding Interrogatory is in the affirmative, indicate:

- (a) When each addition, correction, alteration or change was made;
- (b) The exact nature thereof;
- (c) The circumstances thereof; and,
- (d) The name, address, and position of the person involved.

29. Are you aware of any information that any of the injuries alleged in the Complaint to have been suffered by Plaintiff are due in whole or in part to any defect or mechanical failure or unusual or improper operation of any equipment or medical supplies used during the course of plaintiff's treatment?

30. If your answer to the preceding Interrogatory is in the affirmative, describe with particularity the nature of the equipment or supplies to which you refer, including the manufacturer's product name, trade name, model number and the year purchased.

- (a) Further, as of the date acquired, state the names and addresses of both the manufacturer and distributor of the said equipment or supplies, how the equipment or supplies contributed to this condition and your source of information in that regard.

31. Except as described in answers to any of the preceding Interrogatories, do you contend that any person or entity other than defendants or any agents, servants, or employees of one or more of the defendants caused or contributed in any manner to the injuries alleged in the Complaint?

32. If your answer to the preceding Interrogatory is in the affirmative, identify the names and addresses of each person or entity, their relationship with any of the defendants, and state with particularity the manner in which you contend that the conduct caused or contributed to the injuries alleged.

33. Identify the names and addresses of all fact witnesses you intend to call at the time of trial.

34. For each person identified in your answer to the preceding Interrogatory, provide a summary of what you expect each fact witness to testify to at the time of trial.

35. Please provide the name, address, and position of the person who supplied the information in the answers to each of the foregoing interrogatories.

DATED: 8/31/15

BY: 

KELLY A. TREWELLA, ESQ.

**THE IGWE FIRM, P.A.**  
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kelly@igwefirm.com

**ATTORNEY FOR PLAINTIFF**

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LAKEYSHIA MOODY	:	COURT OF COMMON PLEAS OF
	:	PHILADELPHIA COUNTY
	:	
	:	JUNE TERM, 2015
vs.	:	
	:	NO. 0239
	:	
PHILADELPHIA WOMEN'S CENTER	:	Case ID: 150600239
and TAIDA WOLFE, M.D.	:	
	:	

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**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT PHILADELPHIA WOMEN'S CENTER, INC.**

You are requested to produce, in accordance with Pennsylvania Rule of Civil Procedure 4009, the originals or clear, readable copies of the below listed documents and/or items. These documents and/or items will be examined and/or photocopied; photograph negatives will be processed and photographs reproduced, videotapes and audiotapes shall be viewed and/or heard and a copy made. The below listed documents and/or items are to be produced at Plaintiff's counsel's office on or before thirty (30) days from the date of service herein. Such request is continuing up to and at the time of trial.

**DEFINITIONS**

A. "You" or "your" refers to Defendant(s) herein and to all other persons acting or purporting to act on behalf of Defendant(s), including agents and employees.

B. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, telexes, advertisements, facsimiles, e-mail, or other forms of verbal and/or communicative intercourse.

C. "Documents" shall mean all written or graphic matter of every kind or description, however, produced or reproduced, whether draft or final, original or reproduction signed or unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed,

including but not limited to: written communications, letters, correspondence, facsimiles, e-mail, memoranda, minutes, notes, films, recordings, of any type, transcripts, contracts, agreements, purchase or sales orders, memoranda of telephone conversations of personal conversations, diaries, desk calendars, interoffice communications, reports, studies, bills, receipts, checks, checkbooks, invoices, requisitions or material similar to any of the foregoing however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control or to which you have had or can obtain access.

D. "Persons" means an individual, corporation, partnership, trust, associations, company, organization, or any form of a business or commercial entity.

E. "Identify" when used with respect to an individual, means to state (1) their name; (2) business affiliation and official title and/or position; and (3) their last known residential and business address.

F. "Identify" when used with respect to a document, means to state (1) the type of document (e.g. letter, memorandum, hand-written note, facsimile, e-mail); (2) its date of origin or creation; (3) its author and addressee; (4) its last known custodian or locations; and (5) a brief description of its subject matter and size. In lieu of identifying any document(s), you may attach a copy of it to your answer, indicating the question to which it is responsive.

G. "Identify" when used with respect to a company or other business entity, means to state, (1) the company's legal name, any former names, and the name under which it trades or does business (2) the address of its principal place of business; and (3) the identity of its chief executive officer.

H. "Relate to" means consist of, refer to, reflect or be in any way logically connected with the matter discussed.

I. The period of time encompassed by these requests shall be from the date of the alleged accident to the date of answering, unless otherwise indicated. Note, this request is continuing up to and at the time of trial.

J. For purposes of the Rule, a statement includes:

(1) A written statement, signed or otherwise adopted or approved by the person making it, or

(2) A stenographic, mechanical, electronic, videographic, or other recording, or a transcript thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

### **REQUESTS TO PRODUCE**

1. All claims and investigation files prepared by Defendant's representatives, including its attorneys in anticipation of the above-captioned lawsuit or trial thereof. (This Request does not include disclosure of the mental impression of defendant's attorneys or their conclusions, opinions, memoranda, notes or summaries, legal research or legal theories. With respect to the representatives of defendant other than their attorneys, this Request shall not include disclosure of their mental impressions, conclusions, or opinions respecting the value or merit of a claim or defense, or respecting strategy or tactics.)

2. Any and all statements concerning the action, from all witnesses including any statements from the parties herein, or their respective agents, servants or employees, including taped recordings, whether transcribed or not, and all written statements.

3. Any and all written contracts, agreements of employment, or indemnification agreements in existence in December 2014 between Answering Defendant and Co-Defendant Dr. Taida Wolfe, M.D.

4. Any and all records, contracts, or other document establishing or otherwise referring to the relationship between you and Co-Defendant Dr. Taida Wolfe, M.D., and/or document(s) relating to the privileges granted by you to Co-Defendant Dr. Taida Wolfe, M.D.

5. Any and all medical records relating to any admissions of Plaintiff Lakeyshia Moody to any medical facility owned, operated and/or controlled by Answering Defendant, Philadelphia Women's Center, Inc.

6. Any and all medical records relating to any treatment you provided to Plaintiff Lakeyshia Moody at any time.

7. Any and all photographs, maps, diagrams or sketches concerning this action, including photographs, videotapes, movies and/or photographic reproductions that relates to any procedures performed in this action and/or the injuries sustained; photographs, videotapes, movies and/or photographic reproduction taken of Plaintiff during Defendant's treatment and/or professional



relationship with Plaintiff and any and all drawings, diagrams, models, sketches, slides or videotapes which pertain to the occurrence in question.

8. Any and all documents or other tangible materials of any nature whatsoever which you plan to have marked for identification at a deposition or trial, introduce into evidence at a deposition or trial, or about which you plan to question a witness at a deposition or trial.

9. Any and all documents and communications containing the name and home and business addresses of all individuals contacted as potential witnesses.

10. The resume or curricula vitae of any and all expert witnesses who will testify at trial and any other documents pertaining to the credentials and qualifications of any and all experts to be called by Answering Defendant at trial.

11. Any and all expert reports that were or will be relied upon in whole or in part by any testifying expert in this case.

12. A complete list of any articles, manuals, textbooks, policy sheets, position statements, treatises or other authoritative literature which any expert relied upon, reviewed in forming their opinion, or intends to rely on in his testimony in this case.

13. Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment, including umbrella and excess policies.

14. Any and all documents concerning any reservation of rights under which this case is being defended.

15. Copies of internal memoranda, inter-office memos, facsimiles, e-mails or other documents or communications regarding this claim, made by Defendant(s), or any agent or employee of Defendant(s), or their insurance carrier(s).

16. Any and all reports, communications, or documents prepared by Defendant(s) or their agents or employees, concerning the facts, circumstances, and causes of this alleged incident.

17. Any and all documents and communications substantiating any defense to Plaintiff's cause of action.

18. All documents and/or communications relating to any facts on the basis of which it is asserted that the conduct of the Plaintiff contributed to the happenings of the alleged occurrence or to the alleged injuries or losses suffered allegedly as a result of this accident.

19. Any and all settlement agreements, wherein you have arrived at a settlement or agreement between you and any other person, whether or not a party to this lawsuit, regarding or pertaining to the incident made the basis of this lawsuit or any damages resulting therefrom.

20. Any or all documents or communications of any nature whatsoever that relates to refers to, or pertains to Plaintiff, any other party to this action, the incident, the incident site, or any instrumentality involved in the incident described in Plaintiff's Complaint.

21. Any and all documents referring or relating in any way, directly or indirectly, to the acts, events or circumstances alleged in the Complaint.

22. Any photograph, videotape, movie or any other photographic reproduction in your possession which was taken by you or by any other individual which relates in any way to the any procedures made the subject of this lawsuit, or any injuries suffered as a result of the procedures.

23. Any and all policies, procedures, protocols, guidelines, algorithms, care and/or critical pathways, order procedure forms, care templates, rules, regulations, manuals, handbooks, collection of orders or notices, or other documents pertaining to the performance of abortion(s), ultrasound-guided abortion(s), second trimester abortions(s) and/or ultrasound guided second trimester abortion(s) which were in effect for Philadelphia Women's Center in December of 2014.

24. A copy of the Policy, Procedure, or Protocol Manual relating to the care of patients at Philadelphia Women's Center, Inc.

25. A copy of the Policy, Procedure, or Protocol Manual relating to abortion procedure(s) performed at Philadelphia Women's Center, Inc.

26. Any and all documents relied upon or consulted or referred to in connection with preparing your responses.

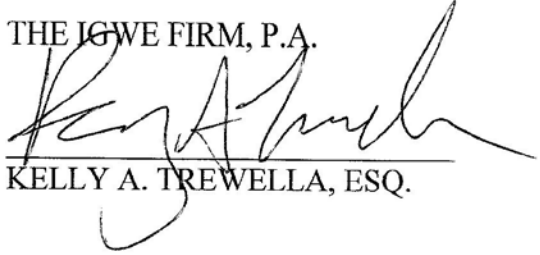
27. All documents not supplied in response to preceding requests for production of documents which you intend to introduce at the time of trial, including any documents, photographs, or other physical evidence which will be used or offered at trial.

28. All documents not supplied in response to preceding requests for production of documents and identified in your answers to interrogatories.

29. Any and all policies, procedures, protocols, guidelines, algorithms, care and/or critical pathways, order procedure forms, care templates, rules, regulations, manuals, handbooks, collection of orders or notices, or other documents pertaining to qualifications, certifications, degrees and/or training required of physicians performing abortions.

These requests are deemed to be continuing insofar as if any of the above is secured *subsequent* to the date herein for the production of same, said documents, photographs, statements, reports, etc., are to be provided to Plaintiffs' counsel within thirty (30) days of receipt of same.

DATED: 8/31/15

THE IGWE FIRM, P.A.  
BY:   
KELLY A. TREWELLA, ESQ.