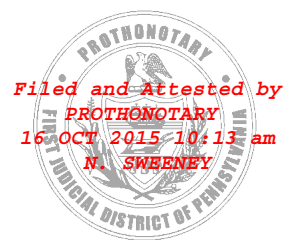


# *Exhibit 1*





A PROFESSIONAL ASSOCIATION  
Email: [emeka@igwefirm.com](mailto:emeka@igwefirm.com)

August 31, 2015

Donna Adelsberger, Esq.  
2782 Jenkintown Rd.  
Glenside, PA 19038

**RE: Moody v. Philadelphia Women's Center, Inc., et al.  
Philadelphia CCP; June Term, 2015; No.: 0239**

Dear Ms. Adelsberger:

Enclosed please find Plaintiff's Interrogatories (Set I) and Request for Production of Documents directed to your clients, Defendant Dr. Taida Wolfe, M.D. and Defendant Philadelphia Women's Center, Inc.

Kindly provide your clients' verified responses within the time and manner provided by the Pennsylvania Rules of Civil Procedure. Thank you.

Sincerely,  
THE IGWE FIRM, P.A.

KELLY A. TREWELLA, ESQ.  
Cell: 484-238-7848  
[kelly@igwefirm.com](mailto:kelly@igwefirm.com)

Enclosures

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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, TAIDA WOLFE, M.D.**

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. State the following details regarding your medical education and preparation for practice:
  - a. Medical school(s) attended, dates of attendance, and year(s) of graduation;
  - b. Place and period of internship;
  - c. Nature of subjects covered during internship;

- d. Names and specialties of physicians who trained you during internship;
  - e. Place and period of residency;
  - f. Subject of residency;
  - g. Names and specialties of physicians who trained you during your residency;
  - h. Nature and period of any graduate studies and where they were pursued;
  - i. Inclusive dates of any armed forces service; and
  - j. Nature of armed forces service, including nature of any medical experiences.
2. State the name of each medical organization, group, or society with which you are currently affiliated or of which you are a member.
3. State the date, place, subject matter and name of sponsoring institution of any seminars or refresher courses you have taken since the completion of medical school.
4. If you have ever been certified by any specialty board, or if you are now or have ever been a member of any specialty board, state:
- a. The name and address of each specialty board;
  - b. The date you were certified or re-certified or became a member; and

- c. If you are no longer certified or your membership was terminated, state the reason for such action.
- 5. Identify each state in which you currently hold a medical license, and each state in which you held a medical license in December 2014.
- 6. State whether you limit your practice to any particular field or specialty. If so, identify the field or specialty and the date you began limiting your practice to the field or specialty.
- 7. Identify the current status of your medical license, and identify the status of your medical license as of December 2014.
- 8. Has your medical license, in any state, ever been suspended, or revoked for any reason?
- 9. If the answer to the preceding interrogatory is in the affirmative, state the reason for the suspension or revocation, and the length of the suspension or revocation.
- 10. At the time you provided treatment to Plaintiff were you an employee of a professional corporation?
- 11. If so, state:
  - a. The name and address of the professional corporation(s);
  - b. The names, addresses, and corporate title of each corporate officer;

- c. Does this professional corporation have medical malpractice insurance coverage;
- d. If your answer to Interrogatory 11(c) is in the affirmative, provide the names and address of the insurance company which issued the policy and the amount of coverage available for this claim;
- e. Does this professional corporation have medical malpractice liability coverage in excess of the coverage;
- f. If your answer to Interrogatory 11(e) is in the affirmative, provide the name and address of the insurance company which issued the policy and the amount of coverage available for this claim; and
- g. Provide the dates of your employment with said professional corporation(s).

12. State the name and address of your employer at the time you provided treatment to the Plaintiff.

- a. Please consider this a request to produce all employment contracts between you and any employer in effect in 2014.

13. Identify all publications, including but not limited to papers, journal articles, letters to the editor, textbooks, symposiums, etc., which you authored or contributed to including the title of the work, the name of the journal, periodical or book in which it was printed, the pages you wrote and the date of its printing.

14. Identify by author, title, and year of publication every textbook on obstetrics/gynecology that you had in your office in 2014.

15. Identify by author, title, and year of publication every textbook on obstetrics/gynecology that you regularly referred to and/or relied upon in 2014.
16. State the name of each medical journal you subscribed to in the year 2014.
17. State the name of each medical journal you read regularly in the year 2014.
18. Identify each office, clinic, or other location relating to the practice of medicine maintained by you, or in which you otherwise worked, subsequent to your internship or residency and set forth the inclusive dates you maintained/worked at each such location.
19. State the names of all medical centers and/or hospitals with which you were affiliated prior to your affiliation with Co-Defendant Philadelphia Women's Center, Inc.
  - a. With respect to each such hospital or medical center set forth your positions and responsibilities.
20. State the names of all hospitals and medical schools with which you are presently affiliated.
  - a. With respect to each hospital or medical center set forth your position(s) and responsibilities.
21. Were you associated, or in partnership with, any other medical practitioner at the time of the occurrences which are the subject of this action?
22. If so, state:
  - a. The name, address, specialty, and qualifications of each person with whom you were associated;



- b. The nature of your association with such person;
- c. The terms and conditions of the association (partnership, professional corporation, corporation, etc.);
- d. The date you formed the association;
- e. Whether the association still exists, and if not, the reason and date it was terminated;
- f. Whether any written agreement existed between you and your associates, and if so, the name and address of the person who has custody of the agreement; and
- g. Please consider this a request to produce any agreement referred to in answering this Interrogatory.

23. Identify each and every contract or other document establishing or otherwise referring to the relationship between you and Co-Defendant Philadelphia Women's Center, Inc.

24. Identify the nature or status of the relationship between you and Co-Defendant Philadelphia Women's Center, Inc. and identify whether and what privileges have been granted to you by Philadelphia Women's Center, Inc.

- 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 Philadelphia Women's Center, Inc.

25. State the dates you had professional contact with the plaintiff.

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

26. 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.

a. If so, state:

- i. The name of each insured under the policy;
- ii. The period of the policy;
- iii. The amount of coverage provided by the policy for bodily injury liability for each person, for each occurrence and in the aggregate;
- iv. The amount of coverage remaining for satisfaction of judgment in this case;
- v. The type of policy;
- vi. The name of the insurance company which issued the policy;
- vii. State whether you have any umbrella or excess coverage in excess of \$1,000,000 dollars which covers you for acts of medical negligence; and, if so, the amount of coverage in excess of \$1,000,000 dollars; and
- viii. Please consider this a request to produce a copy of the Declaration Sheet.

27. If the answer to the preceding Interrogatory is in the affirmative, state whether any exclusion under the policy is or may be applicable to any claim presented by plaintiff's complaint.

28. If the answer to the preceding Interrogatory is in the affirmative, state the precise language of each exclusion which is or may be applicable, and in summary form, the facts on the basis of which it is contended each such exclusion is or may be applicable.
29. State whether this case is being defended by the attorney who has entered his/her appearance on your behalf subject to a reservation of rights agreement between you and your insurance carrier.
- a. Please consider this a request to produce the aforesaid reservation of rights agreement in accordance with Pa.R.C.P.4009.
30. If the answer to the preceding Interrogatory 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; and
  - c. According to your information, what is the stated position of the insurance carrier as to the reservation of rights?
31. With respect to any conversations of which you are aware, in which the nature of the alternatives to and/or risks of the procedure in question were discussed with the patient, set forth:
- a. The date of each conversation;
  - b. The substance of each conversation;
  - c. The identity of each party of the conversation;
  - d. The identify of each witness to the conversation; and

- e. Were there any documents relating to the nature of, alternative to, and/or risk of the procedure presented to the patient? If so, please consider this a request to produce such document or documents.

32. Did you ever consult with any other physician in connection with the care and treatment of the patient? If so, set forth:

- a. The dates of the consult;
- b. The identity of the physician;
- c. The subject matter of the consultation;
- d. Action taken as a results of the consultation; and
- e. The identity of documents relation to the consultation.
- f. Please consider this a request to produce the documents referred to in (e).

33. State the name and last known address of each person who:

- a. Was a witness to the abortion procedure, treatment and/or examination through sight or hearing; and
- b. Has knowledge of facts concerning the happening of the abortion procedure, treatment and/or examination or conditions or circumstances at the time of the abortion procedure, treatment and/or examination prior to, after, or at time of the occurrence which is the subject of this suit, excepting those persons who acquired such knowledge during the course of this litigation.

34. With respect to each person identified in the preceding interrogatory, state that persons exact location and activity at the time of the abortion procedure, treatment and/or examination.

35. Have you or anyone acting on your behalf obtained from any person any statements given with regards to this action? 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.

36. Have you answered any questionnaire or 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 the questionnaires or statements referred to in the above answer.

37. Have you, or anyone on your behalf, conducted any investigations of the abortion, treatment, or examination which is the subject matter of this lawsuit?

38. If the answer to 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;
- c. The dates of any reports of any investigations and the identity of the persons who have possession thereof; and
- d. Please consider this a request to produce your investigation reports, except those portions which are protected from discovery.

39. 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 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 such opinion.
- b. If the expert is employed and/or self-employed, identify the employer and the nature of the 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 testimony; and
- d. Set forth the qualifications of each expert, listing all schools attended, years of attendance, degrees received, experience in any particular field of 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.

40. If you deny you were negligent, set forth the facts that support the basis of your denial.

41. Do you contend that the plaintiff was contributorily or comparatively negligent and/or assumed the risk or caused or contributed in any way to the injuries alleged in the Complaint?

- a. If yes, state the basis of a claim of contributory or comparative negligence and/or assumption of the risk and describe with particularity the manner in which you contend that plaintiff contributed to his/her condition and the source of your information.

42. Do you contend 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?

- a. If yes, describe with particularity the nature of the equipment or supplies to which you refer, the address, the manufacturer and distributor of the said equipment or supplies, how the equipment or supplies contributed to this condition and your source of information.

43. 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 plaintiff(s) Complaint?

- a. If yes, identify the individual and/or entity and state with particularity:
  - i. The manner in which you contend that the conduct contributed to the injuries alleged;
  - ii. Your source of information; and
  - iii. The relationship of such individual and/or attorney with any of defendants.

44. 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 plaintiff(s) Complaint?

a. If yes, identify the individual and/or entity and state with particularity:

i. The manner in which you contend that the conduct contributed to the injuries alleged;

ii. Your source of information; and

iii. The relationship of such individual and/or attorney with any of defendants.

45. Please state whether you received any training on abortions. If so, please state:

a. The nature of such training;

b. Dates of such training;

c. Certification or degree acquired;

d. Place and period of such training;

e. Names and specialties of physicians who trained you.



46. Please state how many abortions you performed prior to December 18, 2014.
47. What records, regarding any prior medical history of the plaintiff, had you in your possession prior to the dates of treatment alleged in the Complaint.
48. Has any disciplinary action ever been taken against you in connection with your medical license?
- a. If so, give the dates and details thereof.
49. Have you ever been a named defendant in a lawsuit arising out of malpractice or professional negligence? If so, state:
- a. The jurisdiction in which the case was brought;
- b. The caption of the case;
- c. The court term and number;
- d. If you gave any depositions or testimony in the case and the dates of the deposition and/or testimony; and
- e. The ground of negligence alleged.
50. Have you ever testified in court in a medical malpractice case? If so, state:
- a. the full caption of the case;

- b. the court term and number thereof;
- c. the approximate date of such testimony;
- d. the subject matter of such testimony; and
- e. the names and addresses of the attorneys involved.

51. Identify the names and last known addresses of all witnesses you intend to call at the time of trial.

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

53. Do you intend to testify as an expert on your own behalf at the time of trial?

- a. If so, provide a summary of the facts and opinions to which you will testify and a summary of the basis for each such opinion.

54. Please provide the name, address, and position of the person who supplied the information used in answering these Interrogatories.

DATED: 8/31/15

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 REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT DR. TAIDA WOLFE, M.D.**

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.