

Donna L. Adelsberger, Esquire
DONNA ADELSBERGER & ASSOCIATES, P.C.
I.D. No. 53070
2782 Jenkintown Road
Glenside, PA 19038
215-576-8690
215-576-8695(fax)

Attorney for Defendants,
Philadelphia Women's Center, Inc. and
Taida Wolfe, M.D.

LAKEYSHIA MOODY :
 :
 :
 vs. :
 :
 :
 PHILADLEPHIA WOMEN'S CENTER :
 and TAIDA WOLFE, M.D. :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
JUNE TERM, 2015

No. 0239


**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

TO: Stacy L. Shields, Esquire
Shields Law Group, LLC
1845 Walnut Street, Suite 13
Philadelphia, PA 19103

Defendants, Philadelphia Women's Center, Inc. and Taida Wolfe, M.D., intend to serve a Subpoena identical to the one that is attached to this Notice to Dr. C. Tyrone Jennings, requesting records be produced at 2782 Jenkintown Road, Glenside, PA 19038. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to this Subpoena. If no objection is made, the Subpoena may be served.

DONNA ADELSBERGER & ASSOCIATES, P.C.

Dated: February 16, 2017

BY: 

Donna L. Adelsberger, Esquire
Attorney for Defendants, Philadelphia
Women's Center, Inc. and Taida Wolfe,
M.D.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

MOODY VS PHILADELPHIA WOMEN'S CENTER, INC. ETAL

June Term, 15

No. 00239

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. C. Tyrone Jennings, Ph.D., Custodian of Record
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

Please see attached.

at: 2782 Jenkintown Road Glenside PA 19038
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Adelsberger, Donna L
Address: Donna Adelsberger & Assoc
2782 Jenkintown Road
Glenside, PA 19038

Date: February 16, 2017

Telephone: 215 576-8690

Supreme Court ID#: 53070

Attorney for: Defendant



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

MOODY VS PHILADELPHIA WOMEN'S CENTER, INC. ETAL:

Court of Common Pleas

:
:
:
:
:

June Term, 15

No. 00239

TO: Dr. C. Tyrone Jennings, Ph.D., Custodian of Record
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

In response to this Subpoena, bring with you the following:

Any and all records, including but not limited to: the interview interrogatives and answers that you reference in your report of March 28, 2016, bills, reports, in-patient records, out-patient records, charts, patient histories, test results, referrals, prescriptions, correspondence (including correspondence to/from counsel), files, memoranda, progress and nurses' notes, order charts, office notes (handwritten and typed), e-mails, lab reports, treatment charts, clinical abstracts, etc. relating to any examination, consultation, care or treatment of the following patient, for the past five years up to and including the present:

Lakeyshia Moody
3245 N. 26th Street
Philadelphia, PA 19132

DOB: 6/17/83

SS#

