

FILED

2020 FEB 20 PM 2:43

CIVIL DISTRICT COURT

CIVIL DISTRICT COURT

PARISH OF ORLEANS

STATE OF LOUISIANA

BANKERS HEALTHCARE GROUP LLC

VERSUS

DEANZ HEALTH CARE FOR WOMEN, L.L.C. d/b/a CENLA TOTAL CARE and RASHONDA L. DEAN

CHELSEY RICHARD NAPOLEON
CLERK, CIVIL DISTRICT COURT
402 CIVIL COURTS BUILDING
421 LOYOLA AVENUE - ROOM 402
NEW ORLEANS, LA 70112
DOCKET NO. 2019-12301

SECTION: D-12

504-407-0000

Receipt Date 2/21/2020 9:52:00 AM
Receipt Number 806230
Cashier ehaniston
Register CDC Cash Register 3

EX PARTE MOTION FOR JUDGMENT DEBTOR EXAMINATION AND REQUEST FOR PRODUCTION OF DOCUMENTS

The *ex parte* motion of Bankers Healthcare Group LLC ("BHG"), respectfully represents that:

Grand Total \$ 71.00
Balance Due \$ 24.00
Over Payment \$ 0.00

Payment/Transaction List

- 1. Check # 30809 \$47.00

BHG is a judgment creditor pursuant to a judgment rendered against Deanz Health Care for Women, L.L.C. d/b/a Cenla Total Care ("Deanz Health Care") and Rashonda L. Dean ("Dean") (collectively, the "Judgment Debtors"), *in solido*, in the captioned matter, signed on December 9, 2019, in the amount of TWO HUNDRED EIGHTEEN THOUSAND FIVE HUNDRED NINETY-NINE AND 86/100 (\$218,599.86) DOLLARS; plus post-judgment interest that has accrued, and that continues to accrue, thereon, plus all attorneys' fees and costs incurred by BHG in connection with the enforcement of the Judgment (the "Judgment"). A copy of the Judgment is attached hereto for reference as Exhibit A.

	Charged	Paid	Bal
Motion to Examine Ju	\$47.00	\$47.00	\$0.00
Request for Producti	\$22.00	\$0.00	\$22.00
Exhibits (Paper)	\$2.00	\$0.00	\$2.00

2.

No payments have been made on the Judgment since it was rendered.

3.

BHG desires to examine Rashonda L. Dean, individually and in her capacity as an officer of Deanz Health Care for Women, L.L.C. upon all matters pertaining to Dean's or Deanz Health Care for Women, L.L.C.'s assets, financial condition and property, pursuant to Articles 2451 *et seq.* of the Louisiana Code of Civil Procedure.

VERIFIED
Clark Pittman
2-26-20

4.

BHG requests the production of any and all documents and papers of the Judgment Debtors including, but not limited to the following matters:

- a) For each bank, credit union, money market, checking, or savings account which each Judgment Debtor has had within the past 40 months:
 - a(1) Account statements for the last 36 months;
 - a(2) Checkbooks for the last 36 months.

- b) For each stock brokerage, annuity, IRA, or 401K account which each Judgment Debtor has had within the past 40 months:
 - b(1) Statements for the past 36 months;
 - b(2) Cancelled checks for the past 36 months;
 - b(3) Records of deposits and transfers for the past 36 months.

- c) For each safety deposit box which each Judgment Debtor has had within the past 120 months:
 - c(1) A copy of the box agreement, bills for box rent, documents evidencing content of the box;
 - c(2) A list of items removed from the box since the date of the judgment.

- d) For each Trust wherein any Judgment Debtor now is, or within 60 months was, a trustor, trustee, executor, beneficiary (or alternative of either):
 - d(1) All documents evidencing the trust's formation, funding, beneficiaries, recordation, property, or money transferred to the trust, any person or entity, or from the trust to any person or entity.

- e) Copies of all Louisiana State Tax returns, Federal Tax returns and any other State Tax returns filed by each Judgment Debtor in the last five years.

- f) All documents dated within the last 40 months relating in any way to:
 - f(1) Non-employment income and/or payments to any Judgment Debtor from any source;
 - f(2) Employment and income from employment;
 - f(3) Business activities of any kind;
 - f(4) Gifts, transfers and donations from any source or that any Judgment Debtor has made;
 - f(5) Property and money obtained, lent, borrowed, invested, sold, lost or abandoned;
 - f(6) Insurance policies any Judgment Debtor holds or has held within the past 36 months for home, business, vehicles, life insurance policies, any other insurance policies now in force, or in force within the past 12 months;
 - f(7) Any transfer exceeding \$500.00 in value any Judgment Debtor has made to a third person within the past 60 months.

- g) Property or money that any Judgment Debtor has immediate or contingent rights to which may be in the hands of others, including but not limited to:
 - g(1) Money or property owed to any Judgment Debtor by anyone;
 - g(2) Judgments or suits any Judgment Debtor has filed or that have been filed against any Judgment Debtor;
 - g(3) Applications for credit;
 - g(4) Loans and mortgages obtained or paid;
 - g(5) Refinancing of loans and mortgages;