**IN THE SUPERIOR COURT OF GEORGIA COUNTY**

**STATE OF GEORGIA**

JANE DOE and )

JOHN DOE, Individually )

and as Natural Parents, Guardians, and ) CIVIL ACTION FILE NUMBER

Next Friends of MINOR DOE, )

a Minor, ) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

 Plaintiffs, )

 )

v. ) **JURY TRIAL DEMANDED**

 )

HOSPITAL )

and DOCTOR, )

 )

 Defendants. )

 )

**PLAINTIFFS’ FIRST CONTINUING REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT HOSPITAL**

You are hereby notified, under the provisions of Section 34 of the Georgia Civil Practice Act, O.C.G.A. § 9-11-34(c), to produce for inspection and copying before Attorney Lee S. Atkinson, Blasingame, Burch, Garrard & Ashley, 440 College Avenue, Athens, Georgia 30601, on or before forty-five (45) days after serviced hereof at 10:00 a.m., where copying facilities are available, the following documents:

**DEFINITIONS**

 A. “Documents” is an all-inclusive term referring to any written, recorded, graphic or pictorial matter, however produced or reproduced. The term “documents” includes, without limitation, correspondence, interoffice communications, minutes, reports, memoranda, notes, schedules, drawings, pictures, x-rays, scans, tables, graphs, charts, books of account, ledgers, invoices, receipts, purchase orders, contracts, bills, checks, drafts, recordings; information stored in any form, including electronic, and optical; and all other such documents, tangible or retrievable, of any kind. “Documents” includes any addenda, changes, additions or deletions made to any documents, and all drafts or preliminary versions of documents.

 B. “Tangible items” includes all items of any physical substance other than “documents”.

 C. With respect to documents, “identify” means: (1) describe the document and its substance, and do so sufficiently to allow for description in a subpoena or a request to produce; (2) state the date(s) of preparation, any title, and the preparer(s); (3) identify the custodian sufficiently to allow for production of the document by subpoena or a request to produce.

 D. With respect to an individual, “identify” means to state: (1) his/her full name; (2) present residence address or last known residence address; (3) his/her present or last employer and address of such employer; and (4) his/her home and business telephone numbers.

 E. With respect to a firm, organization, trust, partnership, corporation or other entity (except an individual), “identify” means: (1) state the name of the entity; (2) state the type of entity (whether a corporation, partnership, etc.); (3) state the address of its principal place of business and any business address in Georgia; and (4) identify its chief executive officer.

 F. With respect to oral communications, “identify” means to: (1) state the identity of the person(s) participating in each such oral communication; (2) state the substance of such oral communication made by each person identified; (3) state the date and location of such oral communication.

 G. “You” includes all persons acting on your behalf, including all employees, officers, agents, servants, attorneys, investigators, contractors, experts, technicians, and other persons acting on your behalf. “You” also includes all subsidiaries, parents or affiliated companies.

 H. “Hospital” refers to the facility located at Address, Georgia 30000.

Privilege: If materials are withheld based on an objection that the materials are privileged or subject to protection as trial preparation material, describe the nature of the document, tangible item, communication, or information in a fashion sufficient to allow Plaintiffs to assess the objection.

 Objections: If objections other than privilege are asserted, the statement of a general objection is not sufficient. You are required to specify why asserted objection applies to the requested information or materials (e.g. “the request seeks materials that are not reasonably calculated to lead to the discovery of admissible evidence because . . .”). See Munn v. Munn, 116 Ga. App. 297, 299 (1967).

**Requests for production**

1.

 All contracts or agreements which you have entered into with Defendant Doctor pertaining to his provision of patient care services at Hospital and/or ENT. If you contend that any contract or agreement contains any confidential or privileged information, please produce a redacted copy of the file and a privilege log identifying the nature of the redacted information which you contend is privileged or confidential.

2.

 Any credentialing and similar files authorizing Defendant Doctor to provide medical care at Hospital and/or ENT. If you contend that any contract or agreement contains any confidential or privileged information, please produce a redacted copy of the file and a privilege log identifying the nature of the redacted information which you contend is privileged or confidential.

3.

 If not encompassed by Nos. 1 or 2 above, Defendant Doctor’s employment file. If you contend that any contract or agreement contains any confidential or privileged information, please produce a redacted copy of the file and a privilege log identifying the nature of the redacted information which you contend is privileged or confidential.

4.

Table of contents for all of your policies and procedures in effect and applicable to your patient care providers from January through May 2018.

5.

 Any and all reports obtained from any expert you expect to call at trial.

6.

All recorded or written statements by any person, including any Plaintiff, Defendant, or any other person in connection with or in any way relating to the subject matter of the present civil action.

7.

 A complete certified copy of each policy of insurance, including any umbrella policy and any other policy of insurance providing excess liability coverage, which, to your knowledge, information or belief, may provide coverage to you for any claim asserted against you in this civil action. (**NOTE**: this request seeks a complete certified copy of each such policy; a declarations page or other policy summary will not suffice as a response).

This \_\_\_\_ day of \_\_\_\_\_\_, 2020.