

1-31-07

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IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AN D FOR
BROWARD COUNTY, FLORIDA

CIVIL DIVISION 07002151

25

CASE NO.

RAQUEL WHITE and MAISONEL JEAN as
parents of EMMANUEL JEAN and on behalf
of RAQUEL WHITE and MAISONEL JEAN,
individually,

Plaintiffs,

vs.

A TRUE COPY

HOWARD C. FORMAN
CLERK OF CIRCUIT COURT

DARIO DAHY ALTAMIRANO, D.O.,
VICTORIA AQUINO CAMBA, D.O.,
SHERIDAN EMERGENCY PHYSICIAN
SERVICES, INC., AMN HEALTH CARE,
INC., JAMES BENSON-VALDES, R.N. AND
PLANTATION GENERAL HOSPITAL
LIMITED PARTNERSHIP, d/b/a
PLANTATION GENERAL HOSPITAL

JAN 31 2007

Defendants.

**REQUEST TO PRODUCE TO DEFENDANT, PLANTATION GENERAL HOSPITAL
LIMITED PARTNERSHIP, d/b/a PLANTATION GENERAL HOSPITAL**

PLAINTIFFS, RAQUEL WHITE and MAISONEL JEAN as parents of EMMANUEL JEAN
and on behalf of RAQUEL WHITE and MAISONEL JEAN, individually, request that the Defendant,
Plantation General Hospital, produce within forty-five (45) days of service, for examination, inspection
and copying the items listed below

1. Any and all medical records made and/or received in the course of business by
Plantation General Hospital relating to adverse medical incidents, which, per Article X §25 of the

Florida Constitution, includes records and/or reports of medical negligence, intentional misconduct and /or any other act, neglect or default of any of the Defendants named above. This request includes, but is not limited to those incidents that are required by State or Federal law to be reported to any governmental agency or body and incidents that are reported to or reviewed by any health care facility, peer review, mortality reviews, risk management, quality assurance, credentials or similar committee or any representative of such committees with all protection afforded to conceal patient identities where applicable.

2. Any and all documents or recordings of committee meetings or board meetings of Plantation General Hospital concerning the privileges of Dario Dahy Altamirano, D.O. kept or received in the course of business of Plantation General Hospital.

3. Any and all documents or recordings of committee meetings or board meetings of Plantation General Hospital concerning the privileges of Defendant, Victoria Camba , D.O. kept or received in the course of business of Plantation General Hospital.

4. A copy of the credentialing file of Dario Dahy Altamirano, D.O.

5. A copy of the credentialing file of Victoria Aquino Camba, D.O.

6. A copy of any board minutes, notes or recordings concerning any action, recommended or taken as to the privileges of the Defendant, Dario Dahy Altamirano, D.O.

7. A copy of any board minutes, notes or recordings concerning any action recommended or taken as to the privileges of the Defendant, Victoria Aquino Camba, D.O.

8. Provide the names and last known addresses for 2002 through 2006 for:

- a. Risk Manager
 - b. Quality Assurance Director
 - c. Chief Executive Officer
 - d. Managing Director/Administrator
 - e. Compliance Officer
8. Any and all peer review records of Defendant, Dario Dahy Altamirano, D.O. kept and maintained by Plantation General Hospital in the ordinary course of business from 2003 through 2006.
 9. Any and all peer review records of Defendant, Victoria Aquino Camba, D.O. kept and maintained by Plantation General Hospital in the ordinary course of business from 2003 through 2006.
 10. Any and all adverse incident reports or recordings pertaining to Raquel White and/or Emmanuel Jean.
 11. Any and all internal risk management documents or records concerning or pertaining to any incident involving Raquel White kept in the ordinary course of business at Plantation General Hospital.
 12. Any and all Code 15 reports or recordings made pursuant to the requirements of the Florida Administrative Code for each such serious patient injury reported within fifteen (15) days from the occurrence at Plantation General Hospital for the incident involving Raquel White and Emmanuel Jean.
 13. Any and all incident reports relating to the care and treatment rendered by Dario Dahy Altamirano, D.O. in the last four (4) years. All patient identifier names are to be redacted.

14. Any and all incident reports relating to the care and treatment rendered by Victoria Aquino Camba, D.O. in the last four (4) years. All patient identifier names are to be redacted.
15. Each and every policy, procedure, rule, regulation or protocol relating to investigation of adverse medical incidents, medical errors or mistakes, medical neglect or incidents wherein there has been a breach in the standard of care and/or practice that caused or could have caused an unintended injury or death to a patient in effect at your facility in the years 2003, 2004, 2005 that would be applicable to the incident at issue in this Complaint.
16. Any and all documents relating to the review of the incident at issue that occurred as it relates to Raquel White and Emmanuel Jean.
17. A copy of all policies, rules, regulations, procedures and protocols in existence at the time of this incident at Plantation General Hospital that pertained to quality improvement programs.
18. A copy of any and all statements taken by Plantation General Hospital of any health care provider as it relates to the care and treatment rendered to Raquel White and Emmanuel Jean.
19. A copy of any contract between Plantation General Hospital and Sheridan Emergency Physicians Services, Inc. in effect at the time of the incident at issue in this Complaint.
20. A copy of any contract between Plantation General Hospital and Dario Dahy Altamirano, D.O. in effect at the time of the incident at issue in this Complaint.
21. A copy of any contract between Plantation General Hospital and Victoria Aquino Camba, D.O. in effect at the time of the incident at issue in this Complaint.
22. A copy of any contract between Plantation General Hospital and AMN Healthcare, Inc.

in effect at the time of the incident at issue in this Complaint.

23. A copy of the 2005 credentialing file for James Benson-Valdes, RN as maintained by Plantation General Hospital.

24. A copy of any liability insurance policy in effect which would provide coverage for this claim. The entire policy is requested and not just a copy of the declaration sheet.

25. A copy of any excess insurance policy that may provide coverage for this claim.

26. A copy of Plantation General Hospital's By-Laws, Articles of Incorporation and all amendments thereto in effect in 2005.

27. A copy of Plantation General Hospital's protocol documents, policy and procedure manuals, as well as any and all hospital rules and guidelines relating to the obstetrical patient in effect in 2004 and 2005.

28. A copy of Plantation General Hospital's Emergency Staff By-Laws and amendments thereto in effect in 2004 and 2005.

29. A copy of the log logging Raquel White for her Emergency Room visit at issue in this claim.

30. A copy of the Emergency Log transferring Raquel White to the obstetrical unit and a copy of the obstetrical log logging her into OB.

31. A copy of any document demonstrating how many times Victoria Aquino Camba, D.O., while on staff at Plantation General Hospital Emergency Room had evaluated an obstetrical emergency patient. (Any patient name or identifier to be redacted)

32. A copy of any document demonstrating how many times Dario D. Altamirano, D.O., while on staff at Plantation General Hospital Emergency Room had evaluated an obstetrical emergency patient. (Any patient name or identifier to be redacted)
33. A copy of any informed consent provided by Raquel White for care and treatment by Plantation General Hospital and its emergency room staff.
34. A copy of any in-service training provided by Plantation General Hospital to Victoria Aquino Camba, D.O. relating to the care and treatment of the obstetrical emergency patient from 2000 through 2005.
35. A copy of any in-service training provided by Plantation General Hospital to Dario Dahy Altamirano, D.O. relating to the care and treatment of the obstetrical emergency patient from 2000 through 2005.
36. A copy of the job description for the emergency room physician in effect at Plantation General Hospital in 2004 and 2005.
37. A list of all persons who served on the emergency room peer review committee in 2005.
38. A list of all personnel in the emergency room on 5/15/05 at the time that Raquel White received care and treatment. This was to include ALL personnel, not just emergency room personnel. Please provide their last known address or sufficient information to obtain a subpoena for deposition and if still employed by Plantation General Hospital, please so indicate.
39. A copy of any standards and/or guidelines and/or policies and procedures you believe

apply to the care and treatment of the emergency room patient who presents to the emergency room pregnant with eclampsia in effect at Plantation General Hospital in 2004 and 2005.

40. A copy of any and/or guidelines and/or policies and procedures you believe apply to the care and treatment of the emergency room patient who presents to the emergency room pregnant with abruption in effect at Plantation General Hospital in 2004 and 2005.

41. A copy of the Index and/or Table of Contents from Plantation General Hospital Patient Care Policy and Procedure Manual for the Emergency Room in effect in 2005.

42. A copy of the Index and/or Table of Contents from Plantation General Hospital Patient Care Policy and Procedure Manual for the Obstetrical Unit in effect in 2005.

43. A list of all persons and last known addresses you believe are witnesses to conversations between Raquel White and Maisonel Jean as it relates to Raquel White's hospitalization.

44. A copy of the corporate structure for Plantation General Hospital in effect in 2004 and 2005.

45. A copy of the emergency room staffing schedule in effect at Plantation General Hospital on May 15, 2005.

46. A copy of the obstetrical staffing schedule in effect at Plantation General Hospital on May 15, 2005.

47. A copy of the job description for the obstetrical nurse covering the emergency room in effect at Plantation General Hospital in May of 2005.

48. A copy of Plantation General Hospital's Mission Statement in effect in 2004 and 2005.

49. A copy of all quality management policies and procedures in effect at Plantation General Hospital in 2005.

50. A copy of all policies and procedures in effect in 2004-2005 relating to termination of staff privileges of doctors at Plantation General Hospital.

51. A copy of all quality management policies and procedures in effect for 2004 to 2005, including but not limited to the following:

- a. Internal Review Board (IRB) Guidance Policy
- b. IRB protocol initially continuing review.
- c. Informed Consent IRB review.
- d. Adverse event review.

52. A copy of all medical bills generated by Plantation General Hospital for care and treatment rendered to Raquel White and Maisonel Jean.

53. A laser color copy of the medical record of Raquel White and Emmanuel Jean.

54. A laser color copy of all fetal monitoring strips of Raquel White while a patient at Plantation General Hospital.

55. A copy of all documents, applications, certifications, surveys, inspections or the like for or by the Joint Commission on Accreditation of Health Care Organization for the last three (3) years, 2003 through 2006, including, but not limited to Notices of Non-Compliance, Deficiencies or Violations.

56. A copy of the Labor and Delivery Policies and Procedures in effect in May, 2005.

57. A copy of the Admission Policies and Procedures for the Emergency Room for the pregnant patient in effect in May, 2005.
58. A copy of the call schedule in effect on May 15, 2005 for the Obstetrical Department.
59. A copy of the maternity chain of command in effect on May 15, 2005 for the Obstetrical Department.
60. A copy of the chain of command for the Emergency Room Department in effect in May, 2005.
61. A copy of the electronic fetal monitoring policy and procedure in effect for the Obstetrical Unit in May, 2005.
62. A copy of the electronic fetal monitoring policy and procedure in effect for the Emergency Room in May, 2005.
63. A copy of the fetal monitoring priority policy and procedure in effect in May, 2005 for the Obstetrical Unit.
64. A copy of the guidelines for high risk delivery in effect in May, 2005 for the Obstetrical Department.
65. A copy of any guidelines for high risk delivery in effect in May 2005 for the Emergency Room.
66. A copy of the neonatal consult policy and procedure in effect for the Obstetrical Unit in May, 2005.
67. A copy of the notification of obstetrician policy in effect for the Obstetrical Department

in May, 2005.

68. A copy of the Obstetrical Admission Assessment/ Use policy and procedure in effect

in May, 2005.

69. A copy of physician back up policy and procedure in effect for the Obstetrical Unit in

May, 2005.

70. A copy of the physician back up policy and procedure in effect for the Emergency

Room in May, 2005.

71. A copy of any eclampsia policy and procedure in effect for the Obstetrical Unit in May

2005.

72. A copy of any eclampsia policy and procedure in effect for the Emergency Room

Department in May 2005

73. A copy of all of the required qualifications for nurses for labor and delivery in effect

in May, 2005.

74. A copy of the standards of care in practice in effect for the Obstetrical Unit in May,

2005.

75. A copy of the standards of care in practice in effect for the Emergency Room in May,

2005.

76. A copy of any policy and procedure related to emergency c-section in effect for the

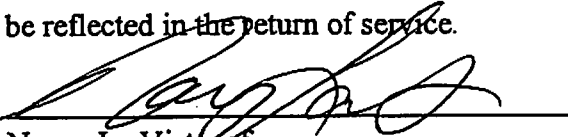
Obstetrical Unit in May, 2005.

77. A copy of any contract between Plantation General Hospital and All About Staffing in

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effect in May, 2005.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon
Plantation General Hospital, which date shall be reflected in the return of service.



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