IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY FIRST JUDICIAL DISTRICT OF PENNSYLVANIA CIVIL TRIAL DIVISION COMPLEX LIT. CENTER

JIIN 15 2009

BELUAH BEAVER, by and through : KATHERINE MARIE CHAVIS, as : Power of Attorney, :

Plaintiff,

v.

GENESIS HEALTHCARE CORP., et al.,

Defendants.

L. RYANT-DAVIS

COURT OF COMMON PLEAS PHILADELPHIA COUNTY

FEBRUARY TERM, 2008

NO. 0144 PURSUANT TO PA.R.C.P. 236(b)

JUN 17 2009

FIRST JUDICIAL DISTRICT OF PA USER I.D.:

ORDER

AND NOW, this day of the , 2009, upon consideration of the plaintiff's motion to compel discovery, the defendants' response thereto, and the recommendation of the Discovery Master after a discovery conference, it is hereby ORDERED that the defendants shall produce the following documents by June 25, 2009:

- 1. By agreement of the parties, documents responsive to requests numbers 17 through 19.
- 2. By agreement of the parties, in response to request number 31, all daily staffing sheets and all weekly work schedules for the entire facility from July 31, 2003 to February 4, 2008 and all timecards for caregivers and floor nurses for the floor of Beaver for the period of residency.

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- 3. By agreement of the parties, for requests numbers 34 through 42, the following documents for all deponents and all primary caregivers regularly assigned to the floor of Beaver for February 4, 2005 through February 4, 2008:
 - a. Applications for employment
 - b. Criminal background checks
 - c. Licensing and certification documents
 - d. Disciplinary actions
 - e. Performance evaluations
 - f. Exit interviews and forms
 - g. Resignation letters
 - h. Termination letters

Defendants shall provide a description of information redacted in accordance with statutory requirements, and the plaintiff shall not disclose or disseminate the documents produced except for the purposes of this and related litigation.

- 4. By agreement of the parties, for requests number 53 through 55, the following documents:
 - a. Applications for employment
 - b. Criminal background checks
 - c. Licensing and certification documents
 - d. Disciplinary actions
 - e. Performance evaluations

- f. Exit interviews and forms
- g. Resignation letters
- h. Termination letters

Defendants shall provide a description of information redacted in accordance with statutory requirements, and the plaintiff shall not disclose or disseminate the documents produced except for the purposes of this and related litigation.

5. Defendants do not waive any objections to the admissibility of these documents at trial.

BY THE COURT:

Sandra Mazer Moss, J