

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
CIVIL TRIAL DIVISION

FRED T. BERNARD, III,  
Administrator of the Estate of  
FRED BERNARD, JR., deceased,

Plaintiff,

v.

BALA NURSING & RETIREMENT  
CENTER, BALA NURSING &  
RETIREMENT CENTER, LIMITED  
PARTNERSHIP, FORD ROAD  
CORPORATION, and MDC ASSET  
MANAGEMENT CORPORATION

Defendants.

*[Signature]*  
FEBRUARY TERM, 2008

No. 147

DOCKETED  
COMPLEX LIT. CENTER

SEP 2 - 2009

L. RYANT-DAVIS

COPIES SENT  
PURSUANT TO Pa.R.C.P. 236(b)

SEP 2 - 2009

FIRST JUDICIAL DISTRICT OF PA  
USER I.D.: \_\_\_\_\_

ORDER

AND NOW, this *31st* day of *Aug.*, 2009, upon consideration of defendants' motion to compel discovery, plaintiff's response thereto, and the recommendation of the Discovery Master, it is hereby ORDERED that the motion is GRANTED and plaintiff shall, within twenty (20) days of the date of this order:

1. Provide full and complete supplemental answers to Defendants' Supplemental Interrogatories and Requests for Production of Documents. Plaintiff shall provide a detailed privilege log as to all documents withheld on the basis of privilege or work product.



2. Provide full and complete supplemental answers to Interrogatories numbers 19, 28, 29, 30 (a)-(d), and 59, and Requests for Production numbers 2, 3, 5, 14, 19, 22 and 23.
3. Identify and produce for deposition Alex Soutos and William Egenlauf, and any other investigators or "trial assistants" who have researched or contacted former employees of Defendants in connection with this litigation.
4. Produce a copy of any and all notes, including interview notes created by agents, employees, investigators, or "trial assistants" who have researched or contacted former employees of Defendants in connection with this litigation. If any portions are redacted, a detailed privilege log must be provided.
5. For each former employee interviewed by plaintiff or any of his private investigators, plaintiff shall identify their full name, address, and shall specify the subject matter about which the witness had knowledge.
6. Plaintiff shall have a continuing obligation to supplement the names, addresses, and other information learned from witnesses within ten (10) days of receiving said information in the course of his ongoing investigation from now until the time of trial.
7. If plaintiff fails to comply with this Court Order, defendant may request sanctions upon application to the Court. To the extent that plaintiff's investigation is in ongoing and continuing in nature, plaintiff is

under a continuing obligation by Order of this Court to produce such documents and information within ten (10) days of receipt.

BY THE COURT:

  
Sandra Mazer Moss, J.