

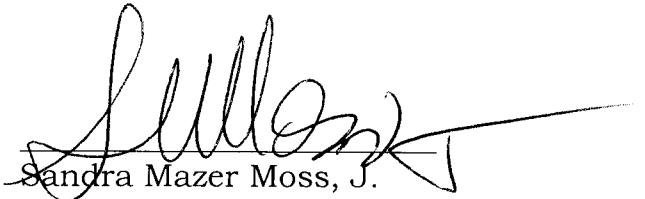
2. Upon good cause shown, in response to requests number 34 through 42, documents requested for CNAs assigned to McCarthy, and LPNs and unit managers assigned for the unit of McCarthy for the period of residency. Plaintiff may identify additional caregivers implicated in claims of injury in the case by August 5, 2009, and defendants shall produce the requested documents as to those individuals within twenty (20) days. For documents as to which defendants claim privilege, defendants shall produce a privilege and redaction log, and shall produce unredacted and redacted documents for an in camera inspection. 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.

3. Upon good cause shown, for requests number 54 through 56, 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.

BY THE COURT:



Sandra Mazer Moss, J.

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July 31, 2009

HAND DELIVERED

Hon. Sandra Mazer Moss
Room 392, City Hall
Philadelphia, PA 19107

Re: McCarthy v. Genesis Healthcare Corporation, et al.
February Term 2008, No. 3459

Dear Judge Moss:

Enclosed are copies of plaintiff's motion to compel discovery and defendants' response, along with a proposed order that addresses all issues except the discovery of documents "similar incidents" presented by interrogatory number 6. The following is a summary of the issues, all of which have been addressed in similar orders in other cases.

1. Request number 31. The parties agreed on the production of daily staffing sheets, weekly work schedules and timecards.
2. Request numbers 34-42. These involve certain personnel files and related documents for caregivers of the plaintiff.
3. Interrogatories 54-56. Personnel records for the administrator,

*Recommends the first flagged order
("Discovery master order").*

*Andrew
Please ask her for
a recommended
order*

Hon. Sandra Mazer Moss
July 31, 2009
Page 2 of 2

director of nursing, and assistant director of nursing.

Please feel free to contact me if Your Honor has any questions.

Respectfully,



Gilda L. Kramer

GLK/rj
Enclosures