



b. Number 10 (related to reports by consultants, subject to claims of privilege, to be set forth in a privilege log)

c. Number 19, documents pertaining to "level of care determinations."

d. Documents responsive to numbers 28 and 29 (e.g., sign in sheets, timecards) for three months prior to January 17, 2007.

3. With respect to request for production of documents set II:

a. Numbers 1 through 4, provide the index to 2006 P&P manual.

b. Number 14 and 16 complaints from other suits, and list of lawsuits limited to this facility and similar claims.

c. Number 21, documents limited to pre-suit settlements involving this facility and similar claims.

d. Number 22, in service schedules for 2006 and 2007.

e. Number 28, limited to abuse, neglect, dehydration, malnutrition, falls, toileting, incontinence care, alarms, following physicians' orders, incident reports, and documentation in resident chart.

4. With respect to request for production of documents, set III, defendants shall supplement their responses as follows:

a. Number 5, produce billing records.

b. Number 7, produce any billing not on billing records.

c. Numbers 15-18, produce signed plans of correction from December 9, 2005 through January 17, 2007.

d. Number 20, resident complaints from December 9, 2005 through January 17, 2007 limited to abuse, neglect, dehydration, malnutrition, falls, toileting, incontinence care, alarms, inadequate staff, inadequate supervision.

e. Numbers 22 (studies/audits of staffing) and 24 (documentation pertaining to staff turnover), if they exist.

f. Correspondence to or from the Department of Health from December 9, 2005 through January 17, 2007 pertaining to abuse, neglect, falls, dehydration, malnutrition, failure to assess, failure to supervise, failure to toilet, failure to treat.

g. Numbers 34 through 40 (warning letters, notices from state and local government agencies from December 9, 2005 through January 17, 2007, and pertaining to abuse, neglect, falls, dehydration, malnutrition, failure to assess, failure to supervise, failure to toilet, and failure to treat and limited to the facility).

h. Number 41, studies and analyses regarding occurrences (i.e., deaths, serious injuries) from December 9, 2005 through January 17, 2007.

i. Number 42, fines by agencies from December 9, 2005 through January 17, 2007, limited to abuse, neglect, falls, dehydration,

malnutrition, failure to assess, failure to supervise, failure to toilet, and failure to treat.

j. Number 43, indictments and judgments from December 9, 2005 through January 17, 2007 pertaining to abuse, neglect, falls, dehydration, malnutrition, failure to assess, failure to supervise, failure to toilet, and failure to treat.

k. The following documents for Veronica Lyons, Kim King, Janna Bryant and Nathaniel Glenn:

- 1) Applications for employment
- 2) Criminal background checks
- 3) Licensing and certification documents
- 4) Disciplinary actions
- 5) Performance evaluations
- 6) Exit interviews and forms
- 7) Resignation letters
- 8) 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.

