

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

Williams Vs Willow Terrace Etal-ORDER

CAMAY E. WILLIAMS, :  
Administratrix of the Estate of :  
MARCEL MACKEY, SR., Deceased, :  
:  
Plaintiffs, :  
:  
v. :  
:  
WILLOW TERRACE, *et al.* :  
:  
Defendants. :



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COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

MARCH TERM, 2009

No. 003774

ORDER

AND NOW, this *7th* day of *April*, 2010, upon consideration of

plaintiff's motion to compel discovery by St. Agnes Continuing Care Center, the defendant's response thereto, and the recommendation of the Discovery Master after a discovery conference, it is hereby ORDERED that the motion is GRANTED in part and DENIED in part as follows:

1. Upon good cause shown, defendants shall, within ten (10) days of the date of this order, produce the following documents responsive to plaintiff's request for production of documents numbers 35-37 and 39-42 for deponents, plaintiff's primary caregivers, and individuals specifically identified as involved in discreet incidents of alleged negligence:

- a. Applications for employment
- b. Criminal background checks
- c. Licensing and certification documents

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COMPLEX LIT. CENTER

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- 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.

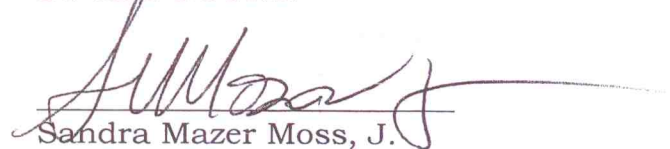
For the purposes of this order, plaintiff's primary caregivers and deponents include the following individuals:

- a. Denise D'Adamo
- b. Nicole Brown
- c. Anayn Trinidad
- d. Mary C.S.
- e. L. H.
- f. N. Inelege
- g. Beverly Smith
- h. Teddy Pamid
- i. Gloria Rasando
- j. Fran Rosenberg
- k. Lisa Cotterall
- l. Susan Simeone

Defendants shall promptly cooperate with plaintiff to identify these individuals.

2. In response to request number 38, defendants shall produce the requested documents for the period November 11, 2006 to May 11, 2007 related to plaintiff, limited to complaints by the individuals identified in paragraph 1 of this order, based upon defendants' representation that all complaints are contained only in personnel files. Defendants shall also produce documents related to complaints by the individuals identified in paragraph 1 of this order as to other residents, limited to complaints about infections, sacral ulcers, dehydration and staffing at or below the minimum required by the Commonwealth of Pennsylvania. Defendants shall include the residents' year of birth, but redact names, dates of birth, room numbers, social security numbers, addresses, and other information as statutorily required. 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. Plaintiff, after reviewing the documents ordered to be produced and upon further good cause shown, may seek additional documents.

BY THE COURT:

  
Sandra Mazer Moss, J.