

ATTACHMENT 1

You are commanded to produce and permit inspection and copying of the following documents, including but not limited to documents which are retained in paper, electronically stored, preserved in microfiche, etc.

No. 1: Produce any and all documents LVN Laura Adair was required to sign per CDCR protocols, Page 1-8-3, implementation and review of health care policies and procedures manual.

No. 2: Produce any and all case study analyses, written examinations, and/or return demonstrations documenting LVN Laura Adair's ongoing evaluation pertaining to CDCR Protocol page 5-8c-2(3) - gastrointestinal system, gastrointestinal bleeding, health care services.

No. 3: Produce any and all lists or documents that state LVN Laura Adair is authorized to perform the assessment and treatment of patients presenting with rectal peri-anal complaints, gastrointestinal system, health care services, page 5-8c-3.

No. 4: Produce any and all case study analyses, written examinations, and/or return demonstrations documenting LVN Laura Adair's ongoing evaluation pertaining to CDCR Protocol: rectal peri-anal complaints, gastrointestinal system, health care services.

No. 5: Produce any and all written performance appraisals for the following health care services Protocols LVN Laura Adair was validated for:
a) gastrontestinal system, rectal peri-anal complaints, health care services, page 5-8c-3
b) Gastrointestinal system, gastrointestinal bleeding, health care services, page 5-8b-3

No. 6: Produce any and all documents of the review done on LVN Laura Adair by the senior registered nurse concerning LVN Adair's use of approved Protocols, health care services, as stated on page 5-1-2, nursing program overview.

No. 7: Produce any and all documents showing where LVN Adair worked on 1-2-10.

No. 8: Provide any and all performance reviews for LVN Laura Adair of the nursing Protocols that relate to her position as a nurse while employed at S.A.T.F. Corcoran Prison between 1-1-10 through 7-7-11 that is contained in her employee file or staff development training file.

No. 9: Provide any and all documents LVN Laura Adair was given as a training or learning aid when LVN Laura Adair was trained in the policies and procedures to be taken when an inmate presents himself to a nurse complaining of bleeding per HCS Protocols page 5-1-1 to 5-1-2.

No.10: Provide any and all documents concerning LVN Laura Adair's 'competency and training records' that shall be maintained in the proof of practice binder per page 5-1-2, nursing program overview, HCS protocols.

1 No. 11: Provide any and all documents showing the Protocols LVN Laura Adair
2 must follow that describe the criteria for a physician referral when an inmate
presents/complains to a nurse of:

- 3 a) gastrointestinal bleeding
- 4 b) rectal peri-anal complaints
- 5 c) bleeding
- 6 d) pain

7 No. 12: Produce any documents that list the personnel or staff complaints filed
8 against LVN Laura Adair from 1-1-10 to 7-7-11.

9 No. 13: Redact any sensitive information concerning LVN Laura Adair's address,
10 social security number, home phone number, and Birth date.
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