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March 24, 2006

THOMAS L. SCHIEFFELIN, JR.

Via Facsimile and U.S. Mail

Andrea L. Hairelson, Esquire
 Mac A. Greco, Jr., P.A.
 600 Madison Street
 Tampa, Florida 33602-4037

Re: Lattner v. West Orange Health Care District, d/b/a Health Central
 Our File No.: 38.1881

Dear Andrea:

In follow-up to a couple of issues communicated to me through Betty, please be advised of the following. First, at this point in time, the hospital has been unable to locate ED patient logs from April 2002 in order to identify the patients whose records would fall within the ambit of your requested discovery. I am told that back in April 2002, this information was not computerized but was kept manually and would have been destroyed in the normal course of business. There is a possibility that some of these logs were unintentionally not destroyed and the hospital is searching off-site locations to pursue this possibility. I am advised they have already spent a substantial number of hours in attempting to retrieve the records in order to estimate the time, expense, etc. associated with retrieval, copying and redaction. I am merely bring you up to speed to let you know that your request is not being ignored, however, I also understand that without retrieval of these logs, it would be impossible to identify patients who would have emergency department records for this specific period of time.

Regarding the follow-up inquiries pertaining to the hospital personnel from whom you have requested depositions, please be advised that Robert Stein, Paulette Morrison and Joel Nicolo are the current Director of Emergency Department, Assistant Director and Nursing Supervisor in the emergency department, respectively. These were being provided pursuant to your specific requests for those positions. It was also believed that they would have been available to answer questions regarding policy and procedures and staffing in the emergency department, however, none of them



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were employed at Health Central at the time of Mr. Lattner's care. Indeed, none of the individuals in supervisory positions with knowledge about then-existing policies and procedures are still employed by Health Central. Consequently, the hospital does not currently have any individual with direct knowledge of those issues at the time in question, however, we believe the person with the "most" knowledge regarding these issues would be Robert Stein. You may wish to consider taking his deposition first and then deciding whether you have a need for any additional depositions. I certainly do remain open to any alternative suggestions or approaches you may have in mind.

Very truly yours,



Thomas L. Schieffelin

TLS/btm