

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
OCALA DIVISION

UNITED STATES OF AMERICA,  
ex rel. KARYN L. DENK-WALKER,

Plaintiff,

v.

Case No.: 5-02-cv-131-Oc-10GRJ

LEESBURG FAMILY MEDICINE, P.A.,

Defendant.

\_\_\_\_\_/

**DEFENDANT'S RESPONSE TO PLAINTIFF'S  
FIRST REQUEST FOR ADMISSIONS**

The Defendant, R & F Properties of Lake County, Inc., f/k/a Leesburg Family Medicine, P.A. ("LFM"), by its undersigned attorneys, responds to the first request for admissions served by the Plaintiff, Karyn L. Denk-Walker ("Denk-Walker"), on October 10, 2003, as follows:

**General Objection**

LFM objects to the "relevant time period" set forth in the request because it exceeds the permissible scope of discovery set forth in the Court's October 28, 2003, order.

**Specific Responses**

1. Admitted that LFM possesses records of the claims it submitted to Medicare. During the time period of Plaintiff's employment with LFM, LFM submitted claims to Medicare electronically.



2. Denied.

3. Admitted that LFM possesses records of the claims it submitted to Medicare. During the time period of Plaintiff's employment with LFM, LFM submitted claims to Medicare electronically.

4. Denied.

5. Admitted that upon information and belief, the Plaintiff did not obtain her own Medicare provider number during the time she was employed by LFM.

6. Denied that LFM had a practice as described.

7. Denied that LFM had a practice as described.

8. Denied that LFM had a practice as described.

9. Admitted that Gail Mayer possessed some knowledge of LFM's Medicare billing practices during the time Plaintiff was employed by LFM.

10. Denied.

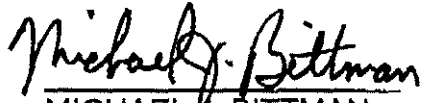
11. LFM lacks information and knowledge about what Gail Mayer informed Plaintiff. LFM has made a reasonable inquiry, and the information known or readily obtainable is insufficient to enable LFM to admit or deny. LFM agrees to make Gail Mayer available for deposition so the Plaintiff can question her on this subject.

12. Denied.

13. Denied.

DATED: November 12, 2003.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

*I HEREBY CERTIFY* that a true and correct copy of the foregoing was furnished  
by United States Mail this 12th day of November, 2003, to:

BERNARD H. DEMPSEY, JR., ESQ.  
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