

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 SUPPLEMENTAL RESPONSE TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

The Defendant, R & F Properties of Lake County, Inc., f/k/a Leesburg Family Medicine, P.A. ("LFM"), by its undersigned attorneys, supplements its response to the first request for production of documents served by the Plaintiff, Karyn L. Denk-Walker ("Denk-Walker"), on August 25, 2003, as follows:

Without waiving any objection, privilege, or right, LFM furnishes the following documents:

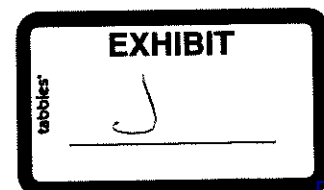
1. **Organizational documents**

Documents relating to LFM's name change and its current articles of incorporation are attached (000001-000005).

2. **Organizational structure and employee composition**

A list of the names and last known addresses and telephone numbers (if available) of all employees who worked at LFM in May 1999 (when Ms. Denk-Walker's employment was terminated) is attached (000098-000100).

3. **Ms. Denk-Walker's personnel file and work schedules**



Ms. Denk-Walker's personnel file is attached (000007-000097). Monthly calendars of her work schedules are attached (000140-000167).

4. **List of LFM personnel**

A list of the names and last known addresses and telephone numbers (if available) of all employees who worked at LFM in May 1999 (when Ms. Denk-Walker's employment was terminated) is attached (000098-000100).

5. **Job descriptions**

Job descriptions are attached (0000101-000138).

6. **Personnel schedules**

Monthly calendars of Ms. Denk-Walker's work schedules are attached (000140-000167).

7. **Employment contracts**

The employment contracts between LFM and Ms. Denk-Walker. are contained in her personnel file.

DATED: October 20, 2003.

Respectfully submitted,



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Co-Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished
this 20th day of October 2003 as follows:

VIA HAND DELIVERY WITH
ATTACHED DOCUMENTS TO:

BERNARD H. DEMPSEY, JR., ESQ.
Dempsey & Sasso
390 N. Orange Avenue
Suite 2700
Orlando, FL 32801-1673

VIA UNITED STATES MAIL WITHOUT
ATTACHED DOCUMENTS TO:

PAUL I. PEREZ, ESQ.
RONNIE S. CARTER, ESQ.
Office of the U.S. Attorney
United States Courthouse
300 North Hogan Street
Suite 700
Jacksonville, FL 32202-4270


MICHAEL J. BITTMAN