

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

10-cv-6005 (RWS)

Plaintiff,

-against-

**Notice of
Depositions**

THE CITY OF NEW YORK, et al,

Defendants.
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Please take notice that the pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure the plaintiff will be taking on May 30, 2014 at 10:00 am the depositions of Defendant Jamaica Hospital Medical Center (JHMC"), by stenographic, video and audio-recorded means on the following subject matters:

- (a) The policies, procedures, and practices of JHMC regarding the evaluation of the performance of psychiatrists working at JHMC;
- (b) The performance factors, elements of evaluation, ranking or scoring protocols, and the considerations involved in the review and evaluation of the performance of psychiatrists working at JHMC;
- (c) The officials who are responsible for performing, reviewing and/or approving the performance evaluations of psychiatrists working at JHMC.
- (d) The policies, procedures, and practices of JHMC regarding the decision to admit or hold patients involuntarily under the New York State Mental

Hygiene Law and the creation of any documentation regarding that decision as required by law or by the policies, procedures or practices of JHMC;

(e) statistics for the period from January 1, 2003 through December 31, 2009 regarding (1) the average stay of a patient involuntarily admitted to JHMC under the New York State Mental Hygiene Law; (2) the total and average revenues received by JHMC for patients involuntarily admitted to JHMC under the New York State Mental Hygiene Law; (3) the source or sources, including governmental agencies, private parties, insurance or other such sources, of the revenue received by JHMC for patients involuntarily admitted to JHMC under the New York State Mental Hygiene Law; and (4) the number of patients involuntarily admitted to JHMC who do not have any kind of insurance or other ability to pay.

(f) the availability of insurance or coverage or reimbursement for medical, psychiatric, and other expenses for Adrian Schoolcraft for all or part of the period of time from October 31, 2009 through November 6, 2009;

(g) the rules, practices and policies for psychiatric patients at JHMC who want to vote in a public election while being involuntarily admitted at JHMC;

(h) the security systems in place on the psychiatric wards of JHMC in November of 2009;

(i) the difference, if any, between or among the various psychiatric wards at JHMC in November of 2009;

(j) the relationship, if any, between JHMC and (1) Seeth Vivek; and/or (2) Steven A. Luel; and/or (3) Shirley Huntley.

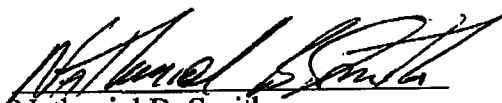
(k) the relationship, if any, between any security personnel, social worker, nurse or doctor working at JHMC in 2008 or 2009 and any former or active member of service of the NYPD;

(l) the corporate or organizational structure of JHMC, including knowledge of its purposes, mission statement, charter, articles of incorporation, by-laws, and constitution;

(m) the revenues and costs associated with the involuntary commitment of patients at JHMC for the period of time from 2000 through 2010 and the sources and relative and percentage of all revenues;

(n) the overall financial operations of JHMC for the period from 2000 through 2010, including the breakdown of costs and revenues in accordance with the accountant principles used and applied in JHMC's financial statements.

You are invited to attend and cross-examine. The deposition shall proceed from day to day until completed.



Nathaniel B. Smith
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Dated: New York, New York
March 28, 2014