

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAN HEGGS,

Plaintiff,

-against-

THE CITY OF NEW YORK, NEW YORK CITY
HEALTH AND HOSPITALS CORPORATION,
CORIZON, INC., CORIZON HEALTH, INC.,
CORIZON HEALTH CLINICAL SOLUTIONS, LLC,
CORRECTIONAL MEDICAL ASSOCIATES OF
NEW YORK, P.C., DR. RAUL RAMOS, RODERICK
WILLIAMS, DR. HOMER VENTERS, DR. JAY
COWAN, DR. ROSS MCDONALD, DR. FRANKLIN
MEJIA, DR. KATZ, NINA EDWARDS, ASSISTANT
DEPUTY WARDEN LILLIAN BENBOW, WARDEN
CAROLYN SAUNDERS, C.O. CARLOS SANCHEZ,
OFFICER C.O. DAIN DEALLIE, C.O. JERMAIN
PHILLIPS, CAPTAIN JASON FERNANDEZ,
MEDICAL DOES 1 —7, C.O. DOES 1 —7,

Defendants.

**MOTION TO SUBSTITUTE
ESTATE OF DEFENDANT
DR. RAUL RAMOS
PURSUANT TO RULE 25**

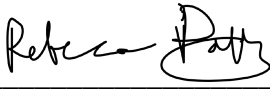
No. 18 Civ. 9709 (RA) (RWL)

PLEASE TAKE NOTICE, that upon the Declaration of Rebecca L. Pattiz, dated April 23, 2021, and upon all the papers and proceedings had herein, Plaintiff Milan Heggs will move this Court, before the Honorable Ronnie Abrams, at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, on a date and at a time to be designated by the Court, for an Order:

- 1) Substituting Nicole Ramos as Administratrix of the Estate of Dr. Raul Ramos, deceased, as a Defendant in this action;
- 2) Amending the caption to reflect the same; and
- 3) Such further relief as the Court may deem just and proper.

Dated: New York, New York
April 23, 2021

Respectfully submitted,

By: 

Rebecca L. Pattiz
Beldock Levine & Hoffman LLP
Attorneys for Plaintiff
99 Park Avenue, PH/26th Floor
New York, New York 10016
P: 212-490-0400
E: rpattiz@blhny.com

Application granted

SO ORDERED.



Hon. Ronnie Abrams
April 27, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAN HEGGS,

Plaintiff,

-against-

THE CITY OF NEW YORK, NEW YORK CITY HEALTH AND HOSPITALS CORPORATION, CORIZON, INC., CORIZON HEALTH, INC., CORIZON HEALTH CLINICAL SOLUTIONS, LLC, CORRECTIONAL MEDICAL ASSOCIATES OF NEW YORK, P.C., DR. RAUL RAMOS, RODERICK WILLIAMS, DR. HOMER VENTERS, DR. JAY COWAN, DR. ROSS MCDONALD, DR. FRANKLIN MEJIA, DR. KATZ, NINA EDWARDS, ASSISTANT DEPUTY WARDEN LILLIAN BENBOW, WARDEN CAROLYN SAUNDERS, C.O. CARLOS SANCHEZ, OFFICER C.O. DAIN DEALLIE, C.O. JERMAIN PHILLIPS, CAPTAIN JASON FERNANDEZ, MEDICAL DOES 1 Ø7, C.O. DOES 1 Ø7,

Defendants.

**DECLARATION OF
REBECCA L. PATTIZ
IN SUPPORT OF MOTION TO
SUBSTITUTE ESTATE OF
DEFENDANT DR. RAUL RAMOS**

No. 18 Civ. 9709 (RA) (RWL)

I, Rebecca L. Pattiz, pursuant to 28 U.S.C. § 1746, do hereby declare under penalties of perjury:

1. I am an associate at the law firm Beldock Levine & Hoffman, LLP, attorneys for the Plaintiff in the above captioned action.
2. I respectfully move this court for an Order pursuant to Federal Rule of Civil Procedure 25(a) substituting the estate of Defendant Dr. Raul Ramos as a defendant in this action.

3. Plaintiff's counsel was notified of the death of Dr. Ramos on January 27, 2021. See Notice of Suggestion of Death, ECF No. 88. Fewer than 90 days have passed since the Notice of Suggestion of Death was filed.


4. On April 14, 2021, I called Dr. Ramos's wife, Nicole Ramos, at telephone number provided by Defendant's counsel. She confirmed that she is the administrator of his estate.

5. Pursuant to Rule 25(a) of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant Dr. Raul Ramos be replaced with Nicole Ramos, as Administratrix of the Estate of Dr. Raul Ramos, Deceased, so that Plaintiff's claims are not extinguished.

6. Defendants consent to this request.

Dated: New York, New York
April 23, 2021

Respectfully submitted,

By: 

Rebecca L. Pattiz
Beldock Levine & Hoffman LLP
Attorneys for Plaintiff
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