

Attorney Number: 39224 nof

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

JESUS VILLANUEVA

Plaintiff,

v.

**HIGHLANDER CARE CENTER, LLC, d/b/a
INTERNATIONAL VILLAGE, LLC**

Defendant.

No. 08 L 11848

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

NOW COMES, the Plaintiff, JESUS VILLANEUVA, by and through his attorneys Strellis & Field, Chartered, and propounds the following Request for Production of Documents pursuant to Rule 214, to be answered in 28 days.

1. All original records relating to JESUS VILLANEUVA including, but not limited to:
 - (a) Admission/Discharge Records-transfer forms, discharge summaries, initial assessments, histories and physicals, physicians' orders at admission and upon discharge;
 - (b) Medication Records- telephone order slips, physician order sheets, medication administration records, PRN administration records, pharmacy order sheets;
 - (c) Physician's Records- progress notes, exams, physicals, written orders of attending physicians and specialists including, but not limited to, podiatrists, dentists and psychiatrists;
 - (d) Nursing Records- assessments (falls, skin, nutritional needs, care needs, other risks), Minimum Data Sets (MDS) and updates, RAPs, progress notes, care plans and updates, incident reports;
 - (e) Dietary Records- initial diet orders, diet/nutritional assessments, on-going dietary orders, intake and output records, dietary progress notes;

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- (f) Activities/Social Services- histories and assessments, care plans, progress notes;
- (g) Rehabilitation/Therapy Records- orders, evaluations, care plans, progress notes;
- (h) Legal Records- notice of guardianship appointment, advance directives

2. All policies and procedures in effect August 27, 2003 through March 11, 2008 regarding:

- (a) Admission, assessment and initial treatment/care plans and corresponding documentation for newly admitted or readmitted residents;
- (b) obtaining, documenting, and carrying out physicians' orders for treatment including, but not limited to orders upon readmission from another health care facility;
- (c) emergency medical conditions, including but not limited to, traumatic injuries;
- (d) observing, documenting and reporting the condition of a resident;
- (e) documenting, treatment and response to treatment of circulatory conditions and skin conditions including, but not limited to, pressure sores, wound infections, discolored extremities, incisions and lacerations, extremity edema and temperature changes in extremities;
- (f) securing the cooperation of residents' physicians;
- (g) transfer of a resident from the nursing home to a hospital for evaluation and /or treatment;
- (h) the development, updates and revisions of care plans including, but not limited to, notification of resident and family regarding care plan conferences(s);
- (i) the facility's infection control program;
- (j) the facility's restorative/rehabilitative nursing program;
- (k) all policies relating to changing and maintenance of urinary catheters.

3. All reports made by facility personnel in regard to the nutritional and fluid intake of JESUS VILLANEUVA.
4. All photographs, slides, video tapes or motion pictures taken of JESUS VILLANEUVA taken prior and subsequent to his admission / discharge at your facility.
5. All statements of any party to some person or entity other than it's attorney or insurer.
6. The written description of the services provided by the facility and the rates charged for those services and items which a resident may be separately charged, effective through
7. A complete copy of promotional materials used for admission and orientation including, but not limited to brochures, summary of residents' rights, rates schedules, services available, responsibilities of residents and facility, and advance directive information.
8. All documents including, but not limited to, staffing, schedules, time cards, duty rosters, and other employment records which contain the employees' signatures and which indicate the employees assigned to and working on the floor, section, wing or unit of the facility in which JESUS VILLANEUVA resident from August 27, 2003 through March 11, 2008.
9. All schedules, lists and other documents regarding in-services provided staff, including but not limited to documents with the names, titles and dates, of staff attending such in-service programs regarding the following:
 - (a) care, treatment, maintenance and changing of urinary catheters;
 - (b) observing and documenting a resident's condition;
 - (c) reporting and documenting changes in a resident's condition, including but not limited to behavioral changes, deterioration, incidents, injuries and accidents;
 - (d) observing, assessing, documenting and reporting the status of a resident's circulation and vascular condition including, but not limited to peripheral pulses, edema in lower extremities and skin color changes in lower extremities.
10. Any correspondence, notes or other writings exchanged between the attorney for the defendant and any party concerning JESUS VILLANEUVA.

11. Any and all material, documents and any other information that each witness has been provided concerning the nature of this case.
12. All documents identified in answers to interrogatories.
13. An affidavit of the party indicating that production is complete and that all documents have been produced in response to this request.