

IN THE SIXTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA
IN AND FOR PINELLAS COUNTY, FLORIDA

JANINE BARNES
and JULIE FOURNIER,

Plaintiffs,

v.

CASE NO. 11-04262-CI-21

BAYSIDE ORTHOPAEDICS, INC.,

Defendant.

PLAINTIFFS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT

Pursuant to the Florida Rules of Civil Procedure, please produce the following electronically, either on CD, DVD, or USB drive. Please produce any hard copy document as a first generation 300 dpi or better scanned image file which may include bate stamps. Please produce any electronic files in their native file format unless such production is rendered impractical due to the need for redaction of work-product or attorney-client privileged information. In the event that the files are produced in a format other than their native format, please give written notice that such substitution has occurred as part of the privilege log. Please produce outlook e-mail and attachments as a PST file containing the relevant e-mail and attachments.

1. All correspondence generated between 1/1/2008 and present between DePuy Orthopaedics, Inc., its employees, and agents and Bayside Orthopaedics, Inc. its employees, or agents discussing agreements in effect between the companies.
2. For all records other than e-mail in the possession or control of Bayside Orthopaedics, Inc., its employees or agents, generated between 1/1/2008 and present discussing or relating to Plaintiffs' ASR Acetabular Implants, please provide an electronic copy that may be bate stamped, need not be in its native file format, and need not have all metadata intact.
3. All records in possession of Bayside Orthopaedics, Inc., its employees or agents, discussing, mentioning, or relating to Plaintiffs prior to receipt of the complaint in this matter by Bayside Orthopaedics, Inc., including correspondence with or between orthopedic surgeons, sales representatives, and employees of DePuy Orthopaedics, Inc.
4. All records in possession of Bayside Orthopaedics, Inc. or agents pertaining to invoices for devices implanted in Plaintiffs.

5. A roster of all employees and their positions and office locations of Bayside Orthopaedics, Inc. as of January 1, 2008.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served EDWARD GERECKE, ESQ., counsel for Defendants, at his office address of Carlton Fields, 4221 West Boy Scout Boulevard, Suite 1000, Tampa FL 33607, via regular mail, postage prepaid and via electronic communication (egerecke@carltonfields.com) this the 7th day of June, 2011.

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