

Steven A. Friedman, Esquire
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Dominic Morgan
Plaintiff

vs.

Herbert J. Nevyas, M.D., and
Joann Y. Nevyas, M.D., and
Anita Nevyas-Wallace, M.D., and
Ira B. Wallace, M.D., and
Edward A. Deglin, M.D., and
Mitchell Stein, M.D., and
Nevyas Eye Associates, P.C., and
Nevyas Eye Associates of New Jersey, P.C.
Defendants

: PHILADELPHIA COUNTY
: COURT OF COMMON PLEAS
: TRIAL DIVISION

:
: April 2000 Term, No.002621

PLAINTIFF'S FOURTH SET OF INTERROGATORIES
ADDRESSED TO Nevyas Eye Associates

TO: Nevyas Eye Associates

Plaintiff hereby demands that defendant answer the following interrogatories under oath within the time and in the manner provided by the Pennsylvania Rules of Civil Procedure.

These interrogatories are to be deemed continuing and any information secured subsequent to the filing of answers is to be supplied to Supplemental Answers.

The word "occurrence" used in the following interrogatories refers to those events alleged in plaintiff's Complaint which caused injury to the plaintiff.

The word "you" used in the following interrogatories refers not only to defendant as an individual but likewise to defendant's agents, representatives, attorneys and all other persons acting on behalf of defendant.

The singular includes the plural, and vice versa.

Complaint refers to the Complaint as amended.

Gender designation shall refer to masculine, feminine, or neutral, and not be otherwise restrictive.

For all questions which you cannot answer, state why not, and state where or from whom you have reason to believe the answer may be obtained, and the basis for your belief.