7/12/2023 4:44 PM Marilyn Burgess - District Clerk Harris County

Envelope No. 77464528

No. 2023-32561 By: Bralyn Medlock Filed: 7/12/2023 4:44 PM

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	Š	234TH JUDICIAL DISTRICT

NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

To Plaintiff by and through their attorney(s) of record: Tommy Hastings (Hastings Law Firm, P.C.) To other party/parties by and through their attorney(s) of record: Gerald E. Castillo (Serpe | Andrews, PLLC)

You will please take notice that twenty (20) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

City of Houston - EMS (EMS) 1801 Smith Street, Suite 860 Houston, TX 77002

City of Houston - EMS (Billing) 1801 Smith Street, Suite 860 Houston, TX 77002

Fondren Orthopedic Group (Medical) 7401 South Main Street Houston, TX 77030

Fondren Orthopedic Group (Billing) 7401 South Main Street Houston, TX 77030

Fondren Orthopedic Group (Radiology) 7401 South Main Street Houston, TX 77030

PAM Health Rehabilitation Hospital of Humble (Medical) 18839 McKay Dr Humble, TX 77338

PAM Health Rehabilitation Hospital of Humble (Billing) 18839 McKay Dr Humble, TX 77338

Better Life Spine & Pain Center (Medical) 12518 Cutten Rd Houston, TX 77066

Better Life Spine & Pain Center (Billing) 12518 Cutten Rd Houston, TX 77066

Zion Healthcare of Cypress (Medical) 10851 Crescent Moon Drive Houston, TX 77064

Zion Healthcare of Cypress (Billing) 10851 Crescent Moon Drive Houston, TX 77064

Premier General & Colorectal Surgery (Medical) 129 Vison Park Blvd., Suite 212 Conroe, TX 77384

Premier General & Colorectal Surgery (Billing) 129 Vison Park Blvd., Suite 212 Conroe, TX 77384

Modern Heart & Vascular (Medical & Radiology) 18980 N Memorial Dr, 100 Humble, TX 77338

Modern Heart & Vascular (Billing) 18980 N Memorial Dr, 100 Humble, TX 77338

Crimson Heights Health & Wellness (Medical & Radiology) 19279 McKay Dr. Humble, TX 77338

Crimson Heights Health & Wellness (Billing) 19279 McKay Dr. Humble, TX 77338

Memorial Hermann Health System (Medical) Release of Information 7737 SWF C94 Houston, TX 77074

Memorial Hermann Health System (Billing) Release of Information 7737 SWF C94 Houston, TX 77074

Memorial Hermann Health System (Radiology) Release of Information 7737 SWF C94 Houston, TX 77074

Texas ENT Specialists (Medical) 10740 N. Gessner Rd., Suite 310 Houston, TX 77064

Texas ENT Specialists (Billing) 10740 N. Gessner Rd., Suite 310 Houston, TX 77064

Texas ENT Specialists (Radiology) 10740 N. Gessner Rd., Suite 310 Houston, TX 77064 Strategic Wound Care (Medical) 700 E. Marshall Ave. Longview, TX 75601

Strategic Wound Care (Billing) 700 E. Marshall Ave. Longview, TX 75601

CHI St. Luke's Health - The Woodlands Hospital (Medical) Health Information Management 17200 St. Luke's Way, Suite 150 (Mail Code 7-204) The Woodlands, TX 77384

CHI St. Luke's Health - The Woodlands Hospital (Billing) Attn: Patient Financial Services 17200 St. Luke's Way The Woodlands, TX 77384

CHI St. Luke's Health - The Woodlands Hospital (Radiology) Radiology Department 17200 St. Luke's Way The Woodlands, TX 77384

Texas Surgical Dermatology (Medical) 21009 Kuykendahl Rd. Ste A Spring, TX 77379

Texas Surgical Dermatology (Billing) 21009 Kuykendahl Rd. Ste A Spring, TX 77379

IPR Healthcare System, Inc. (Medical) 1328 S. Loop W., Suite 100 Houston, TX 77054

IPR Healthcare System, Inc. (Billing) 1328 S. Loop W., Suite 100 Houston, TX 77054

Pinard Home Health (Medical) 17819 Stuebner Airline Rd., Suite F Spring, TX 77379

Pinard Home Health (Billing) 17819 Stuebner Airline Rd., Suite F Spring, TX 77379

HarmonyCares Medical Group (Medical) 8588 Katy Freeway, Suite 226A Houston, TX 77024

HarmonyCares Medical Group (Billing) 8588 Katy Freeway, Suite 226A Houston, TX 77024

HarmonyCares Medical Group (Radiology) 8588 Katy Freeway, Suite 226A Houston, TX 77024 Wound Evolution | Wound Care & Hyperbaric Medicine (Medical) 17450 St. Lukes Way, Suite 360 Conroe, TX 77384

Wound Evolution | Wound Care & Hyperbaric Medicine (Billing) 17450 St. Lukes Way, Suite 360 Conroe, TX 77384

UTMB Health (Medical) HIM - Release of Information 301 University Blvd Galveston, TX 77555-0782

UTMB Health C/O Document Access Services (Billing) Attention: Josh Taylor 14015 Park Drive, Suite 100 Tomball, TX 77377

UTMB Health (Radiology) HIM - Release of Information 301 University Blvd Galveston, TX 77555-0782

Baylor College of Medicine (Medical) Two Greenway Plaza, Suite 900 Houston, TX 77046

Baylor College of Medicine (Billing) Two Greenway Plaza, Suite 900 Houston, TX 77046

Baylor College of Medicine (Radiology) Two Greenway Plaza, Suite 900 Houston, TX 77046

Houston Methodist Hospital (Medical) Health Information Management Attn: Medical Records Scurlock Tower 6565 Fannin Street, ST-520 Houston, TX 77030

Houston Methodist Hospital c/o Document Access Services (Billing) Attention: Amy 14015 Park Drive Ste100

14015 Park Drive Ste100 Tomball, TX 77377

Houston Methodist Hospital (Radiology) Health Information Management Attn: Medical Records Scurlock Tower 6565 Fannin Street, ST-520 Houston, TX 77030

Houston Cardiovascular Associates (Medical) 6400 Fannin, Suite 3000 Houston, TX 77030 Houston Cardiovascular Associates (Billing) 6400 Fannin, Suite 3000 Houston, TX 77030

Nexus Neurorecovery Center (Medical & Radiology) 9297 Wahrenberger Rd. Conroe, TX 77304

Nexus Neurorecovery Center (Billing) 9297 Wahrenberger Rd. Conroe, TX 77304

Harris County Sheriff's Office (Police report) Attn: COR/Legal Department 1200 Baker Street Houston, TX 77002

before a Notary Public for I

Liberty Litigation Support LLC 7171 Highway 6 North, Suite 250 Houston, TX 77095

(281) 200-5320 or (281) 200-5310 Fax (713) 533-8997

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

/s/Sam A. Houston

By permission

Sam A. Houston State Bar No. 10059550

Email: shouston@schlawyers.com

Cynthia L. Freeman State Bar No. 00789298

Email: cfreeman@schlawyers.com Scott Clawater & Houston, LLP 2727 Allen Parkway, Suite 500

Houston, TX 77019

713-650-6600 Fax 713-579-1599

Attorneys for Defendant, Patrick Shih, M.D. and Patrick

Shih, M.D., P.A.

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, email, FAX, and/or certified mail, return receipt requested, on this day.

Dated: July 12, 2023 by <u>Kristen Chumley</u>

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

City of Houston - EMS 1801 Smith Street, Suite 860 Houston, TX 77002 832-394-6860

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all EMS and/or medical records pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to: Patient Care Reports, assessments, medical history, medical conditions, complaints, medications, diagnosis, treatments administered, patient demographics, vitals, signatures of EMS personnel and patient, transport logs and notes.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

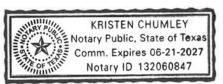
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u> day of July, 2023.



NOTARY PUBLIC

Came to hand this	day of	OFFICER'S , 20	RETURN _, and executed this the	day of	, 20
in the following manner	:: By delivering to	the witness			, a true copy hereof.
Returned this	_day of	, 20			
Order No. 5342.001			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
	Ü	

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Red	stodian of Records for: City of Houston - EMS cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all EMS and/or medical records pertaining to Carl Patrick Blackwood, from 06/11/2011 to to present, including but not limited to: Patient Care Reports, assessments, medical history, medical conditions, complaints, medications, diagnosis, treatments administered, patient demographics, vital signatures of EMS personnel and patient, transport logs and notes.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of medical records for this facility?
	Answer:
4.	In general, how long are patient medical records stored/kept by this facility?
	Answer:
5.	Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:

7.	Please hand to the Officer taking this deposition copies o complied? If not, why?	f the medical records mentioned in Question	No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer taking records?	ng this deposition, true and correct copies of	f all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of b	·	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to ma such medical records.		
	Answer:		
11.	Were the medical records made by nurses, doctors and of acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		THE TERM (C.). I'M CD. 1	
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day per own to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the fo ords attached hereto are exact duplicates of the original rec	e foregoing instrument in the capacity therein regoing questions are true and correct. I fur	
	SWORN TO AND SUBSCRIBED before me this _	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

City of Houston - EMS 1801 Smith Street, Suite 860 Houston, TX 77002 832-394-6860

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

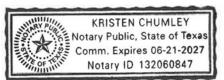
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

Came to hand this	day of	OFFICER'S	RETURN _, and executed this the	day of	, 20,
in the following manner	: By delivering to the	witness			_, a true copy hereof.
Returned this	_day of	, 20			
Order No. 5342.002			PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	IN THE DISTR	ICT COURT OF	
V	S.	HARRIS COU	NTY, TEXAS	
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., IOUSTON NORTHWEST OPERATING COMPANY, I.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § § § § § § §		
	DIRECT QUESTIONS TO BE PA	POUNDED TO TH	E WITNESS	
Re	stodian of Records for: City of Houston - EMS cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all billing records pertaining PRESENT, including but not limited to co-payments, explanations of benefits, clai maintained digitally or in paper format.	charges, insurance pa	ments, patient payments and/or	
1.	Please state your full name.			
	Answer:			
2.	Please state your position and/or job title.			
	Answer:			
3.	Please state your employer's name, business address, and tel	none number.		
	Employer's Name:			
	Address:			
	Phone Number:			
4.	Are you authorized by City of Houston - EMS to produce a Blackwood ?	testify as to the patient ac	counting records of Carl Patrick	
	Answer:			
5.	Has City of Houston - EMS made, or, caused to be made by Patrick Blackwood from 06/11/2021 to the present, which the dollar amount that City of Houston - EMS has adjusted any payments made by, or on behalf of, Carl Patrick Black	out the complete billing h scounted, and/or written of	istory, including, but not limited to,	

Answer:

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Fondren Orthopedic Group 7401 South Main Street Houston, TX 77030 713-799-2300

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S , 20,	RETURN , and executed this the	day of	, 20,
in the following manner	:: By delivering to	the witness			_, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

	No. 2	023-325	61
	CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD	<i>a</i> a a a a a a a a a a a a	IN THE DISTRICT COURT OF
V	YS.	§ §	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	PROPC	OUNDED TO THE WITNESS
Re	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	ding but reports ation re- herapy t and/or cl any and	cords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer.		
	Employer:		
3.	Are you a/the custodian of medical records for this facility	?	
	Answer:		
4.	In general, how long are patient medical records stored/kep	ot by this	facility?
	Answer:		

5. Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or

subject to your control, supervision or direction?

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

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to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

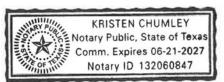
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

Came to hand this	day of	DFFICER'S , 20,	RETURN and executed this the _	day of	, 20,
in the following manner:	: By delivering to the witne	ess			_, a true copy hereof.
Returned this	day of	_, 20			
Order No. 5342 004			PROCESS SERVER		

	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ IN THE DISTRICT COURT OF §			
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ HARRIS COUNTY, TEXAS			
		§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § 234TH JUDICIAL DISTRICT			
	DIRECT QUESTIONS TO BE PI	ROPOUNDED TO THE WITNESS			
Re	PRESENT, including but not limited t	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE to, charges, insurance payments, patient payments and/or tim form and any and all itemized billing statements whether			
1.	Please state your full name.				
	Answer:				
2.	Please state your position and/or job title.				
	Answer:				
3.	Please state your employer's name, business address, and te	elephone number.			
	Employer's Name:				
	Address:				
	Phone Number:				
4.	Are you authorized by Fondren Orthopedic Group to proc Patrick Blackwood?	duce and testify as to the patient accounting records of Carl			
	Answer:				
5.	Carl Patrick Blackwood from 06/11/2021 to the present, w	oup has adjusted, discounted, and/or written off, any third-party			

Answer:

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Fondren Orthopedic Group 7401 South Main Street Houston, TX 77030 713-799-2300

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

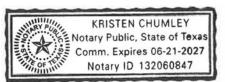
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC	

Came to hand this in the following manner: By	_ day of		RETURN and executed this the	day of	, 20,, a true copy hereof.
Returned this day	of,2	20			
Order No. 5342 005			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL § IN THE DISTRICT CO	OURT OF
BLACKWOOD §	
§	
VS. § HARRIS COUNTY, T	EXAS
§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., §	
HOUSTON NORTHWEST OPERATING COMPANY, §	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE §	
NORTHWEST, A/K/A HOUSTON NORTHWEST §	
MEDICAL CENTER § 234TH JUDICIAL DIS	STRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: Fondren Orthopedic Group Records Pertaining To: Carl Patrick Blackwood

Type of Records: Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, xa

1 y]	including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, descans, angiographs and barium xrays.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of radiology images/films for this facility?
	Answer:
4.	In general, how long are patient radiology images/films kept by this facility?
	Answer:
5.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
6.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	f the radiology images/films mention	oned in Question No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer takin images/films?	ng this deposition, true and correct	copies of all requested radiology
	Answer:		
9.	Are such radiology images/films kept in the regular course	e of business of this facility?	
	Answer:		
10.	Please state if it was in the regular course of business of the events, conditions, opinion, or diagnoses, recorded, to matthe radiology images/films.		
	Answer:		
11.	Were the radiology images/films made by this facility, mattreatment, diagnoses and other information contained therefore thereafter?		
	Answer:		
		WITNESS (Custodian of Record	s)
dul	Before me, the undersigned authority, on this day per own to me to be the person whose name is subscribed to the ly sworn, stated upon his/her oath that the answers to the for ords attached hereto are exact duplicates of the original rec	e foregoing instrument in the capac regoing questions are true and corr	ect. I further certify that the
	SWORN TO AND SUBSCRIBED before me this	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

PAM Health Rehabilitation Hospital of Humble 18839 McKay Dr Humble, TX 77338 281-446-3655

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand thisin the following manner	day of r: By delivering to t		RETURN _, and executed this the	day of	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	110. 20	020 020	701
	CHERYL DURBIN, AS NEXT FRIEND OF CARL ELACKWOOD	§	IN THE DISTRICT COURT OF
V	S.	§ §	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		<i>ૹ ૹ ઌ ઌ ઌ ઌ ઌ ઌ ઌ ઌ</i>	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROPO	DUNDED TO THE WITNESS
Re	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	room roling bu reports ation re aerapy nd/or c	
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer. Employer:		
3.	Are you a/the custodian of medical records for this facility? Answer:		
4.	In general, how long are patient medical records stored/kep		
	Answer:		
5.	Are the medical records outlined in the subpoena duces tec subject to your control, supervision or direction?	um, per	taining to the above-named person, in your custody or

Answer: _____

6.	. Are you able to identify these medical records as the originals or true copies of the originals?	
	Answer:	
7.	. Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. H complied? If not, why?	ave you
	Answer:	
8.	. Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requer records?	sted medical
	Answer:	
9.	. Were such medical records kept in the regular course of business of this facility?	
	Answer:	
10.	 Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledg events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be such medical records. 	
	Answer:	
11.	1. Were the medical records made by nurses, doctors and other employees or representatives made at or near the t acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were rendered, or made reasonably soon thereafter?	
	Answer:	
	WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day personally appeared	ho being firs
	SWORN TO AND SUBSCRIBED before me this day of, 20	0
	NOTARY PUBLIC	
	My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

PAM Health Rehabilitation Hospital of Humble 18839 McKay Dr

Humble, TX 77338 469-241-2100 opt 3

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

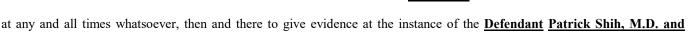
7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:



Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

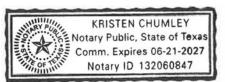
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of	OFFICER'S , 20	RETURN, and executed this the	day of	, 20,
in the following manner: By delivering to the witr	iess			_, a true copy hereof.
Returned this day of	, 20			
Order No. 5242 007		PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		§ IN THE DISTRICT COURT OF §				
VS.			§ § HARRIS COUNTY, TEXAS			
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., OUSTON NORTHWEST OPERATING COMPANY, .L.C., D/B/A HCA HOUSTON HEALTHCARE ORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § § § § § § §				
	DIRECT QUESTIONS TO BE PH	ROPO	UNDED TO THE WITNESS			
Re		to Ca o, char				
1.	Please state your full name.					
	Answer:					
2.	Please state your position and/or job title.					
	Answer:					
3.	Please state your employer's name, business address, and tel	ephone	number.			
	Employer's Name:					
	Address:					
	Phone Number:					
4.	Are you authorized by PAM Health Rehabilitation Hospit records of Carl Patrick Blackwood?	al of Hu	amble to produce and testify as to the patient accounting			
	Answer:					
5.	Has PAM Health Rehabilitation Hospital of Humble mad services rendered to Carl Patrick Blackwood from 06/11/2 including, but not limited to, the dollar amount that PAM He discounted, and/or written off, any third-party adjustments, a Blackwood?	021 to tealth R	he present, which set out the complete billing history, chabilitation Hospital of Humble has adjusted,			
	•					

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Better Life Spine & Pain Center 12518 Cutten Rd Houston, TX 77066 (832) 286-4546

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

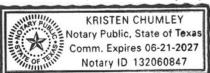
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		RETURN and executed this the	day of _	, 20
in the following manner	•	ne witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	No. 20	123-325	01
	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ § 8	IN THE DISTRICT COURT OF
V	S.	8 8	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST		<i>ፙፙፙፙፙፙፙፙፙፙፙ</i>	234TH JUDICIAL DISTRICT
IVI	IEDICAL CENTER	8	2541H JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROPC	OUNDED TO THE WITNESS
Red	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech th claims, workers' compensation records a and white, including but not limited to a	ing but reports ation re- derapy and/or cl any and	cords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer.		
	Employer:		
3.	Are you a/the custodian of medical records for this facility?	•	
	Answer:		
4.	In general, how long are patient medical records stored/kep	t by this	facility?
	Answer:		
5.	Are the medical records outlined in the subpoena duces tec	um, pert	aining to the above-named person, in your custody or

Answer: ____

subject to your control, supervision or direction?

0.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when th acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared wn to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first y sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the ords attached hereto are exact duplicates of the original records.
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Better Life Spine & Pain Center 12518 Cutten Rd Houston, TX 77066 (832) 286-4546

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

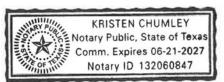
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

Came to hand this	day of	OFFICER'S	RETURN _, and executed this the	day of	, 20,
in the following manner	:: By delivering to the	witness			_, a true copy hereof.
Returned this	_day of	, 20			
Order No. 5342.009			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			IN THE DISTRICT COURT OF				
V	S.	<i>\$</i>	HARRIS COUNTY, TEXAS				
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT				
	DIRECT QUESTIONS TO BE P	ROPO	OUNDED TO THE WITNESS				
Re		to, cha	arl Patrick Blackwood, FROM 06/11/2021 TO THE rges, insurance payments, patient payments and/or n and any and all itemized billing statements whether				
1.	Please state your full name.						
	Answer:						
2.	Please state your position and/or job title.						
	Answer:						
3.	Please state your employer's name, business address, and te	•					
	Employer's Name:						
	Address:						
	Phone Number:						
4.	Are you authorized by Better Life Spine & Pain Center to Patrick Blackwood ?	produc	te and testify as to the patient accounting records of Carl				
	Answer:						
5.	Has Better Life Spine & Pain Center made, or, caused to Carl Patrick Blackwood from 06/11/2021 to the present, v limited to, the dollar amount that Better Life Spine & Pain third-party adjustments, and any payments made by, or on be	which se Center	et out the complete billing history, including, but not r has adjusted, discounted, and/or written off, any				

Answer:

		ase fill in the following blanks with the requested inf ckwood from 06/11/2021 to the present:	Formation concerning medical treatment provided to Carl Patrick
-	A.	Total dollar amount charged for all medical service	es:
		Answer:	
	B.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
-	D.	Total dollar amount paid by any other Texas State	Agency:
		Answer:	
-	E.	Total dollar amount paid by Carl Patrick Blackwo	ood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged o	ff:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
-	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	swe		he foregoing instrument in the capacity therein stated, who being first foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Zion Healthcare of Cypress 10851 Crescent Moon Drive Houston, TX 77064 281-955-4100

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

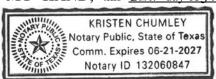
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this 12thday of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		RETURN , and executed this the	day of _	, 20
in the following manne	r: By delivering to	the witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	No. 20	123-32	2561
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		<i>๛๛๛๛๛๛๛๛๛</i>	IN THE DISTRICT COURT OF
V	S.	§	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROP	POUNDED TO THE WITNESS
Re	06/11/2011 TO THE PRESENT, includ pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech th claims, workers' compensation records an and white, including but not limited to a	ing b repor tion i erapy nd/or ny an	records pertaining to Carl Patrick Blackwood, FROM out not limited to records, reports, radiology reports, ets, CT Scan reports, ultrasound reports, memoranda, records, peer review records, physical therapy records, records, pharmacy records, insurance records and/or claims, any and all photographs whether color or black and all documents which may be contained in patient file information sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer. Employer:		
3.	Are you a/the custodian of medical records for this facility? Answer:		
4.	In general, how long are patient medical records stored/kep	t by th	his facility?
	Answer:		

5. Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or

subject to your control, supervision or direction?

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Zion Healthcare of Cypress 10851 Crescent Moon Drive Houston, TX 77064 281-955-4100

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

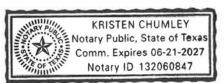
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

		OFFICER'S	RETURN		
Came to hand this	day of	, 20	_, and executed this the	day of _	, 20,
in the following manner	: By delivering to	the witness			_, a true copy hereof.
Returned this	day of	, 20			
			PROCESS SERVER		
Order No. 5342.011					

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	§ IN THE DISTRICT COURT OF §
V	S.	§ HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § § § § § § §
	DIRECT QUESTIONS TO BE PI	ROPOUNDED TO THE WITNESS
Re	PRESENT, including but not limited t	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE o, charges, insurance payments, patient payments and/or im form and any and all itemized billing statements whether
1.	Please state your full name.	
	Answer:	
2.	Please state your position and/or job title.	
	Answer:	
3.	Please state your employer's name, business address, and tel	lephone number.
	Employer's Name:	
	Address:	
	Phone Number:	
4.	Are you authorized by Zion Healthcare of Cypress to prod Patrick Blackwood ?	luce and testify as to the patient accounting records of Carl
	Answer:	
5.	Carl Patrick Blackwood from 06/11/2021 to the present, w	ess has adjusted, discounted, and/or written off, any third-party

6.		ase fill in the following blanks with the requested info ckwood from 06/11/2021 to the present:	rmation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical services:	
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State A	gency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blackwood	od:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged off	:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	sw		e foregoing instrument in the capacity therein stated, who being first regoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Premier General & Colorectal Surgery 129 Vison Park Blvd., Suite 212 Conroe, TX 77384 832-617-9454

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand thisin the following manner	day of		RETURN _, and executed this the	day of	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	NO. 2	1023-323	001
CHERYL D BLACKWO	URBIN, AS NEXT FRIEND OF CARL	§ §	IN THE DISTRICT COURT OF
VS.		§	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		<i>\$</i> \$\text{\$\tau\$} \$\tau\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$ \$\tay\$	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE I	PROPC	OUNDED TO THE WITNESS
Records Pertai	06/11/2011 TO THE PRESENT, inclupathology reports, x-ray reports, MRI correspondence, consultations, rehabilit occupational therapy records, speech t claims, workers' compensation records and white, including but not limited to	room reding bu reports ation reherapy and/or clany and	ecords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda cords, peer review records, physical therapy records records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages
1. Please sta	te your full name and phone number.		
Answer: _			
Phone nur	mber:		
	te the name of your employer.		
•	the custodian of medical records for this facility		
	, how long are patient medical records stored/ke		
Answer: _			
	edical records outlined in the subpoena duces ter your control, supervision or direction?	cum, pert	taining to the above-named person, in your custody or

Answer: ____

6.	. Are you able to identify these medical records as the originals or true copies of the originals?	
	Answer:	
7.	. Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. H complied? If not, why?	ave you
	Answer:	
8.	. Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requer records?	sted medical
	Answer:	
9.	. Were such medical records kept in the regular course of business of this facility?	
	Answer:	
10.	 Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledg events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be such medical records. 	
	Answer:	
11.	1. Were the medical records made by nurses, doctors and other employees or representatives made at or near the t acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were rendered, or made reasonably soon thereafter?	
	Answer:	
	WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day personally appeared	ho being firs
	SWORN TO AND SUBSCRIBED before me this day of, 20	0
	NOTARY PUBLIC	
	My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Premier General & Colorectal Surgery 129 Vison Park Blvd., Suite 212 Conroe, TX 77384 832-617-9454

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

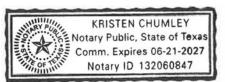
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of	OFFICER'S RETUR		, 20,
in the following manner: By delivering to t	ne witness		a true copy hereof.
Returned this day of	, 20		
Order No. 5342 013	PROCES	SS SERVER	

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		§ IN THE DISTRICT COURT OF §			
V	S.	<pre>\$ HARRIS COUNTY, TEXAS \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$</pre>			
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT		
	DIRECT QUESTIONS TO BE P	ROPO	UNDED TO THE WITNESS		
Rec		g to Ca to, chai	rl Patrick Blackwood, FROM 06/11/2021 TO TH ges, insurance payments, patient payments and/o n and any and all itemized billing statements whether		
l.	Please state your full name.				
	Answer:				
2.	Please state your position and/or job title.				
	Answer:				
3.	Please state your employer's name, business address, and to	elephone	number.		
	Employer's Name:				
	Address:				
	Phone Number:				
1.	Are you authorized by Premier General & Colorectal Sur Carl Patrick Blackwood?	rgery to	produce and testify as to the patient accounting records o		
	Answer:				
5.	Has Premier General & Colorectal Surgery made, or, carendered to Carl Patrick Blackwood from 06/11/2021 to but not limited to, the dollar amount that Premier General off, any third-party adjustments, and any payments made by	the prese	nt, which set out the complete billing history, including, rectal Surgery has adjusted, discounted, and/or written		
	Answer:				

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Modern Heart & Vascular 18980 N Memorial Dr, 100 Humble, TX 77338 832-664-8930

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

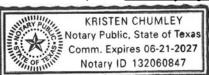
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S , 20	RETURN _, and executed this the	day of	, 20
in the following manner	r: By delivering to	the witness			_, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
WEDICHE CENTER	8	20 IIII GODICINE DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: Modern Heart & Vascular Records Pertaining To: Carl Patrick Blackwood

Type of Records: Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing.

	any other documents reduced to writing.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of medical records for this facility?
	Answer:
4.	Are you a/the custodian for radiology images/films for this facility?
	Answer:
5.	In general, how long are patient medical records stored/kept by this facility?
	Answer:
6.	In general, how long are patient radiology images/films stored/kept by this facility?
	Answer:

7.	Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
8.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
9.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 7. Have you complied? If not, why?
	Answer:
10.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
11.	Were such medical records kept in the regular course of business of this facility?
	Answer:
12.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such record.
	Answer:
13.	Were the medical records made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
14.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
15.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:
16.	Please hand to the Officer taking this deposition, copies of radiology images/films mentioned in Question No. 14. Have you complied? If not, why?
	Answer:

17.	17. Are the copies which you have handed to the Officer taking this deposit images/films?	ion, true and correct copies of all requested radiology
	Answer:	
18.	18. Are such radiology images/films kept in the regular course of business of	of this facility?
	Answer:	
19.	19. Please state if it was in the regular course of business of the above-ment events, conditions, opinion, or diagnoses, recorded, to make the record, the radiology images/films.	
	Answer:	
20.	20. Were the radiology images/films made by this facility, made at, or near treatment, diagnoses and other information contained therein occurred, thereafter?	
	Answer:	
	WITNESS (Custodian of Records)
lul	Before me, the undersigned authority, on this day personally appear known to me to be the person whose name is subscribed to the foregoing ins duly sworn, stated upon his/her oath that the answers to the foregoing questic records attached hereto are exact duplicates of the original records.	trument in the capacity therein stated, who being first
	SWORN TO AND SUBSCRIBED before me this	, 20
	NOTARY P	TRLIC
	My Commiss	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Modern Heart & Vascular 18980 N Memorial Dr, 100 Humble, TX 77338 832-664-8930

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

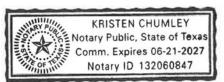
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of, 20 in the following manner: By delivering to the witness	R'S RETURN day of day of	, 20, a true copy hereof.
Returned this day of, 20		
Order No. 5342 015	PROCESS SERVER	

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ §	IN THE DISTRICT COURT OF
		§ §	HARRIS COUNTY, TEXAS
		***	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROPO	OUNDED TO THE WITNESS
Re		to, cha	arl Patrick Blackwood, FROM 06/11/2021 TO THE rges, insurance payments, patient payments and/or n and any and all itemized billing statements whether
1.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title.		
	Answer:		
3.	Please state your employer's name, business address, and te	lephone	number.
	Employer's Name:		
	Address:		
	Phone Number:		
4.	Are you authorized by Modern Heart & Vascular to produce Patrick Blackwood?	uce and	testify as to the patient accounting records of Carl
	Answer:		
5.	Has Modern Heart & Vascular made, or, caused to be materick Blackwood from 06/11/2021 to the present, which the dollar amount that Modern Heart & Vascular has adjust and any payments made by, or on behalf of, Carl Patrick B	set out sted, di	the complete billing history, including, but not limited to, scounted, and/or written off, any third-party adjustments,

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Crimson Heights Health & Wellness 19279 McKay Dr. Humble, TX 77338 346-616-2600

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

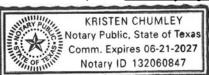
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand thisin the following manner	day of		RETURN _, and executed this the	day of	, 20, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	Š	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: Crimson Heights Health & Wellness

Records Pertaining To: Carl Patrick Blackwood

Type of Records: Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing.

	studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports a any other documents reduced to writing.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of medical records for this facility?
	Answer:
4.	Are you a/the custodian for radiology images/films for this facility?
	Answer:
5.	In general, how long are patient medical records stored/kept by this facility?
	Answer:
6.	In general, how long are patient radiology images/films stored/kept by this facility?
	Answer:

7.	Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?			
	Answer:			
8.	Are you able to identify these medical records as the originals or true copies of the originals?			
	Answer:			
9.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 7. Have you complied? If not, why?			
	Answer:			
10.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?			
	Answer:			
11.	Were such medical records kept in the regular course of business of this facility?			
	Answer:			
12.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such record.			
	Answer:			
13.	Were the medical records made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?			
	Answer:			
14.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?			
	Answer:			
15.	Are you able to identify these radiology images/films as the originals or true copies of the originals?			
	Answer:			
16.	Please hand to the Officer taking this deposition, copies of radiology images/films mentioned in Question No. 14. Have you complied? If not, why?			
	Answer:			

17. Are the copies which you have handed to the Officer taking this deposition, tru images/films?		ng this deposition, true and correct copies of all rec	quested radiology
	Answer:		
18.	Are such radiology images/films kept in the regular cours	e of business of this facility?	
	Answer:		
19.	Please state if it was in the regular course of business of the events, conditions, opinion, or diagnoses, recorded, to matthe radiology images/films.		
	Answer:		
20.	Were the radiology images/films made by this facility, mattreatment, diagnoses and other information contained therefore thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day per own to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the for ords attached hereto are exact duplicates of the original rec	regoing questions are true and correct. I further ce	
	SWORN TO AND SUBSCRIBED before me this	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Crimson Heights Health & Wellness 19279 McKay Dr. Humble, TX 77338 346-616-2600

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

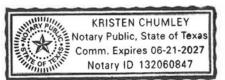
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S RETU , 20, and ex	JRN ecuted this the	day of	, 20,
in the following manner	: By delivering to t	he witness			_, a true copy hereof.
Returned this	day of	, 20			
		PROG	CESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL SLACKWOOD	<i>ॼॼॼॼॼॼॼॼॼॼॼॼ</i>	IN THE DISTRICT COURT OF
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			HARRIS COUNTY, TEXAS
			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPOU	NDED TO THE WITNESS
Re		g to Carl o, charge	Patrick Blackwood, FROM 06/11/2021 TO THE is, insurance payments, patient payments and/or and any and all itemized billing statements whether
1.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title.		
	Answer:		
3.	Please state your employer's name, business address, and te	lephone nu	mber.
	Employer's Name:		
	Address:		
	Phone Number:		
4.	Are you authorized by Crimson Heights Health & Wellner Carl Patrick Blackwood?	ss to produ	ace and testify as to the patient accounting records of
	Answer:		
5.	Has Crimson Heights Health & Wellness made, or, caused rendered to Carl Patrick Blackwood from 06/11/2021 to the but not limited to, the dollar amount that Crimson Heights any third-party adjustments, and any payments made by, or one of the control of the contr	ne present, Health &	which set out the complete billing history, including, Wellness has adjusted, discounted, and/or written off,

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Memorial Hermann Health System Release of Information 7737 SWF C94 Houston, TX 77074 713-456-5576, opt 4

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of *July*, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		RETURN and executed this the	day of _	, 20			
C	in the following manner: By delivering to the witness, a true copy hereof.							
Returned this	_ day of	, 20						
			PROCESS SERVER					

	110. 2	020 02001	
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		§ §	IN THE DISTRICT COURT OF
VS.		§ §	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PAHOUSTON NORTHWEST L.L.C., D/B/A HCA HOUS NORTHWEST, A/K/A HOMEDICAL CENTER	OPERATING COMPANY, TON HEALTHCARE	<i>ၹႜၮၮၮၮၮၮၮၮ</i>	234TH JUDICIAL DISTRICT
DIREC	CT QUESTIONS TO BE I	PROPOU	INDED TO THE WITNESS
Records Pertaining To: Carl I Type of Records: Any and 06/11/2011 pathology correspond occupation claims, wo and white from other	all medical and emergency and the PRESENT, including reports, x-ray reports, MRI dence, consultations, rehability all therapy records, speech the price of the compensation records and including but not limited to a second seco	room reco ding but a reports, (ation reco herapy rec and/or clai any and al	ords pertaining to Carl Patrick Blackwood, FROM not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, rds, peer review records, physical therapy records, cords, pharmacy records, insurance records and/or ms, any and all photographs whether color or black ll documents which may be contained in patient file nation sheet, handwritten notes, telephone messages,
1. Please state your full nam	e and phone number.		
Answer:			
Phone number:			
2. Please state the name of y Employer:	our employer.		
·	f medical records for this facility		
4. In general, how long are p	patient medical records stored/kep	pt by this fa	ncility?
Answer:			
5. Are the medical records o subject to your control, su		cum, pertair	ning to the above-named person, in your custody or

Answer: ____

6.	Are you able to identify these medical records as the originals or true copies of the originals?							
	Answer:							
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?							
	Answer:							
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?							
	Answer:							
9.	Were such medical records kept in the regular course of business of this facility?							
	Answer:							
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.							
	Answer:							
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?							
	Answer:							
	WITNESS (Custodian of Records)							
dul	Before me, the undersigned authority, on this day personally appeared							
	SWORN TO AND SUBSCRIBED before me this day of, 20							
	NOTARY PUBLIC							
	My Commission Expires:							

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Memorial Hermann Health System Release of Information 7737 SWF C94 Houston, TX 77074 713-456-5576, opt 4

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

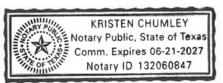
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u> day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		S RETURN	day of	20
Came to nand this	day of	, 20	, and executed this the	day of _	, 20
in the following manne	er: By delivering to	the witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		
Order No. 5342 019					

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			IN THE DISTRICT COURT OF	
V	S.	§ §	HARRIS COUNTY, TEXAS	
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., OUSTON NORTHWEST OPERATING COMPANY, .L.C., D/B/A HCA HOUSTON HEALTHCARE ORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § § § § § § §		
	DIRECT QUESTIONS TO BE PE	ROPOU	UNDED TO THE WITNESS	
Re		o, charg	Patrick Blackwood, FROM 06/11/2021 TO THE ges, insurance payments, patient payments and/or and any and all itemized billing statements whether	
1.	Please state your full name.			
	Answer:			
2.	Please state your position and/or job title.			
	Answer:			
3.	Please state your employer's name, business address, and tel	ephone r	number.	
	Employer's Name:			
	Address:			
	Phone Number:			
4.	Are you authorized by Memorial Hermann Health System Carl Patrick Blackwood?	to produ	ace and testify as to the patient accounting records of	
	Answer:			
5.	Has Memorial Hermann Health System made, or, caused rendered to Carl Patrick Blackwood from 06/11/2021 to the but not limited to, the dollar amount that Memorial Herman any third-party adjustments, and any payments made by, or continuous to the continuous	e presen in Healt	t, which set out the complete billing history, including, h System has adjusted, discounted, and/or written off,	

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Memorial Hermann Health System Release of Information 7737 SWF C94 Houston, TX 77074 713-242-3401 (opt 4)

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

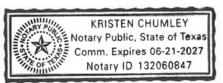
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u> day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S	RETURN , and executed this the	day of	, 20
in the following manner	r: By delivering to t	 -			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		
OJ., NI. 5242 020					

No. 20	023-3256	51
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD	§ §	IN THE DISTRICT COURT OF
VS.	\$\tau\$ \tau \tau \tau \tau \tau \tau \tau \tau	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY,	§ §	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST	§ §	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
scans, angiographs and barium xrays.	n to Carl	
1. Please state your full name and phone number.		
Answer:		
Phone number:		
2. Please state the name of your employer.		

Employer:

In general, how long are patient radiology images/films kept by this facility?

Answer:

Are you able to identify these radiology images/films as the originals or true copies of the originals?

Answer:

Are you a/the custodian of radiology images/films for this facility?

or subject to your control, supervision or direction?

Please hand to the Officer taking this deposition copies of the radiology images/films mentioned in Question No. 5. Have you

Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?						
	Answer:						
9.	Are such radiology images/films kept in the regular course of business of this facility?						
	Answer:						
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.						
	Answer:						
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?						
	Answer:						
	WITNESS (Custodian of Records)						
duly	Before me, the undersigned authority, on this day personally appeared						
	SWORN TO AND SUBSCRIBED before me this day of, 20						
	NOTARY PUBLIC						
	My Commission Expires:						

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Texas ENT Specialists 10740 N. Gessner Rd., Suite 310 Houston, TX 77064 281-351-8407

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

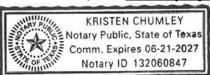
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S , 20,	RETURN , and executed this the	day of	, 20,
in the following manner	:: By delivering to	the witness			_, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

	110. 20	023-323	01				
	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	<i>ଊଊଊଊଊଊଊଊଊଊଊଊଊ</i>	IN THE DISTRICT COURT OF				
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			HARRIS COUNTY, TEXAS				
			234TH JUDICIAL DISTRICT				
	DIRECT QUESTIONS TO BE P	PROPO	OUNDED TO THE WITNESS				
Re	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	ling but reports ation re- nerapy t nd/or cl any and	cords pertaining to Carl Patrick Blackwood, FROM to not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or aims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,				
1.	Please state your full name and phone number.						
	Answer:						
	Phone number:						
2.	Please state the name of your employer. Employer:						
	Employer:						
3.	Are you a/the custodian of medical records for this facility?	?					
	Answer:						
4.	In general, how long are patient medical records stored/kept by this facility?						
	Answer:						
5.	Are the medical records outlined in the subpoena duces tec						

Answer: _____

subject to your control, supervision or direction?

6.	Are you able to identify these medical records as the originals or true copies of the originals?				
	Answer:				
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?				
	Answer:				
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?				
	Answer:				
9.	Were such medical records kept in the regular course of business of this facility?				
	Answer:				
10. Please state if it was the regular course of business of the above-mentioned facility, for a person with knowled events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be such medical records.					
	Answer:				
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?				
	Answer:				
	WITNESS (Custodian of Records)				
dul	Before me, the undersigned authority, on this day personally appeared				
	SWORN TO AND SUBSCRIBED before me this day of, 20				
	NOTARY PUBLIC				
	My Commission Expires:				

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Texas ENT Specialists 10740 N. Gessner Rd., Suite 310 Houston, TX 77064 281-351-8407

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

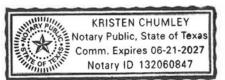
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S RETUR		day of	, 20,
in the following manner	_, a true copy hereof.				
Returned this	day of	, 20			
		PROCE	SS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS				
V	S.					
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., IOUSTON NORTHWEST OPERATING COMPANY, I.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § 234TH JUDICIAL DISTRICT				
	DIRECT QUESTIONS TO BE PA	POUNDED TO THE	WITNESS			
Re	stodian of Records for: Texas ENT Specialists cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all billing records pertaining PRESENT, including but not limited to co-payments, explanations of benefits, clai maintained digitally or in paper format.	charges, insurance payr	nents, patient payments and/or			
1.	Please state your full name.					
	Answer:					
2.	Please state your position and/or job title.					
	Answer:					
3.	Please state your employer's name, business address, and tel	one number.				
	Employer's Name:					
	Address:					
	Phone Number:					
4.	Are you authorized by Texas ENT Specialists to produce an Blackwood ?	estify as to the patient acco	unting records of Carl Patrick			
	Answer:					
5.	Has Texas ENT Specialists made, or, caused to be made by billing and accounting records for services rendered to Carl Patrick Blackwood from 06/11/2021 to the present, which set out the complete billing history, including, but not limited to, the dollar amount that Texas ENT Specialists has adjusted, discounted, and/or written off, any third-party adjustments, and any payments made by, or on behalf of, Carl Patrick Blackwood ?					

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Texas ENT Specialists 10740 N. Gessner Rd., Suite 310 Houston, TX 77064 281-351-8407

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

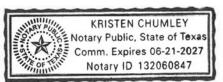
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		OFFICER'S		1 0	20
Came to hand this	day of	, 20,	and executed this the	day of	, 20,
in the following manner	r: By delivering to the wit	ness			_, a true copy hereof.
Returned this	_ day of				
			PROCESS SERVER		
Order No. 5342.023					

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§.	
	8	
VS.	8	HARRIS COUNTY, TEXAS
	8	111111111111111111111111111111111111111
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	8	
	8	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
DIRECT QUESTIONS TO BE P	ROPO	UNDED TO THE WITNESS

Rec	stodian of Records for: Texas ENT Specialists cords Pertaining To: Carl Patrick Blackwood be of Records: Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of radiology images/films for this facility?
	Answer:
4.	In general, how long are patient radiology images/films kept by this facility?
	Answer:
5.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
6.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the radiology images/films mentioned in Question No. 5. Have you complied? If not, why?
	Answer:

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?						
	Answer:						
9.	Are such radiology images/films kept in the regular course of business of this facility?						
	Answer:						
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.						
	Answer:						
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?						
	Answer:						
	WITNESS (Custodian of Records)						
duly	Before me, the undersigned authority, on this day personally appeared						
	SWORN TO AND SUBSCRIBED before me this day of, 20						
	NOTARY PUBLIC						
	My Commission Expires:						

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Strategic Wound Care 700 E. Marshall Ave. Longview, TX 75601 832-465-3514

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

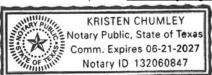
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of		RETURN , and executed this the	day of	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	No. 20	123-	-3	02501
	CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		<i>©</i> © © © © © © © © © © © © © © © © © ©	IN THE DISTRICT COURT OF
vs.			§	HARRIS COUNTY, TEXAS
H L N	PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	RC	- [C	POUNDED TO THE WITNESS
Re	06/11/2011 TO THE PRESENT, includ pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech th claims, workers' compensation records an and white, including but not limited to a	ing rep tion era nd/o	po n ap or	a records pertaining to Carl Patrick Blackwood, FROM but not limited to records, reports, radiology reports, orts, CT Scan reports, ultrasound reports, memoranda, records, peer review records, physical therapy records, by records, pharmacy records, insurance records and/or r claims, any and all photographs whether color or black and all documents which may be contained in patient file information sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.			
	Answer:			
	Phone number:			
2.	Please state the name of your employer. Employer:			
3.	Are you a/the custodian of medical records for this facility? Answer:			
4.	In general, how long are patient medical records stored/kep	t by	y t	this facility?
	Answer:			
5.	Are the medical records outlined in the subpoena duces tech subject to your control, supervision or direction?	um,	, p	pertaining to the above-named person, in your custody or

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Strategic Wound Care 700 E. Marshall Ave. Longview, TX 75601 832-465-3514

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

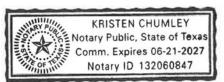
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of	OFFICER'S	S RETURN, and executed this the	day of	, 20,
in the following manner: By delivering to the w	itness			, a true copy hereof.
Returned this day of	, 20			
Ondon No. 5242 025		PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § 234TH JUDICIAL DISTRICT			
V	S.	§ HARRIS COUNTY, TEXAS				
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT			
	DIRECT QUESTIONS TO BE PI	ROPOU	INDED TO THE WITNESS			
Re		o, charg	l Patrick Blackwood, FROM 06/11/2021 TO THE tes, insurance payments, patient payments and/or and any and all itemized billing statements whether			
1.	Please state your full name.					
	Answer:					
2.	Please state your position and/or job title.					
	Answer:					
3.	Please state your employer's name, business address, and tel	-				
	Address:					
	Phone Number:					
4.	Are you authorized by Strategic Wound Care to produce a Blackwood ?	nd testify	as to the patient accounting records of Carl Patrick			
	Answer:					
5.	Has Strategic Wound Care made, or, caused to be made by Patrick Blackwood from 06/11/2021 to the present, which the dollar amount that Strategic Wound Care has adjusted, any payments made by, or on behalf of, Carl Patrick Black	set out the	e complete billing history, including, but not limited to,			

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

CHI St. Luke's Health - The Woodlands Hospital

Health Information Management

17200 St. Luke's Way, Suite 150 (Mail Code 7-204)

The Woodlands, TX 77384 936-266-2000

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence. (Original Treatment Location: St. Luke's Health Springwoods Village Hospital)

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the Defendant Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manne	day of		RETURN , and executed this the	day of	, 20, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ IN THE DISTRICT COURT OF §
V	S.	§ HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ IN THE DISTRICT COURT OF § HARRIS COUNTY, TEXAS § § \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
	DIRECT QUESTIONS TO BE P	PROPOUNDED TO THE WITNESS
Red	06/11/2011 TO THE PRESENT, including pathology reports, x-ray reports, MRI correspondence, consultations, rehabilitation occupational therapy records, speech the claims, workers' compensation records an and white, including but not limited to a from other care providers, including patients.	coom records pertaining to Carl Patrick Blackwood, FROM ling but not limited to records, reports, radiology reports, reports, CT Scan reports, ultrasound reports, memoranda, ation records, peer review records, physical therapy records, herapy records, pharmacy records, insurance records and/or nd/or claims, any and all photographs whether color or black any and all documents which may be contained in patient file ient information sheet, handwritten notes, telephone messages, reatment Location: St. Luke's Health Springwoods Village
1.	Please state your full name and phone number.	
	Answer:	
	Phone number:	
2.	Please state the name of your employer.	
	Employer:	
3.	Are you a/the custodian of medical records for this facility?	
	Answer:	
4.	In general, how long are patient medical records stored/kept	t by this facility?
	Answer:	
5.	Are the medical records outlined in the subpoena duces tecu subject to your control, supervision or direction?	um, pertaining to the above-named person, in your custody or

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

CHI St. Luke's Health - The Woodlands Hospital

Attn: Patient Financial Services

17200 St. Luke's Way

The Woodlands, TX 77384 936-266-2000

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format. (Original Treatment Location: St. Luke's Health Springwoods Village Hospital)

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

•

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

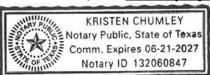
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

	OFFICER'S RETURN		
Came to hand this day of _	, 20, and executed this the	e day of _	, 20,
in the following manner: By delivering	g to the witness		_, a true copy hereof.
Returned this day of	, 20		
	PROCESS SERVER	R	

	CHERYL DURBIN, AS NEXT FRIEND OF CARL SLACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	§ §	HARRIS COUNTY, TEXAS
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., IOUSTON NORTHWEST OPERATING COMPANY, I.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	<i>\$</i> \$\tau\$	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PR	ROP	OUNDED TO THE WITNESS
Re	co-payments, explanations of benefits, clai	to o, cl	
l.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title. Answer:		
3.	Please state your employer's name, business address, and tel Employer's Name:	epho	one number.
	Address:		
	Phone Number:		
1.	Are you authorized by CHI St. Luke's Health - The Wood records of Carl Patrick Blackwood?	land	s Hospital to produce and testify as to the patient accounting
	Answer:		
5.	Has CHI St. Luke's Health - The Woodlands Hospital maservices rendered to Carl Patrick Blackwood from 06/11/2 including, but not limited to, the dollar amount that CHI St. discounted, and/or written off, any third-party adjustments, a Blackwood?	021 t Luk	to the present, which set out the complete billing history, e's Health - The Woodlands Hospital has adjusted,
	A		

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

CHI St. Luke's Health - The Woodlands Hospital Radiology Department 17200 St. Luke's Way The Woodlands, TX 77384 936-266-2000

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays. (Original Treatment Location: St. Luke's Health Springwoods Village Hospital)

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

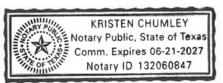
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of	OFFICER'S	RETURN , and executed this the	day of	, 20
in the following manner: By delivering to the w				, a true copy hereof.
Returned this day of	, 20			
O.J., N. 5242 029		PROCESS SERVER		

	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	<i>\$\text{\tint{\text{\tint{\text{\text{\text{\text{\text{\text{\text{\text{\text{\tint{\text{\tin}\text{\text{\text{\text{\text{\text{\text{\text{\text{\teint{\text{\tin}\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\tex{\tex</i>	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PE	ROP	OUNDED TO THE WITNESS
Rec		to Ca	•
l.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer. Employer:		
3.	Are you a/the custodian of radiology images/films for this fa	cility	?
1.	In general, how long are patient radiology images/films kept Answer:	•	·
5.	Are the radiology images/films outlined in the subpoena duc or subject to your control, supervision or direction? Answer:		
	AMDITOL.		
5.	Are you able to identify these radiology images/films as the Answer:		•
7.	Please hand to the Officer taking this deposition copies of th complied? If not, why?	e rad	iology images/films mentioned in Question No. 5. Have you

Answer: ___

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?
	Answer:
9.	Are such radiology images/films kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.
	Answer:
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared, we note to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first y sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the ords attached hereto are exact duplicates of the original records.
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Texas Surgical Dermatology 21009 Kuykendahl Rd. Ste A Spring, TX 77379 832-663-6566

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

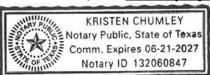
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of	OFFICER'S , 20	RETURN _, and executed this the	day of	, 20, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

	No. 20	23-325	61
	CHERYL DURBIN, AS NEXT FRIEND OF CARL SLACKWOOD	§	IN THE DISTRICT COURT OF
V	'S.	§	HARRIS COUNTY, TEXAS
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., IOUSTON NORTHWEST OPERATING COMPANY, I.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	<i>\$\$</i>	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPC	OUNDED TO THE WITNESS
Re	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilitations occupational therapy records, speech the claims, workers' compensation records and white, including but not limited to a	ing bureports tion recapy and/or claps and	cords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer.		
	Employer:		
3.	Are you a/the custodian of medical records for this facility?		
	Answer:		
4.	In general, how long are patient medical records stored/kept	by this	s facility?
	Answer:		

5. Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or

Order No. 5342.029

Answer:

subject to your control, supervision or direction?

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Texas Surgical Dermatology 21009 Kuykendahl Rd. Ste A Spring, TX 77379 832-663-6566

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

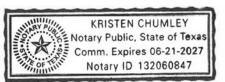
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



	11
NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of By delivering to the w		RETURN _, and executed this the	day of	, 20, , a true copy hereof.
Returned this	_day of	, 20			
Order No. 5342 030			PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	§ IN THE DISTRICT COURT OF §
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ HARRIS COUNTY, TEXAS
		§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § 234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPOUNDED TO THE WITNESS
Re	PRESENT, including but not limited to	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE o, charges, insurance payments, patient payments and/or im form and any and all itemized billing statements whether
1.	Please state your full name.	
	Answer:	
2.	Please state your position and/or job title.	
	Answer:	
3.	Please state your employer's name, business address, and tel	lephone number.
	Employer's Name:	
	Address:	
	Phone Number:	
4.	Are you authorized by Texas Surgical Dermatology to properties Blackwood ?	duce and testify as to the patient accounting records of Carl
	Answer:	
5.	Carl Patrick Blackwood from 06/11/2021 to the present, w	ogy has adjusted, discounted, and/or written off, any third-party

6.		Please fill in the following blanks with the requested information concerning medical treatment provided to Carl Patrick Blackwood from 06/11/2021 to the present:				
	A.	Total dollar amount charged for all medical service	ces:			
		Answer:				
	В.	Total dollar amount paid by Private Insurer:				
		Answer:				
	C.	Total dollar amount paid by Medicare/Medicaid:				
		Answer:				
	D.	Total dollar amount paid by any other Texas State	e Agency:			
		Answer:				
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:			
		Answer:				
	F.	Total dollar amount written, adjusted, or charged	off:			
		Answer:				
	G.	Total dollar amount still owed:				
		Answer:				
	H.	Who owes remaining balance?				
		Answer:				
			WITNESS (Custodian of Records)			
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the			
		SWORN TO AND SUBSCRIBED before me this	s, 20			
			NOTARY PUBLIC			
			My Commission Expires:			

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

IPR Healthcare System, Inc. 1328 S. Loop W., Suite 100 Houston, TX 77054 713-592-6776

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the Defendant Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

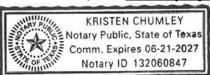
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of		RETURN , and executed this the	day of	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	No. 20	23-325	61
	ERYL DURBIN, AS NEXT FRIEND OF CARL	§ §	IN THE DISTRICT COURT OF
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ §	HARRIS COUNTY, TEXAS
		*****************	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROPC	OUNDED TO THE WITNESS
Recor	06/11/2011 TO THE PRESENT, include pathology reports, x-ray reports, MRI correspondence, consultations, rehabilitate occupational therapy records, speech the claims, workers' compensation records and white, including but not limited to a	ing bureports tion receiver apy and/or cl	cords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,
1. P	lease state your full name and phone number.		
A	inswer:		
P	hone number:		
	lease state the name of your employer.		
Е	mployer:		
3. A	are you a/the custodian of medical records for this facility?		
A	answer:		
4. Ir	n general, how long are patient medical records stored/kep	t by this	facility?
A	answer:		

5. Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or

subject to your control, supervision or direction?

6.	. Are you able to identify these medical records as the originals or true copies of the originals?	
	Answer:	
7.	. Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. H complied? If not, why?	ave you
	Answer:	
8.	. Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requer records?	sted medical
	Answer:	
9.	. Were such medical records kept in the regular course of business of this facility?	
	Answer:	
10.	 Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledg events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be such medical records. 	
	Answer:	
11.	1. Were the medical records made by nurses, doctors and other employees or representatives made at or near the t acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were rendered, or made reasonably soon thereafter?	
	Answer:	
	WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day personally appeared	ho being firs
	SWORN TO AND SUBSCRIBED before me this day of, 20	0
	NOTARY PUBLIC	
	My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

IPR Healthcare System, Inc. 1328 S. Loop W., Suite 100 Houston, TX 77054 713-592-6776

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

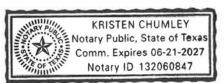
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S RETURN, 20, and executed this the	e day of _	
in the following manner	: By delivering to t	he witness		_, a true copy hereof.
Returned this	day of	, 20		
		PROCESS SERVE	ER	

	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ IN THE DISTRICT COURT OF §
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ HARRIS COUNTY, TEXAS
		§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § 234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPOUNDED TO THE WITNESS
Re	PRESENT, including but not limited t	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE o, charges, insurance payments, patient payments and/or im form and any and all itemized billing statements whether
1.	Please state your full name.	
	Answer:	
2.	Please state your position and/or job title.	
	Answer:	
3.	Please state your employer's name, business address, and tel	lephone number.
	Employer's Name:	
	Address:	
	Phone Number:	
4.	Are you authorized by IPR Healthcare System, Inc. to pro Patrick Blackwood?	duce and testify as to the patient accounting records of Carl
	Answer:	
5.	Carl Patrick Blackwood from 06/11/2021 to the present, w	Inc. has adjusted, discounted, and/or written off, any third-party

6.		ase fill in the following blanks with the requested info ckwood from 06/11/2021 to the present:	rmation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical services:	
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State A	gency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blackwood	od:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged off	:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	sw		e foregoing instrument in the capacity therein stated, who being first regoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Pinard Home Health 17819 Stuebner Airline Rd., Suite F Spring, TX 77379 281-205-7948

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

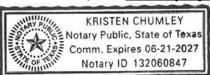
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of		RETURN , and executed this the	day of	, 20, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

	10. 2020 22001	
	CHERYL DURBIN, AS NEXT FRIEND OF CARL \$ IN THE DISTRICT COURT OF \$ BLACKWOOD \$	
V	YS. \$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
H L N	CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD S VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER S IN THE DISTRICT COURT OF S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE S HARRIS COUNTY, TEXAS S VALUE	
	DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS	
Red	exercise Pertaining To: Carl Patrick Blackwood repe of Records: Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FR 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports pathology reports, x-ray reports, MRl reports, CT Scan reports, ultrasound reports, memoral correspondence, consultations, rehabilitation records, peer review records, physical therapy records and claims, workers' compensation records and/or claims, any and all photographs whether color or be and white, including but not limited to any and all documents which may be contained in patient from other care providers, including patient information sheet, handwritten notes, telephone messal and any correspondence.	orts, nda, ords, d/or lack
1.	Please state your full name and phone number.	
	Answer:	_
	Phone number:	_
2.	Please state the name of your employer. Employer:	
3.	Are you a/the custodian of medical records for this facility? Answer:	_
4.	In general, how long are patient medical records stored/kept by this facility?	
	Answer:	_
5.	Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?	
	Answer:	_

6. Are you able to identify these medical records as the originals or true copies of the originals?

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	of the medical records mentioned in Que	estion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer take records?	ing this deposition, true and correct cop	ies of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of	business of this facility?	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to ma such medical records.		
	Answer:		
11.	Were the medical records made by nurses, doctors and o acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day person to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the foords attached hereto are exact duplicates of the original resords.	e foregoing instrument in the capacity to pregoing questions are true and correct.	
	SWORN TO AND SUBSCRIBED before me this _	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Pinard Home Health 17819 Stuebner Airline Rd., Suite F Spring, TX 77379 281-205-7948

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

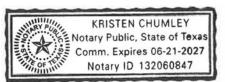
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



1/1	
NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of		S RETURN, and executed this the	day of	, 20,
in the following manner: By delivering to the wi	_, a true copy hereof.			
Returned this day of	, 20			
Order No. 5342 024		PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ IN THE DISTRICT COURT OF			
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		<pre> \$ \$ \$ HARRIS COUNTY, TEXAS \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$</pre>			
Re	PRESENT, including but not limited to	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE to, charges, insurance payments, patient payments and/or time form and any and all itemized billing statements whether			
1.	Please state your full name.				
	Answer:				
2.	Please state your position and/or job title.				
	Answer:				
3.	Please state your employer's name, business address, and te	se state your employer's name, business address, and telephone number.			
	Employer's Name:				
	Address:				
	Phone Number:				
4.	Are you authorized by Pinard Home Health to produce an Blackwood ?	d testify as to the patient accounting records of Carl Patrick			
	Answer:				
5.	Patrick Blackwood from 06/11/2021 to the present, which	billing and accounting records for services rendered to Carl set out the complete billing history, including, but not limited to, discounted, and/or written off, any third-party adjustments, and any od?			

		ase fill in the following blanks with the requested inf ckwood from 06/11/2021 to the present:	Formation concerning medical treatment provided to Carl Patrick
-	A.	Total dollar amount charged for all medical service	es:
		Answer:	
	B.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
-	D.	Total dollar amount paid by any other Texas State	Agency:
		Answer:	
-	E.	Total dollar amount paid by Carl Patrick Blackwo	ood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged o	ff:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
-	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	swe		he foregoing instrument in the capacity therein stated, who being first foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

HarmonyCares Medical Group 8588 Katy Freeway, Suite 226A Houston, TX 77024 713-532-6884

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

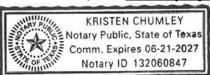
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of <u>July</u>, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S , 20	RETURN _, and executed this the	day of	, 20
in the following manner	r: By delivering to	the witness			_, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	110. 20	J23-32	.301
	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	§ §	HARRIS COUNTY, TEXAS
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., OUSTON NORTHWEST OPERATING COMPANY, .L.C., D/B/A HCA HOUSTON HEALTHCARE ORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	<i>\$\tau\$</i> \$\tau\$ \$\tau\$ \$\tay\$	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROP	OUNDED TO THE WITNESS
Re	06/11/2011 TO THE PRESENT, include pathology reports, x-ray reports, MRI correspondence, consultations, rehabilitations occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	ling b repor ition i erapy nd/or iny ar	records pertaining to Carl Patrick Blackwood, FROM out not limited to records, reports, radiology reports, ets, CT Scan reports, ultrasound reports, memoranda, records, peer review records, physical therapy records, records, pharmacy records, insurance records and/or claims, any and all photographs whether color or black and all documents which may be contained in patient file aformation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer.		
	Employer:		
3.	Are you a/the custodian of medical records for this facility? Answer:		
4.	In general, how long are patient medical records stored/kep	ot by th	nis facility?
	Answer:		
5.	Are the medical records outlined in the subpoena duces tec subject to your control, supervision or direction?	um, pe	ertaining to the above-named person, in your custody or

Answer:

6.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 5. Have you complied? If not, why?
	Answer:
8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
9.	Were such medical records kept in the regular course of business of this facility?
	Answer:
10.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such medical records.
	Answer:
11.	Were the medical records made by nurses, doctors and other employees or representatives made at or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
dul	Before me, the undersigned authority, on this day personally appeared
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

HarmonyCares Medical Group 8588 Katy Freeway, Suite 226A Houston, TX 77024 713-532-6884

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and</u> Patrick Shih, M.D., P.A. represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. 2023-32561, pending

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

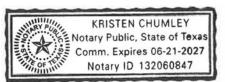
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of	OFFICER'S RETURN, 20, and executed this the	the day of _	, 20,
in the following manner: By delivering	_, a true copy hereof.		
Returned this day of	, 20		
Order No. 5342 036	PROCESS SERV	ER	

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § 234TH JUDICIAL DISTRICT			
V	S.	§ HARRIS COUNTY, TEXAS				
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT			
	DIRECT QUESTIONS TO BE PI	RO	POUNDED TO THE WITNESS			
Re	PRESENT, including but not limited t	0, (Carl Patrick Blackwood, FROM 06/11/2021 TO THE charges, insurance payments, patient payments and/or form and any and all itemized billing statements whether			
1.	Please state your full name.					
	Answer:					
2.	Please state your position and/or job title. Answer:					
	Allower.					
3.	Please state your employer's name, business address, and tel	leph	none number.			
	Employer's Name:					
	Address:					
	Phone Number:					
4.	Are you authorized by HarmonyCares Medical Group to patrick Blackwood?	proc	luce and testify as to the patient accounting records of Carl			
	Answer:					
5.	Has HarmonyCares Medical Group made, or, caused to b Carl Patrick Blackwood from 06/11/2021 to the present, we limited to, the dollar amount that HarmonyCares Medical third-party adjustments, and any payments made by, or on be	vhic Gr o	oup has adjusted, discounted, and/or written off, any			
	Answer:					

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

HarmonyCares Medical Group 8588 Katy Freeway, Suite 226A Houston, TX 77024 713-532-6884

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:



at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

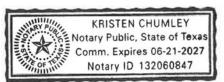
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of		RETURN, and executed this the	day of	, 20,
in the following manner: By delivering to the wi	, a true copy hereof.			
Returned this day of	, 20			
Onder No. 5242 027		PROCESS SERVER		

	10. 2	020 020	•		
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		§ §	IN THE DISTRICT COURT OF		
		§	HARRIS COUNTY, TEXAS		
		<i>w w w w w w w w w</i>	234TH JUDICIAL DISTRICT		
	DIRECT QUESTIONS TO BE P	PROPO	OUNDED TO THE WITNESS		
Re	istodian of Records for: HarmonyCares Medical Group cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all radiology films pertaining including but not limited to, any and all C scans, angiographs and barium xrays.		Patrick Blackwood, from 06/11/2011 to the present, MRI's, arthrography, discography, fluoroscopy, dexa		
1.	Please state your full name and phone number.				
	Answer:				
	Phone number:				
2.	Please state the name of your employer.				
	Employer:				
3.	Are you a/the custodian of radiology images/films for this	facility?			
	Answer:				
4.	In general, how long are patient radiology images/films kep	pt by this	facility?		
	Answer:				
5.	Are the radiology images/films outlined in the subpoena du or subject to your control, supervision or direction?	uces tecu	m, pertaining to the above-named person, in your custody		
	Answer:				
6.	Are you able to identify these radiology images/films as the				
	Answer:				
7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	the radio	logy images/films mentioned in Question No. 5. Have you		

Answer: ____

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?					
	Answer:					
9.	Are such radiology images/films kept in the regular course of business of this facility?					
	Answer:					
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.					
	Answer:					
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?					
	Answer:					
	WITNESS (Custodian of Records)					
duly	Before me, the undersigned authority, on this day personally appeared					
	SWORN TO AND SUBSCRIBED before me this day of, 20					
	NOTARY PUBLIC					
	My Commission Expires:					

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Wound Evolution | Wound Care & Hyperbaric Medicine 17450 St. Lukes Way, Suite 360 Conroe, TX 77384 281-872-6306

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

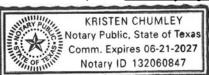
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

		OFFICER'S	RETURN		
Came to hand this	day of		_, and executed this the	day of	, 20,
in the following manner	:: By delivering to	the witness			_, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

		110. 20	10 013	VI				
	HERYL DUR LACKWOOI	RBIN, AS NEXT FRIEND OF CARL	§ §	IN THE DISTRICT COURT OF				
V	S.		§ §	HARRIS COUNTY, TEXAS				
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			<i>\$\$</i>	234TH JUDICIAL DISTRICT				
		DIRECT QUESTIONS TO BE P	ROPO	OUNDED TO THE WITNESS				
Re	cords Pertainin	06/11/2011 TO THE PRESENT, includ pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech th claims, workers' compensation records an and white, including but not limited to a	oom re ing but reports tion rec erapy ind/or cl ny and	cords pertaining to Carl Patrick Blackwood, FROM t not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, cords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or aims, any and all photographs whether color or black all documents which may be contained in patient file transition sheet, handwritten notes, telephone messages,				
1.	Please state y	Please state your full name and phone number.						
	Answer:	Answer:						
	Phone number	er:						
2.		he name of your employer.						
3.	•	e custodian of medical records for this facility?						
4.	In general, ho	ow long are patient medical records stored/kep	t by this	facility?				
	Answer:							
5.	subject to yo	ur control, supervision or direction?		aining to the above-named person, in your custody or				
	Allswer:							
6.	Are you able	to identify these medical records as the origina	als or tru	ue copies of the originals?				

Answer:

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	f the medical records mentioned in Ques	stion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer takin records?	ng this deposition, true and correct copic	es of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of b	·	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to masuch medical records.	• • •	
	Answer:		
11.	Were the medical records made by nurses, doctors and ot acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day per own to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the fo ords attached hereto are exact duplicates of the original rec	e foregoing instrument in the capacity the regoing questions are true and correct.	I further certify that the
	SWORN TO AND SUBSCRIBED before me this	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Wound Evolution | Wound Care & Hyperbaric Medicine 17450 St. Lukes Way, Suite 360 Conroe, TX 77384 281-872-6306

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

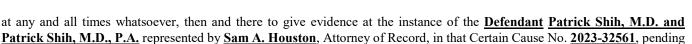
7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:



This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

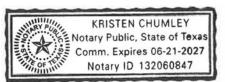
CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



-//	
NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of		RETURN _, and executed this the	day of	, 20,
in the following manner: By delivering to the wit	_, a true copy hereof.			
Returned this day of	, 20			
Order No. 5342 030		PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			IN THE DISTRICT COURT OF		
V	S.	<i>\$\$</i> \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$	HARRIS COUNTY, TEXAS		
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT		
	DIRECT QUESTIONS TO BE PI	ROPO	OUNDED TO THE WITNESS		
Re		g to C			
1.	Please state your full name.				
	Answer:				
2.	Please state your position and/or job title.				
	Answer:				
3.	Please state your employer's name, business address, and te	•			
	Employer's Name:				
	Address:Phone Number:				
4.	Are you authorized by Wound Evolution Wound Care & accounting records of Carl Patrick Blackwood ?	: Нуре	rbaric Medicine to produce and testify as to the patient		
	Answer:				
5.	Has Wound Evolution Wound Care & Hyperbaric Med records for services rendered to Carl Patrick Blackwood finistory, including, but not limited to, the dollar amount that adjusted, discounted, and/or written off, any third-party adju Patrick Blackwood?	rom 06 Wound	/11/2021 to the present, which set out the complete billing I Evolution Wound Care & Hyperbaric Medicine has		
	Answer:				

6.		ase fill in the following blanks with the requested info ckwood from 06/11/2021 to the present:	rmation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical services:	
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State A	gency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blackwood	od:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged off	:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	sw		e foregoing instrument in the capacity therein stated, who being first regoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

UTMB Health

HIM - Release of Information

301 University Blvd

Galveston, TX 77555-0782 409-772-1965

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

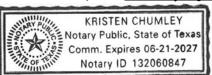
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of *July*, 2023.



176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		RETURN and executed this the	day of _	, 20
in the following manner	•	ne witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	8 8	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		***	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE F	PROPO	OUNDED TO THE WITNESS
Re	pathology reports, x-ray reports, MRI correspondence, consultations, rehability occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	ding bu reports ation re herapy and/or c any and	ecords pertaining to Carl Patrick Blackwood, FROM at not limited to records, reports, radiology reports, s, CT Scan reports, ultrasound reports, memoranda, ecords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or laims, any and all photographs whether color or black I all documents which may be contained in patient file ormation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer. Employer:		
3.	Are you a/the custodian of medical records for this facility Answer:		
4.	In general, how long are patient medical records stored/kep		
	Answer:		
5.	Are the medical records outlined in the subpoena duces tec subject to your control, supervision or direction?	cum, per	taining to the above-named person, in your custody or

6. Are you able to identify these medical records as the originals or true copies of the originals?

Answer:

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	of the medical records mentioned in Que	estion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer take records?	ing this deposition, true and correct cop	ies of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of	business of this facility?	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to ma such medical records.		
	Answer:		
11.	Were the medical records made by nurses, doctors and o acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day person to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the foords attached hereto are exact duplicates of the original resords.	e foregoing instrument in the capacity to pregoing questions are true and correct.	
	SWORN TO AND SUBSCRIBED before me this _	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

UTMB Health C/O Document Access Services Attention: Josh Taylor

14015 Park Drive, Suite 100

Tomball, TX 77377 832-639-8821

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, physician billing, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

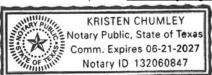
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand thisin the following manner	day of		RETURN _, and executed this the	day of	, 20, a true copy hereof.
Returned this	_day of	, 20			
			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD			IN THE DISTRICT COURT OF
V	S.	<i>。</i>	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROP	OUNDED TO THE WITNESS
Re		g to C o, ph ons of	Carl Patrick Blackwood, FROM 06/11/2021 TO THE ysician billing, charges, insurance payments, patient benefits, claim form and any and all itemized billing
1.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title.		
	Answer:		
3.	Please state your employer's name, business address, and te	lephor	ne number.
	Employer's Name:		
	Address:		
	Phone Number:		
4.	Are you authorized by UTMB Health C/O Document Accorded of Carl Patrick Blackwood?	ess Se	rvices to produce and testify as to the patient accounting
	Answer:		
5.	Has UTMB Health C/O Document Access Services made services rendered to Carl Patrick Blackwood from 06/11/2 including, but not limited to, the dollar amount that UTMB discounted, and/or written off, any third-party adjustments, a Blackwood?	021 to Healt	the present, which set out the complete billing history, h C/O Document Access Services has adjusted,

Answer: ___

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

UTMB Health HIM - Release of Information 301 University Blvd Galveston, TX 77555-0782 409-772-1965

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

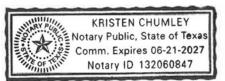
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

G 1 . 1.11			RETURN	1 0	20
Came to hand this	day of	_, 20	, and executed this the	day of _	, 20
in the following manner: By	delivering to the witness _				_, a true copy hereof.
Returned this day of	of, 20_	·			
			DD C CEGG CEDI WED		
Order No. 5342.042			PROCESS SERVER		
Oluci No. 3342.042					

CHERYL DURBIN, AS NEXT FRIEND OF CARL	8	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
DATEDICIA CHINI M.D. DATEDICIA CHINI M.D. DA	8	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
DIRECT QUESTIONS TO BE F	ROPO	UNDED TO THE WITNESS

C ₁₁	-4- diam of December 6 and LITMD Hoolds
Re	stodian of Records for: UTMB Health cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of radiology images/films for this facility?
	Answer:
4.	In general, how long are patient radiology images/films kept by this facility?
	Answer:
5.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
6.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the radiology images/films mentioned in Question No. 5. Have you complied? If not, why?
	Answer:

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?					
	Answer:					
9.	Are such radiology images/films kept in the regular course of business of this facility?					
	Answer:					
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.					
	Answer:					
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?					
	Answer:					
	WITNESS (Custodian of Records)					
duly	Before me, the undersigned authority, on this day personally appeared					
	SWORN TO AND SUBSCRIBED before me this day of, 20					
	NOTARY PUBLIC					
	My Commission Expires:					

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Baylor College of Medicine Two Greenway Plaza, Suite 900 Houston, TX 77046 713-798-5259

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

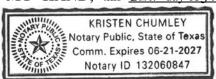
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CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this 12thday of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of		RETURN and executed this the	day of	, 20,, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	NO. 20	123-32301	
	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	8 8 6	HARRIS COUNTY, TEXAS
H L. N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., OUSTON NORTHWEST OPERATING COMPANY, .L.C., D/B/A HCA HOUSTON HEALTHCARE ORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	<i>ॼॼॼॼॼॼॼॼॼ</i>	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE P	ROPOU	INDED TO THE WITNESS
Rec	pathology reports, x-ray reports, MRI correspondence, consultations, rehabilita occupational therapy records, speech th claims, workers' compensation records an and white, including but not limited to a	ing but reports, tion reco erapy recond/or clain	ords pertaining to Carl Patrick Blackwood, FROM not limited to records, reports, radiology reports, CT Scan reports, ultrasound reports, memoranda, rds, peer review records, physical therapy records, cords, pharmacy records, insurance records and/or ms, any and all photographs whether color or black ll documents which may be contained in patient file mation sheet, handwritten notes, telephone messages,
1.	Please state your full name and phone number.		
	Answer:		
	Phone number:		
2.	Please state the name of your employer. Employer:		
3.	Are you a/the custodian of medical records for this facility?		
	Answer:		
4.	In general, how long are patient medical records stored/kep	t by this fa	acility?
	Answer:		

6. Are you able to identify these medical records as the originals or true copies of the originals?

subject to your control, supervision or direction?

Answer:

Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	of the medical records mentioned in Que	estion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer take records?	ing this deposition, true and correct cop	ies of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of	business of this facility?	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to ma such medical records.		
	Answer:		
11.	Were the medical records made by nurses, doctors and o acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day person to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the foords attached hereto are exact duplicates of the original resords.	e foregoing instrument in the capacity to pregoing questions are true and correct.	
	SWORN TO AND SUBSCRIBED before me this _	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Baylor College of Medicine Two Greenway Plaza, Suite 900 Houston, TX 77046 713-798-5259

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

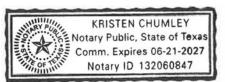
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC	

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S RETURN, 20, and executed this the	day of _	
in the following manner	:: By delivering to	the witness		, a true copy hereof.
Returned this	_day of	, 20		
0.1.31.5242.044		PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	§ IN THE DISTRICT COURT OF §
V	S.	§ HARRIS COUNTY, TEXAS
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., IOUSTON NORTHWEST OPERATING COMPANY, I.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER	§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § 234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPOUNDED TO THE WITNESS
Re	PRESENT, including but not limited t	g to Carl Patrick Blackwood, FROM 06/11/2021 TO THE to, charges, insurance payments, patient payments and/or im form and any and all itemized billing statements whether
1.	Please state your full name.	
	Answer:	
2.	Please state your position and/or job title.	
	Answer:	
3.	Please state your employer's name, business address, and tel	lephone number.
	Employer's Name:	
	Address:	
	Phone Number:	
4.	Are you authorized by Baylor College of Medicine to prod Patrick Blackwood ?	uce and testify as to the patient accounting records of Carl
	Answer:	
5.	Carl Patrick Blackwood from 06/11/2021 to the present, w	ine has adjusted, discounted, and/or written off, any third-party

Answer:

		ase fill in the following blanks with the requested inf ckwood from 06/11/2021 to the present:	Formation concerning medical treatment provided to Carl Patrick
-	A.	Total dollar amount charged for all medical service	es:
		Answer:	
	B.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
-	D.	Total dollar amount paid by any other Texas State	Agency:
		Answer:	
-	E.	Total dollar amount paid by Carl Patrick Blackwo	ood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged o	ff:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
-	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	swe		he foregoing instrument in the capacity therein stated, who being first foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

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to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

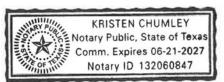
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

	FICER'S RETURN, 20, and executed this the day of	, 20,
in the following manner: By delivering to the witness		_, a true copy hereof.
Returned this day of, 2	.0	
Order No. 5342 045	PROCESS SERVER	

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT
	·	
DIDECT OUESTIONS TO BE D	$\mathbf{p} \mathbf{n} \mathbf{p} \mathbf{n}$	UNDED TO THE WITNESS

Re	stodian of Records for: Baylor College of Medicine cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of radiology images/films for this facility?
	Answer:
4.	In general, how long are patient radiology images/films kept by this facility?
	Answer:
5.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
6.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:
7.	Please hand to the Officer taking this deposition copies of the radiology images/films mentioned in Question No. 5. Have you complied? If not, why?
	Answer:

Answer:	
_	

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?				
	Answer:				
9.	Are such radiology images/films kept in the regular course of business of this facility?				
	Answer:				
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.				
	Answer:				
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?				
	Answer:				
	WITNESS (Custodian of Records)				
duly	Before me, the undersigned authority, on this day personally appeared				
	SWORN TO AND SUBSCRIBED before me this day of, 20				
	NOTARY PUBLIC				
	My Commission Expires:				

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Houston Methodist Hospital Health Information Management

Attn: Medical Records Scurlock Tower 6565 Fannin Street, ST-520 Houston, TX 77030 713-441-2401

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of *July*, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manner	day of		RETURN _, and executed this the	day of _	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

C	CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF	
	LACKWOOD	§ 8		
V	S.	§	HARRIS COUNTY, TEXAS	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		***	234TH JUDICIAL DISTRICT	
	DIRECT QUESTIONS TO BE P	PROP	OUNDED TO THE WITNESS	
Re	06/11/2011 TO THE PRESENT, include pathology reports, x-ray reports, MRI correspondence, consultations, rehability occupational therapy records, speech the claims, workers' compensation records a and white, including but not limited to a	ding by report ation report ation report and/or any an	records pertaining to Carl Patrick Blackwood, FROM ut not limited to records, reports, radiology reports, ts, CT Scan reports, ultrasound reports, memoranda, ecords, peer review records, physical therapy records, records, pharmacy records, insurance records and/or claims, any and all photographs whether color or black d all documents which may be contained in patient file formation sheet, handwritten notes, telephone messages,	
1.	Please state your full name and phone number.			
	Answer:			
	Phone number:			
2.	Please state the name of your employer. Employer:			
3.	Are you a/the custodian of medical records for this facility? Answer:			
4.	In general, how long are patient medical records stored/kept by this facility?			
	Answer:			
5.	Are the medical records outlined in the subpoena duces tec subject to your control, supervision or direction?	eum, pe	rtaining to the above-named person, in your custody or	
	Answer:			

6. Are you able to identify these medical records as the originals or true copies of the originals?

Answer:

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	of the medical records mentioned in Que	estion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer take records?	ing this deposition, true and correct cop	ies of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of	business of this facility?	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to ma such medical records.		
	Answer:		
11.	Were the medical records made by nurses, doctors and o acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day person to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the foords attached hereto are exact duplicates of the original resords.	e foregoing instrument in the capacity to pregoing questions are true and correct.	
	SWORN TO AND SUBSCRIBED before me this _	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Houston Methodist Hospital c/o Document Access Services

Attention: Amy

14015 Park Drive Ste100

Tomball, TX 77377 832-639-8821

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D.</u> and <u>Patrick Shih, M.D.</u>, <u>P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

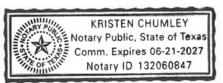
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	DFFICER'S , 20	RETURN , and executed this the	day of	, 20
in the following manner	: By delivering to the witn	ness			, a true copy hereof.
Returned this	day of	_, 20			
Order No. 5342.047			PROCESS SERVER		

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD		§ IN THE DISTRICT COURT OF § § HARRIS COUNTY, TEXAS § § § § § § § § § § § § §		
VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER			HARRIS COUNTY, TEXAS	
			234TH JUDICIAL DISTRICT	
	DIRECT QUESTIONS TO BE PR	ROPOU	NDED TO THE WITNESS	
Re		to Carl o, charge		
1.	Please state your full name.			
	Answer:			
2.	Please state your position and/or job title.			
	Answer:			
3.	Please state your employer's name, business address, and tel	•		
	Employer's Name:			
	Address:			
	Phone Number:			
4.	Are you authorized by Houston Methodist Hospital c/o Do accounting records of Carl Patrick Blackwood ?	cument A	access Services to produce and testify as to the patient	
	Answer:			
5.	Has Houston Methodist Hospital c/o Document Access Serecords for services rendered to Carl Patrick Blackwood fr history, including, but not limited to, the dollar amount that I has adjusted, discounted, and/or written off, any third-party a Patrick Blackwood?	om <mark>06/11</mark> / H <mark>ouston N</mark>	2021 to the present, which set out the complete billing Methodist Hospital c/o Document Access Services	
	A			

		ase fill in the following blanks with the requested inf ckwood from 06/11/2021 to the present:	Formation concerning medical treatment provided to Carl Patrick
-	A.	Total dollar amount charged for all medical service	es:
		Answer:	
	B.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
-	D.	Total dollar amount paid by any other Texas State	Agency:
		Answer:	
-	E.	Total dollar amount paid by Carl Patrick Blackwo	ood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged o	ff:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
-	Н.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	swe		he foregoing instrument in the capacity therein stated, who being first foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	day of
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Houston Methodist Hospital Health Information Management Attn: Medical Records Scurlock Tower 6565 Fannin Street, ST-520 Houston, TX 77030 713-441-2401

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all radiology films pertaining to Carl Patrick Blackwood, from 06/11/2011 to the present, including but not limited to, any and all CT Scans, MRI's, arthrography, discography, fluoroscopy, dexa scans, angiographs and barium xrays.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of *July*, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this in the following manne	day of		RETURN _, and executed this the	day of _	, 20, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL \$ BLACKWOOD \$	IN THE DISTRICT COURT OF
V	VS. §	HARRIS COUNTY, TEXAS
H L N	VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER \$	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PROPO	UNDED TO THE WITNESS
Re	Custodian of Records for: Houston Methodist Hospital Records Pertaining To: Carl Patrick Blackwood Type of Records: Any and all radiology films pertaining to Carl including but not limited to, any and all CT Scans, scans, angiographs and barium xrays.	Patrick Blackwood, from 06/11/2011 to the present MRI's, arthrography, discography, fluoroscopy, dexa
1.	1. Please state your full name and phone number.	
	Answer:	
	Phone number:	
2.	2. Please state the name of your employer.	
	Employer:	
3.	3. Are you a/the custodian of radiology images/films for this facility? Answer:	
4.	4. In general, how long are patient radiology images/films kept by this Answer:	facility?
5.	5. Are the radiology images/films outlined in the subpoena duces tecun or subject to your control, supervision or direction?	n, pertaining to the above-named person, in your custody
	Answer:	
6.	6. Are you able to identify these radiology images/films as the original	s or true copies of the originals?
	Answer:	
7.	7. Please hand to the Officer taking this deposition copies of the radiole complied? If not, why?	ogy images/films mentioned in Question No. 5. Have you

8.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?					
	Answer:					
9.	Are such radiology images/films kept in the regular course of business of this facility?					
	Answer:					
10.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.					
	Answer:					
11.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?					
	Answer:					
	WITNESS (Custodian of Records)					
duly	Before me, the undersigned authority, on this day personally appeared					
	SWORN TO AND SUBSCRIBED before me this day of, 20					
	NOTARY PUBLIC					
	My Commission Expires:					

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Houston Cardiovascular Associates 6400 Fannin, Suite 3000 Houston, TX 77030 713-790-0841

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical and emergency room records pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to records, reports, radiology reports, pathology reports, x-ray reports, MRI reports, CT Scan reports, ultrasound reports, memoranda, correspondence, consultations, rehabilitation records, peer review records, physical therapy records, occupational therapy records, speech therapy records, pharmacy records, insurance records and/or claims, workers' compensation records and/or claims, any and all photographs whether color or black and white, including but not limited to any and all documents which may be contained in patient file from other care providers, including patient information sheet, handwritten notes, telephone messages, and any correspondence.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A. represented by Sam A. Houston, Attorney of Record, in that Certain Cause No. 2023-32561, pending on the docket of the District Court of the 234th Judicial District of Harris County, Texas.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

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Came to hand this	day of		RETURN and executed this the	day of _	, 20
in the following manner	•	ne witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS. PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER S	IN THE DISTRICT COURT OF
V	VS. §	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PROI	POUNDED TO THE WITNESS
Re	pathology reports, x-ray reports, MRI repo correspondence, consultations, rehabilitation occupational therapy records, speech therap claims, workers' compensation records and/or and white, including but not limited to any a	records pertaining to Carl Patrick Blackwood, FROM but not limited to records, reports, radiology reports, rts, CT Scan reports, ultrasound reports, memoranda, records, peer review records, physical therapy records, y records, pharmacy records, insurance records and/or claims, any and all photographs whether color or black nd all documents which may be contained in patient file nformation sheet, handwritten notes, telephone messages,
1.	1. Please state your full name and phone number.	
	Answer:	
	Phone number:	
2.	Please state the name of your employer. Employer:	
3.	3. Are you a/the custodian of medical records for this facility?	
	Answer:	
4.	4. In general, how long are patient medical records stored/kept by t	his facility?
	Answer:	
5.	5. Are the medical records outlined in the subpoena duces tecum, p subject to your control, supervision or direction?	ertaining to the above-named person, in your custody or
	Answer:	
6.	6. Are you able to identify these medical records as the originals or	true copies of the originals?

7.	Please hand to the Officer taking this deposition copies of complied? If not, why?	f the medical records mentioned in Ques	stion No. 5. Have you
	Answer:		
8.	Are the copies which you have handed to the Officer takin records?	ng this deposition, true and correct copic	es of all requested medical
	Answer:		
9.	Were such medical records kept in the regular course of b	·	
	Answer:		
10.	Please state if it was the regular course of business of the events, conditions, opinion, or diagnoses, recorded to masuch medical records.	• • •	
	Answer:		
11.	Were the medical records made by nurses, doctors and ot acts, events, conditions, courses of treatment, diagnoses a rendered, or made reasonably soon thereafter?		
	Answer:		
		WITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day per own to me to be the person whose name is subscribed to the y sworn, stated upon his/her oath that the answers to the fo ords attached hereto are exact duplicates of the original rec	e foregoing instrument in the capacity the regoing questions are true and correct.	I further certify that the
	SWORN TO AND SUBSCRIBED before me this	day of	, 20
		NOTARY PUBLIC	
		My Commission Expires:	

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Houston Cardiovascular Associates 6400 Fannin, Suite 3000 Houston, TX 77030 713-790-0841

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

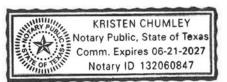
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this day of		RETURN _, and executed this the	day of	, 20,
in the following manner: By delivering to the wit	tness			_, a true copy hereof.
Returned this day of	, 20			
Order No. 5342 050		PROCESS SERVER		

No. **2023-32561**

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	§ §	IN THE DISTRICT COURT OF
V	S.	§ §	HARRIS COUNTY, TEXAS
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		<i>~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~</i>	234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PR		OUNDED TO THE WITNESS
Re	stodian of Records for: Houston Cardiovascular Associates cords Pertaining To: Carl Patrick Blackwood pe of Records: Any and all billing records pertaining PRESENT, including but not limited to	to (
1.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title.		
	Answer:		
3.	Please state your employer's name, business address, and tele	ephor	ne number.
	Employer's Name:		
	Address:		
	Phone Number:		
4.	Are you authorized by Houston Cardiovascular Associates Carl Patrick Blackwood?	to pi	roduce and testify as to the patient accounting records of
	Answer:		
5.	Has Houston Cardiovascular Associates made, or, caused to rendered to Carl Patrick Blackwood from 06/11/2021 to the but not limited to, the dollar amount that Houston Cardiova any third-party adjustments, and any payments made by, or o	e pres	sent, which set out the complete billing history, including, ar Associates has adjusted, discounted, and/or written off,

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Nexus Neurorecovery Center 9297 Wahrenberger Rd. Conroe, TX 77304 (936) 788-7770

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of		RETURN and executed this the	day of _	, 20
in the following manner	•	ne witness			, a true copy hereof.
Returned this	_ day of	, 20			
			PROCESS SERVER		

No. 2023-32561

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	§	234TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: Nexus Neurorecovery Center

Records Pertaining To: Carl Patrick Blackwood

Type of Records: Any and all medical records and radiology films/reports pertaining to Carl Patrick Blackwood, FROM 06/11/2011 TO THE PRESENT, including but not limited to, patient histories, admissions, discharges, nurses' notes, physician's notes, medication logs, toxicology tests and results, any and all reports, notes, tests, test results, diagnoses, prognoses, office records, clinic records, physical therapy records and correspondence, all radiology studies including x-rays, CT scans, MRI scans and any other imaging studies (disk if possible), all radiology reports, all imaging reports, all lab results, progress reports and any other documents reduced to writing

	any other documents reduced to writing.
1.	Please state your full name and phone number.
	Answer:
	Phone number:
2.	Please state the name of your employer.
	Employer:
3.	Are you a/the custodian of medical records for this facility? Answer:
4.	Are you a/the custodian for radiology images/films for this facility? Answer:
5.	In general, how long are patient medical records stored/kept by this facility? Answer:
6.	In general, how long are patient radiology images/films stored/kept by this facility?
	Answer:

7.	Are the medical records outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
8.	Are you able to identify these medical records as the originals or true copies of the originals?
	Answer:
9.	Please hand to the Officer taking this deposition copies of the medical records mentioned in Question No. 7. Have you complied? If not, why?
	Answer:
10.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested medical records?
	Answer:
11.	Were such medical records kept in the regular course of business of this facility?
	Answer:
12.	Please state if it was the regular course of business of the above-mentioned facility, for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof, to be included in such record.
	Answer:
13.	Were the medical records made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
14.	Are the radiology images/films outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?
	Answer:
15.	Are you able to identify these radiology images/films as the originals or true copies of the originals?
	Answer:
16.	Please hand to the Officer taking this deposition, copies of radiology images/films mentioned in Question No. 14. Have you complied? If not, why?
	Answer:

17.	Are the copies which you have handed to the Officer taking this deposition, true and correct copies of all requested radiology images/films?
	Answer:
18.	Are such radiology images/films kept in the regular course of business of this facility?
	Answer:
19.	Please state if it was in the regular course of business of the above-mentioned facility, for a person with knowledge of the acts events, conditions, opinion, or diagnoses, recorded, to make the record, or to transmit information thereof, to be included in the radiology images/films.
	Answer:
20.	Were the radiology images/films made by this facility, made at, or near the time when the acts, events, conditions, courses of treatment, diagnoses and other information contained therein occurred, were observed, or rendered, or made reasonably soon thereafter?
	Answer:
	WITNESS (Custodian of Records)
luly	Before me, the undersigned authority, on this day personally appeared, we note to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first y sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the ords attached hereto are exact duplicates of the original records.
	SWORN TO AND SUBSCRIBED before me this day of, 20
	NOTARY PUBLIC
	My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Nexus Neurorecovery Center 9297 Wahrenberger Rd. Conroe, TX 77304 (936) 788-7770

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all billing records pertaining to Carl Patrick Blackwood, FROM 06/11/2021 TO THE PRESENT, including but not limited to, charges, insurance payments, patient payments and/or co-payments, explanations of benefits, claim form and any and all itemized billing statements whether maintained digitally or in paper format.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D.</u> and <u>Patrick Shih, M.D.</u>, <u>P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County</u>, <u>Texas</u>.

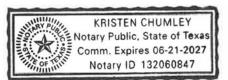
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of July, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Came to hand this	day of	OFFICER'S , 20	RETURN _, and executed this the	day of	, 20,
in the following manne	r: By delivering to th	ne witness			_, a true copy hereof.
Returned this	_ day of	, 20			
Order No. 5342.052			PROCESS SERVER		

No. **2023-32561**

	HERYL DURBIN, AS NEXT FRIEND OF CARL LACKWOOD	<i>ᢍᢍᢍᢍᢍᢍᡂᢍᢍᢍ</i>	IN THE DISTRICT COURT OF
V	S.	§ §	HARRIS COUNTY, TEXAS
H L N	PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA., HOUSTON NORTHWEST OPERATING COMPANY, L.L.C., D/B/A HCA HOUSTON HEALTHCARE NORTHWEST, A/K/A HOUSTON NORTHWEST MEDICAL CENTER		234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO BE PI	ROPOU	NDED TO THE WITNESS
Re		o, charge	Patrick Blackwood, FROM 06/11/2021 TO THE es, insurance payments, patient payments and/or and any and all itemized billing statements whether
1.	Please state your full name.		
	Answer:		
2.	Please state your position and/or job title.		
	Answer:		
3.	Please state your employer's name, business address, and tel	-	
	Address:		
	Phone Number:		
4.	Are you authorized by Nexus Neurorecovery Center to pro Patrick Blackwood?	oduce and	testify as to the patient accounting records of Carl
	Answer:		
5.	Has Nexus Neurorecovery Center made, or, caused to be r Carl Patrick Blackwood from 06/11/2021 to the present, w limited to, the dollar amount that Nexus Neurorecovery Ce adjustments, and any payments made by, or on behalf of, Ca	hich set o	out the complete billing history, including, but not adjusted, discounted, and/or written off, any third-party

6.		ase fill in the following blanks with the requested in ckwood from 06/11/2021 to the present:	nformation concerning medical treatment provided to Carl Patrick
	A.	Total dollar amount charged for all medical service	ces:
		Answer:	
	В.	Total dollar amount paid by Private Insurer:	
		Answer:	
	C.	Total dollar amount paid by Medicare/Medicaid:	
		Answer:	
	D.	Total dollar amount paid by any other Texas State	e Agency:
		Answer:	
	E.	Total dollar amount paid by Carl Patrick Blacks	wood:
		Answer:	
	F.	Total dollar amount written, adjusted, or charged	off:
		Answer:	
	G.	Total dollar amount still owed:	
		Answer:	
	H.	Who owes remaining balance?	
		Answer:	
			WITNESS (Custodian of Records)
duly	/ SW	Before me, the undersigned authority, on this day o me to be the person whose name is subscribed to orn, stated upon his/her oath that the answers to the attached hereto are exact duplicates of the original	the foregoing instrument in the capacity therein stated, who being first the foregoing questions are true and correct. I further certify that the
		SWORN TO AND SUBSCRIBED before me this	s, 20
			NOTARY PUBLIC
			My Commission Expires:

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es): Custodian of Records for:

Harris County Sheriff's Office Attn: COR/Legal Department 1200 Baker Street

Houston, TX 77002 346-286-1550

to be and appear before a Notary Public of my designation for

Liberty Litigation Support LLC (281) 200-5320 or (281) 200-5310

7171 Highway 6 North, Suite 250, Houston, TX 77095

or its designated agent, by the twentieth day of receipt of the subpoena at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

The complete investigative file pertaining to Carl Patrick Blackwood, relating to the accident on 06/11/2021, including but not limited to, reports, supplements, notes, video footage including officer's body cams and dash cams, witness statements (whether written or recorded), and photographs.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

Carl Patrick Blackwood Date of Birth:

e instance of the **Defendant Patrick Shi**

at any and all times whatsoever, then and there to give evidence at the instance of the <u>Defendant Patrick Shih, M.D. and Patrick Shih, M.D., P.A.</u> represented by <u>Sam A. Houston</u>, Attorney of Record, in that Certain Cause No. <u>2023-32561</u>, pending on the docket of the <u>District Court of the 234th Judicial District of Harris County, Texas.</u>

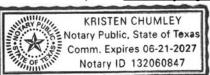
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

CHERYL DURBIN, AS NEXT FRIEND OF CARL BLACKWOOD VS.

PATRICK SHIH, M.D., ET AL.

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this <u>12th</u>day of *July*, 2023.



NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt*. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

	OFFICER'S RETU	RN		
Came to hand this day of _			day of	, 20,
in the following manner: By delivering	g to the witness		, ;	a true copy hereof.
Returned this day of	, 20			
	PROC	ESS SERVER		

	CHERYL DURBIN, AS NEXT FRIEND OF CARL CLACKWOOD	· ·	IN THE DISTRICT COURT OF
V	'S.	§ §	HARRIS COUNTY, TEXAS
H L N	ATRICK SHIH, M.D., PATRICK SHIH, M.D., PA IOUSTON NORTHWEST OPERATING COMPA J.L.C., D/B/A HCA HOUSTON HEALTHCARE IORTHWEST, A/K/A HOUSTON NORTHWEST IEDICAL CENTER		234TH JUDICIAL DISTRICT
	DIRECT QUESTIONS TO	BE PROPO	OUNDED TO THE WITNESS
Red		aining to Carl	Patrick Blackwood, relating to the accident on supplements, notes, video footage including officer's nether written or recorded), and photographs.
1.	Please state your full name.		
	Answer:		
2.	Please state by whom you are employed and the busing	iness address a	nd telephone number.
	Answer:		
3.	What is the title of your position or job?		
	Answer:		
4.	Are these memoranda, reports, records, or data compabove-named person, in your custody or subject to y		
	Answer:		
5.	Are you able to identify these aforementioned record	ds as the origina	als or true and correct copies of the originals?
	Answer:		
6.	Please hand to the Officer taking this deposition cop in Question No. 4. Have you complied? If not, why		oranda, reports, records, or data compilations, mentioned
	Answer:		
7.	Are the copies which you have handed to the Officer reports, records, or data compilations.	r taking this dep	position true and correct copies of such memoranda,

Answer: ____

8.	Were such memoranda, reports, records, or data compilation	is kept in the regular course of business of this facility?	
	Answer:		
9.	Was it in the regular course of business of this facility for a partial diagnoses, recorded to make the record or to transmit information.		nion, oi
	Answer:		
10.	. Were the entries on these records made at or shortly after the		
	Answer:		
11.	. Was the method of preparation of these records trustworthy?	,	
	Answer:		
	W	VITNESS (Custodian of Records)	
dul	Before me, the undersigned authority, on this day person own to me to be the person whose name is subscribed to the for ly sworn, stated upon his/her oath that the answers to the foregoods attached hereto are exact duplicates of the original record	soing questions are true and correct. I further certify that t	
	SWORN TO AND SUBSCRIBED before me this	, 20	·
	N	OTARY PUBLIC	
	N	My Commission Expires:	

CHERYL DURBIN, AS NEXT FRIEND OF CARL	§	IN THE DISTRICT COURT OF
BLACKWOOD	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
PATRICK SHIH, M.D., PATRICK SHIH, M.D., PA.,	§	
HOUSTON NORTHWEST OPERATING COMPANY,	§	
L.L.C., D/B/A HCA HOUSTON HEALTHCARE	§	
NORTHWEST, A/K/A HOUSTON NORTHWEST	§	
MEDICAL CENTER	Š	234TH JUDICIAL DISTRICT

WAIVER OF NOTICE

Our client, Sam A. Houston, has commissioned Liberty Litigation Support LLC to obtain records on Carl Patrick Blackwood from the following custodian for use in the above referenced case.

IF COPIES ARE DESIRED, PLEASE INDICATE BELOW BY MARKING Y OR N. Original records will be held inhouse for 30 days. Copies may not be available after that time.

1	C'A CHI A ENIC (ENIC)
 1	City of Houston - EMS (EMS)
 2	City of Houston - EMS (Billing)
 3	Fondren Orthopedic Group (Medical)
 4	Fondren Orthopedic Group (Billing)
 5	Fondren Orthopedic Group (Radiology)
 6	PAM Health Rehabilitation Hospital of Humble (Medical)
 7	PAM Health Rehabilitation Hospital of Humble (Billing)
 8	Better Life Spine & Pain Center (Medical)
 9	Better Life Spine & Pain Center (Billing)
 10	V1
	Zion Healthcare of Cypress (Billing)
 12	8 , \ /
 13	8 (8)
 14	Modern Heart & Vascular (Medical & Radiology)
 15	(8)
 16	Crimson Heights Health & Wellness (Medical & Radiology)
 17	Crimson Heights Health & Wellness (Billing)
 18	Memorial Hermann Health System (Medical)
 19	Memorial Hermann Health System (Billing)
 20	Memorial Hermann Health System (Radiology)
 21	Texas ENT Specialists (Medical)
 22	Texas ENT Specialists (Billing)
 23	Texas ENT Specialists (Radiology)
24	Strategic Wound Care (Medical)
25	Strategic Wound Care (Billing)
 26	CHI St. Luke's Health - The Woodlands Hospital (Medical)
27	CHI St. Luke's Health - The Woodlands Hospital (Billing)
28	CHI St. Luke's Health - The Woodlands Hospital (Radiology)
29	Texas Surgical Dermatology (Medical)
 30	Texas Surgical Dermatology (Billing)
 31	IPR Healthcare System, Inc. (Medical)
 32	IPR Healthcare System, Inc. (Billing)
 33	Pinard Home Health (Medical)
 34	Pinard Home Health (Billing)
 35	HarmonyCares Medical Group (Medical)
 36	HarmonyCares Medical Group (Billing)
 37	HarmonyCares Medical Group (Radiology)

	38	B Wound Evolution Wound Care & Hyperbaric Medicine (Medical)						
	39	Wound Evolution Wound Care & Hyperbaric Medicine (Billing)						
	40	UTMB Health (Medical)						
		UTMB Health C/O Document Access Services (Billing)						
	42	UTMB Health (Radiology)						
	43	Baylor College of Medicine (Medical)						
		Baylor College of Medicine (Billing)						
		Baylor College of Medicine (Radiology)						
		Houston Methodist Hospital (Medical)						
	47 Houston Methodist Hospital c/o Document Access Services (Billing)							
	48 Houston Methodist Hospital (Radiology)							
	49 Houston Cardiovascular Associates (Medical)							
		Houston Cardiovascular Associates (Billing)						
		Nexus Neurorecovery Center (Medical & Radiology)						
		Nexus Neurorecovery Center (Billing)						
	33	Harris County Sheriff's Office (Police report)						
Harris Count	y, Te 11 11	DO AGREE TO WAIVE THE NOTICE PERIOD. DO NOT AGREE TO WAIVE THE NOTICE PERIOD.						
		Atttorney Signature						
		Attorney Name						
		Firm Name						

Please Return To: Liberty Litigation Support LLC

7171 Highway 6 North, Suite 250

Houston, TX 77095

(281) 200-5320 or (281) 200-5310 Fax (713) 533-8997

Email: records@libertylitsupport.com

NOTE: RETURN OF THIS FORM IS REQUIRED WITHIN TWENTY (20) DAYS TO PROCESS YOUR REQUEST. ANY CANCELLATION OF THE ABOVE MUST BE IN WRITING. IF THE RECORDS HAVE ALREADY BEEN COPIED AND FEES INCURRED, THEN BILLING WILL BE PRORATED ACCORDINGLY.

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 77464528

Filing Code Description: No Fee Documents

Filing Description: Notice of Intention to Take Deposition by Written

Questions

Status as of 7/12/2023 4:50 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Tommy Hastings		tommy@hastingsfirm.com	7/12/2023 4:44:13 PM	SENT
Sam A. Houston		shouston@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Sam A. Houston		shouston@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Cari Collins		ccollins@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Cari Collins		ccollins@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Cynthia L. Freeman		cfreeman@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Cynthia L. Freeman		cfreeman@schlawyers.com	7/12/2023 4:44:13 PM	SENT
Gerald Castillo		gcastillo@serpeandrews.com	7/12/2023 4:44:13 PM	SENT
Amanda Johnson		ajohnson@serpeandrews.com	7/12/2023 4:44:13 PM	SENT
Madison Addicks		maddicks@serpeandrews.com	7/12/2023 4:44:13 PM	SENT