

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
Fort Lauderdale Division
www.flsb.uscourts.gov

In re:

COMPREHENSIVE CLINICAL
DEVELOPMENT, INC.,

Case No. 13-17273-JKO

COMPREHENSIVE CLINICAL
DEVELOPMENT NW, INC.,

Case No. 13-17282-JKO

Debtors.

Chapter 7
(Jointly Administered)

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NOTICE OF RULE 2004 EXAMINATION (DUCES TECUM)
(Production of Documents)

MARC P. BARMAT, TRUSTEE, by and through the undersigned attorney, requests that the Records Custodian of Alexian Brothers Behavioral Health Hospital, produce the documents set forth on the attached schedule on May 1, 2014 at 10:00 A.M., at the offices of Furr & Cohen, P.A., 2255 Glades Road, Suite 337W, Boca Raton, FL 33431, (561) 395-0500.

If the examinee receives this notice less than 7 days prior to the scheduled examination date (or less than 10 days if examination is taking place outside of Florida), the return date will be rescheduled upon timely request to a mutually agreeable time.

The request is made pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1. The scope of this request is within that described in Bankruptcy Rule 2004. Pursuant to Local Rule 2004-1 no order shall be necessary.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished in the manner stated this 15th day of April 2014, to those enumerated below.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in the this Court set forth in Local Rule 2090-1(A).

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**SCHEDULE TO NOTICE OF RULE 2004 EXAMINATION DUCES TECUM
DEFINITIONS AND INSTRUCTIONS**

A. As used in this Subpoena, the following words shall have their common meanings and shall include the meanings indicated:

1. The term “document” as used herein shall be defined in its broadest sense and shall refer to all written, printed, recorded, electronic or graphic matter, however produced or reproduced, of every kind and description, including but not limited to photographs, objects, tangible things, correspondence, telegraphs, memoranda, inter-office communications, records, report studies, surveys, contracts, licenses, agreements, ledgers, books of account, summaries, computer printouts and other computer materials, transcripts, analyses, proposals, legal pleadings, deeds, mortgages, bills of sale, security agreements, legal documents, account records, vouchers, records of inter-bank transfers of funds, bank checks, cashier’s checks, invoices, drafts, deposit slips, charge slips, cashier’s checks, invoices, drafts, deposit slips, charge slips, receipts, check stubs, bills, freight bills, bills of lading, working papers or drafts, statistical records, notebooks, calendars, appointment books, diaries, agendas, time sheets, logs, bids, estimates, job or transaction files, credit reports, notations, notes, sound records of any type, minutes of directors’ or other meetings, phone-records or tape recordings or other data compilations from which information can be obtained, any transactions thereof, bulletins, circulars, press releases, notices, instructions, advertisements, work assignments, motion picture films, videotapes, kinescopes, research or other articles and treatises, including all attachments and enclosures thereto.

2. The term “communication” includes all written, printed, electronic and oral communications, direct or indirect, by any means.

3. The term “relating to” includes referring to, corresponding to, concerning, connected with, regarding, discussing, analyzing, showing, describing, reflecting, implying and/or constituting.

4. The term “debtor” shall mean COMPREHENSIVE CLINICAL DEVELOPMENT, INC., and/or COMPREHENSIVE CLINICAL DEVELOPMENT, NW, INC., whether individually or in some other capacity, or whether jointly with another person; as well as any other person acting for the benefit of on behalf of COMPREHENSIVE CLINICAL DEVELOPMENT, INC., and/or COMPREHENSIVE CLINICAL DEVELOPMENT, NW, INC..

B. The relevant time period for this request is the last 3 year(s) preceding the date of this request, up to and including the date of the production of the documents by you.

C. You are instructed to produce all documents and things in your possession, custody or control as requested herein. Documents and things shall be produced in their original form, and shall include all copies of the originals which are in your possession, custody and control, as well. An item is within your “possession, custody or control” if you have physical possession of the item or can obtain the item from a third person.

D. Compliance with this request requires that you engage a reasonable search and inquiry for the items requested. If, after conducting a reasonable search, an item cannot be located for production, then in your written response to this request (i) describe the efforts made by you to obtain the item; (ii) state the present location of the item and (iii) identify the person(s) having physical custody or control of the item.

E. If you are claiming that the production of any document or item requested herein cannot occur because of the applicability of a privilege, then in your written response to this request (i) identify the documents or item, and (ii) state briefly the basis for the claim of privilege.

SCHEDULE "A"
DOCUMENTS TO BE PRODUCED

1. Copies of any and all leases or contracts with the Debtor.
2. Copies of any and all invoices sent to the Debtor.
3. Copies of any and all bank statements demonstrating the receipt of funds by the Debtor.
4. All documents demonstrating any value given to the Debtor from December 31, 2012 through March 29, 2013.