

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**IN RE:**

**RALEIGH ANESTHESIA ASSOCIATES, INC.**

**Case No. 06-50010  
Chapter 11**

**Debtor.**

**DISCOVERY PURSUANT TO RULES 7003 AND 7034  
OF THE BANKRUPTCY RULES OF PROCEDURE**

**TO:** Janet Smith Holbrook, Esquire  
Counsel for Raleigh General Hospital  
P.O. Box 2185  
Huntington, WV 25722-2185

Comes now Raleigh Anesthesia Associates, Inc. by counsel, Joseph W. Caldwell and John T. Miesner, and pursuant to Rules 7033 and 7034 of the Bankruptcy Rules of Procedure, request that Raleigh General Hospital respond to the following discovery requests.

1. Specify all instances of the failure of Raleigh Anesthesia Associates, Inc. to provide adequate physician coverage and supervision in connection with the Professional Services Agreement for the time period since January 1, 2006.
2. Identify all occasions where Raleigh Anesthesia Associates, Inc. requested modification of the Professional Services Agreement with Raleigh General Hospital in connection with the use of certified registered nurse anaesthetists.
3. State the average amount of reimbursement of certified registered nurse anaesthetists by Raleigh General Hospital to Raleigh Anesthesia Associates, Inc. for the period January 1, 2005, through February 28, 2006.
4. State the amount of the stipend for certified registered nurse anaesthetists paid by Raleigh General Hospital to Raleigh Anesthesia Associates, Inc. for certified registered nurse

anaesthetists as of November 1, 2002, to February 1, 2006.

5. Identify all persons who you will call to testify at the contested hearing on this matter.

RALEIGH ANESTHESIA ASSOCIATES, INC.

By Counsel

Presented by:

/s/ Joseph W. Caldwell  
Joseph W. Caldwell, Esquire  
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John T. Miesner, Esquire  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the attached **DISCOVERY PURSUANT TO RULES 7003 AND 7034 OF THE BANKRUPTCY RULES OF PROCEDURE** was served electronically upon the following: [ustpregion04.ct.ecf@usdoj.gov](mailto:ustpregion04.ct.ecf@usdoj.gov) - Office of the U.S. Trustee, on this 26<sup>th</sup> day of April, 2006.

Janet Smith Holbrook, Esquire  
Counsel for Raleigh General Hospital  
P.O. Box 2185  
Huntington, WV 25722-2185

/s/ Joseph W. Caldwell  
Joseph W. Caldwell