Examples of RTP to a Doctor:

1. Any and all written documents, including contracts, entered into between Karwal Healthcare, P.A. and any employee, professional association, corporation, partnership, proprietorship, joint venture, or any other legal entity that may have been associated with, as to the delivery of patient care and services during August 2016.
2. Please provide a copy of any and all written documents, including contracts, which pertain to Karwal Healthcare, P.A. and any employee, professional association, corporation, partnership, proprietorship, etc. that may have been providing care to patients at Westside Regional Medical Center in August 2016.
3. Any and all contracts between Westside Regional Medical Center and Karwal Healthcare, P.A. which were in effect in August 2016.

RTP to a Hospital:

1. Please provide a complete and legible photocopy of all policies, by-laws, rules and regulations concerning the medical staff of Westside Regional Medical Center in effect between January 1, 2016 and December 31, 2016.

4. Any and all written documents, including contracts, entered into between and Dr. Rahul Karwal and any employer, professional association, corporation, partnership, proprietorship, joint venture, or any other legal entity that may have been associated with, as to the delivery of patient care and services in on August 2016.
5. Please provide a copy of any and all written documents, including contracts, which pertain to Dr. Rahul Karwal and any employer, professional association, corporation, partnership, proprietorship, etc. that may have been providing care to patients at Westside Regional Medical Center in August 2016.
6. Any and all contracts between Westside Regional Medical Center and Dr. Rahul Karwal which were in effect in August 2016.

7. The entire advertising file for all advertising and/or marketing promotions done by or on the behalf of Westside Regional Medical Center, including all ads, brochures, videotapes, articles, etc. from August 2015 to August 2016.
8. All advertising videotapes, articles, public service announcements, brochures, advertisements, and all promotions done by or on behalf of Westside Regional Medical Center from August 2015 to August 2016.
9. Any and all literature, brochures, leaflets, pamphlets and/or other documentation circulated and/or available to the general public which advertised or promoted the emergency department services provided by Westside Regional Medical Center from August 2015 to August 2016.
10. Photographs or photocopies of any and all signs, or any other forms of communication, that you contend should have placed Alicia Costoya on notice that Dr. Rahul Karwal was not an employee or agent of the hospital at all times material hereto.