UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY BOWLING GREEN DIVISION CASE NO. 1:21-CV-00050-GNS

ELECTRONICALLY FILED

ESTATEOF JEREMY MARR, by and through its Administrator, JOANNA MARR, et al.

PLAINTIFFS

V. NOTICE OF INTENT TO OBTAIN MEDICAL RECORDS VIA SUBPOENA DUCES TECUM

CITY OF GLASGOW, et al.

DEFENDANTS

In accordance with the Health Information Portability and Accountability Act (HIPAA) Privacy Regulations, 45 CFR § 164.512(e), please take notice that the following records regarding JEREMY MARR will be requested via subpoena duces tecum:

Office of the Barren County Coroner 117-3A N. Public Square Glasgow, KY 42141

TJ Samson Community Hospital 1301 N. Race Street Glasgow, KY 42141

The Medical Center at Scottsville 456 Burnley Road Scottsville, KY 42164

LifeSkills 380 Suwannee Trail Street Bowling Green, KY 42103

Greenview Regional Hospital 1801 Ashley Circle Bowling Green, KY 42104

Graves Gilbert Clinic 201 Park Street Bowling Green, KY 42101 Office of the Chief Medical Examiner 10511 LaGrange Road

Louisville, KY 40223

Barren-Metcalfe EMS 703 E. Main Street Glasgow, KY 4214

The Medical Center at Bowling Green 250 Park Street Bowling Green, KY 42101

Med Center Health Primary Care -Scottsville 466 Burnley Road Scottsville, KY 42164

Medical Center Urgentcare 291 New Towne Drive Bowling Green, KY 42103 This request includes all office notes, inpatient records, outpatient records, EMS records, labs, reports, diagnostic testing, radiology, pharmacy records, any and all mental health/psychiatric treatment and/or counseling, rehabilitation records, pathology, autopsy, toxicology, and any and all other records, photographs, and/or documentation with regard to JEREMY MARR.

Please take notice that the parties have until the close of business on Friday, July 22, 2022 in which to file an objection with the Court or otherwise notify the undersigned counsel of its objection to this Notice of Intent. If the undersigned counsel is not notified by the above date, the undersigned will move forward and notice the deposition of the records custodian of the above-referenced provider and subpoena JEREMY MARR's records from same. A copy of this Notice will be sent to each provider along with the subpoena as satisfactory assurance that all parties have been placed on notice and afforded an opportunity to object to the subpoena. Should an objection be made, the party making the objection is requested to send that objection directly to the provider listed above with a copy to all counsel of record.

All records and information received will be forwarded to all parties at their request and at their own expense.

This 15th day of July, 2022.

KERRICK BACHERT, PSC 1025 State Street Bowling Green, KY 42101 T: (270)782-8160 F: (270) 782-5856 tkerrick@kerricklaw.com mcook@kerricklaw.com

/s/ Matthew P. Cook
Thomas N. Kerrick
Matthew P. Cook
Counsel for Defendants

CERTIFICATE OF SERVICE

This will certify that a true and exact copy of the foregoing was this 15th day of July, 2022, filed electronically and forwarded via the CM/ECF efiling system to the following:

David F. Broderick
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Counsel for Plaintiffs

/s/ Matthew P. Cook
Counsel for Defendants