

Exhibit 4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

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STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Plaintiff,

Case No. 2:14-cv-11700

v.

POINTE PHYSICAL THERAPY LLC,
NEW ERA PHYSICAL THERAPY, P.C.,
NEW ERA PT SERVICES, INC.,
RAM GUNABALAN, M.D.,
SHERIF EL-SAYED,
AMALE BAZZI A/K/A AMANDA BAZZI,
MICHIGAN VISITING PHYSICIANS, PC
D/B/A CHOICE HOUSE CALL,
MUNDY PAIN CLINIC P.C.,
MEDICAL EVALUATIONS P.C.,
MARTIN QUIROGA, D.O.,
ANDREW RUDEN, M.D.,
JAMES BEALE JR., M.D.,
SEAN JOHN HOBAN, M.D., and
BIO-MAGNETIC RESONANCE, INC.,

Hon. Paul D. Borman

Magistrate Judge Michael J.
Hluchaniuk

Defendants.
-----X

**STATE FARM'S FIRST SET OF DOCUMENT REQUESTS
TO DEFENDANT POINTE PHYSICAL THERAPY LLC**

Plaintiff State Farm Mutual Automobile Insurance Company (“State Farm”), by its counsel and pursuant to Federal Rule of Civil Procedure 34, hereby requests that Defendant Pointe Physical Therapy LLC respond to the following requests for production and produce the documents and things described herein for inspection and copying at the office of Thomas Cranmer, Miller Canfield, 840 W. Long Lake Road, Suite 200, Troy, Michigan 48098, within thirty (30) days of service hereof.

DEFINITIONS

1. “You” and “Your” shall mean Defendant Pointe Physical Therapy LLC, and any

d/b/a or variation of its name, as well as its employees, agents, or any other person or entity acting on its behalf.

2. The term “document” or “documents” shall mean every original (and every copy of any original or copy which differs in any way from any original), every writing or recording of every kind or description, whether handwritten, typed, drawn, sketched, printed, computerized or recorded by any mechanical, electronic or electrical means whatsoever, including without limitation books, records, papers, letters, instructions, pamphlets, brochures, circulars, advertisements, specifications, blueprints, maps, plats, surveys, drawings, sketches, graphs, charts, plans, reports, correspondence, e-mails, faxes, communications, memoranda, notes, notebooks, lists, analyses, financial statements, bank statements, deposit tickets, cancelled checks, wire transfers, solicitations, PowerPoint presentations, charts, minutes, calendars, appointment books, itineraries, cancelled checks, vouchers, receipts, contracts, agreements, invoices, written memorials of oral communications, photographs, films, video tapes, audio tapes, recordings and compilations of data or other information, including any compilations from which information can be obtained. The term “document” or “documents” shall have the broadest meaning possible consistent with the terms of the Federal Rules of Civil Procedure.

3. The term “communication” or “communications” means all discussions, conversations, meetings, conferences, telephone conversations, interviews, negotiations, agreements, understandings, cards, letters, correspondence, telegrams, telexes, facsimiles, electronic mail, voicemail, or other forms of written or verbal interchange, however transmitted or stored, including reports, notes, memoranda, lists, agenda and other records of any communications.

4. The terms “payment” or “payments” mean any transfer of money or anything of

value.

5. The term “Defendant” or “Defendants” means defendants Pointe Physical Therapy LLC, New Era Physical Therapy, P.C., New Era PT Services, Inc., Michigan Visiting Physicians PC d/b/a Choice House Call, Mundy Pain Clinic P.C., Medical Evaluations P.C., Ram Gunabalan, M.D., Martin Quiroga, D.O., Andrew Ruden, M.D., James Beale Jr., M.D., Sean John Hoban, M.D., Bio-Magnetic Resonance, Inc., Sherif El-Sayed, and/or Amale Bazzi a/k/a Amanda Bazzi, and any employee, agent or other person or entity acting on their behalf.

6. The term “Relevant Person” or “Relevant Persons” means the following individuals or anyone acting on their behalf:

- a) Emilitza Arias
- b) Raymond Arias
- c) Dr. Zakiya Autoine
- d) Dr. M. Shakeel Awaisi
- e) Yousef Bakri
- f) Nesreen Bazzi
- g) Dr. Jack Belen
- h) Dr. Mark Brennan
- i) Vincent Celentano
- j) Fatmeh Chebab (“Faye”)
- k) Dr. Abelardo Contreras
- l) Antonio Delara
- m) Joseph DeSanto
- n) Sarah Vidican DeSanto
- o) Dr. John Fow
- p) Kevin Geer
- q) Rebecca Higgins
- r) Dr. Nazih Iskander
- s) Alex Jacobson
- t) Dr. Nidal Jboor
- u) Gigi John
- v) Luis Jorge a/k/a Luise George
- w) Vinod Joshi
- x) Dr. Irwin Lutwin
- y) Dr. Joel Milliner
- z) Hala Moussa f/k/a Hala Makki
- aa) Dr. Paul Petre
- bb) Ron Punzio

- cc) Dr. Syed Raoof
- dd) Muhammad Raza
- ee) Scott Reizen
- ff) Dr. Terry Reznick
- gg) Warren Ringold
- hh) Megan Rutledge
- ii) Dr. Byron Schoolfield
- jj) Richard Schwab
- kk) Matthew Schwartz
- ll) Fred Schwarze

7. The term “Relevant Entity” or “Relevant Entities” means the following entities as well as their owners, officers, directors, members, partners, employees, agents, independent contractors, or anyone acting on their behalf:

- a) Affiliated Diagnostics of Oakland
- b) Affiliated Medical of Dearborn
- c) American Wholesale Pharmaceuticals Inc.
- d) CareFirst Occupational & Rehab
- e) Elite Wellness, LLC
- f) Flint Wellness & Diagnostic Center, PLLC
- g) Get Well Medical Transport Co. a/k/a GETWELL Medical Transport
- h) Global Medical Billing, Inc.
- i) Greater Michigan Professional Services LLC d/b/a MI Pro Consultants
- j) Insight Diagnostics, LLC
- k) LegalGenius, PLLC
- l) Maple Millennium Medical Center, L.L.C.
- m) Michigan BioTech Partners LLC (assumed name, The Imaging Center)
- n) MRI Consultants LLC
- o) Orthopedic Surgeons, P.C.
- p) Perfect Management, Inc.
- q) PET Consultants, Inc.
- r) Pinnacle Medical Services, P.C.
- s) Quick Health Care Billing, Inc.
- t) R. Gunabalan, Inc.
- u) Ravid & Associates, P.C.
- v) Reifman Law Firm
- w) Sinai Diagnostics Services PLLC
- x) The Law Office of Kevin Geer
- y) The Law Offices of Joumana Kayrouz, PLLC
- z) The Reizen Law Group
- aa) Transport Us, LLC
- bb) Vital Community Care, P.C.
- cc) WCIS Media, LLC

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