

**STAHL & DeLAURENTIS, P.C.**

**BY:** John A. Talvacchia, Esq.

**ATTY I.D. #:** 016011992

10 E. CLEMENTS BRIDGE ROAD  
RUNNEMEDE, NEW JERSEY 08078  
(856) 380-9200

ATTORNEY FOR Defendants, Natalia Rezvina,  
MD and Somers Manor Obstetrics and  
Gynecology a Division of Regional Women's  
Health Group, LLC incorrectly pled as Somers  
Manor Obstetrics and Gynecology and/or  
Regional Women's Health Management, LLC  
and/or Somers Manor Obstetrics and  
Gynecology, A Division of Regional Women's  
Health Group, LLC

*Plaintiff*

LINDSAY SWITZER; JOSEPH SWITZER

vs.

*Defendant*

NATALIA REZVINA; SOMERS MANOR  
OBSTETRICS AND GYNECOLOGY and/or  
REGIONAL WOMEN'S HEALTH  
MANAGEMENT, LLC and/or SOMERS  
MANOR OBSTETRICS AND GYNECOLOGY  
A DIVISION OF REGIONAL WOMEN'S  
HEALTH GROUP LLC

SUPERIOR COURT OF NEW JERSEY

ATLANTIC COUNTY

Docket No. L-3697-14

CIVIL ACTION

**FORM C. UNIFORM INTERROGATORIES TO BE ANSWERED BY DEFENDANT  
IN ALL PERSONAL INJURY CASES: SUPERIOR COURT**

1. State: (a) the full name and residence address of each defendant; (b) if a corporation, the exact corporate name; and (c) if a partnership, the exact partnership name and the full name and residence address of each partner.

**Somers Manor Obstetrics and Gynecology, A Division of Regional Women's Health Group, LLC, 599 Shore Road, Suite 101, Somers Point, New Jersey 08244.**

2. Describe in detail your version of the accident or occurrence in detail setting forth the date, location, time and weather.

**Upon advice of counsel, objection to form. This interrogatory is overly broad in the context of this medical malpractice action. However, without waiving said objection, please be advised that answering defendant as an entity, relies upon the medical records produced in this matter. In addition, please see e-mail correspondence between plaintiff, Lindsay Switzer and Dr. Korzeniowski dated June 25, 2013; June 26, 2013; August 28, 2013; September 1, 2013; September 6, 2013; September 24, 2013 and September 29, 2013.**

**In addition, upon advice of counsel, plaintiffs are already in receipt of all of the letters between plaintiffs and Somers Manor OB/GYN.**

3. If you intend to set up or plead or have set up or pleaded negligence or any other separate defense as to the plaintiff or if you have or intend to set up a counterclaim or third-party action, (a) state the facts upon which you intend to predicate such defenses, counterclaim or third-party action; and (b) identify a copy of every document relating to such facts.

**Answering defendant intends to rely upon any and all documents produced during the course of discovery in the defense of this action as well as any and all testimony.**

4. State the names and addresses of all persons who have knowledge of any relevant facts relating to the case.

**Upon advice of counsel, any and all parties, their families, agents, servants and employees, any and all expert witnesses, or any other persons whose names are revealed during the course of discovery who may have knowledge of or been a witness to the incident/occurrence at issue in this case. By way of further response, Jamie Sosa, CNM, Giovanna LoPressti, RNC, BSN, Dr. Michael Bravoco, Dr. Philip Korzeniowski, Colleen Halliday Pham, CNM, Donna Melle, CNM, Danielle Faul, CNM, Diane Maclean, Laura Ann Nagy, Lisa Lovett, RN, Louis Burgess, MD, Asuncion Cicerone, MD, Thomas Kay, MD, Tracey Ponzio, RN, Sue Humphries, RN and Dr. Kay Ghaben and any and all other medical providers identified in the medical records produced during discovery in this matter.**

5. State (a) the name and address of any person who has made a statement regarding this lawsuit; (b) whether the statement was oral or in writing; (c) the date the statement was made; (d) the name and address of the person to whom the statement was made; (e) the name and address of each person present when the statement was made; and (f) the name and address of each person who had knowledge of the statement.

Unless subject to a claim of privilege, which must be specified: (g) attach a copy of the statement, if it is in writing; (h) if the statement was oral, state whether a recording was made and, if so, set forth the nature of the recording and the name and address of the person who has custody

of it; and (i) if the statement was oral and no recording was made, provide a detailed summary of its contents.

**Yes. Upon advice of counsel, statements have been produced in response to peer review inquiries which are privileged. Letters have been produced to the New Jersey State Board of Medical Examiners. The New Jersey Board of Medical Examiners found upon review that there was no basis to initiate any action. That letter was dated March 4, 2014 and a letter dated November 25, 2013. There is also a letter of November 20, 2013 from Giovanna LoPressti, RNC to the State Board of Medical Examiners detailing her involvement as a labor and delivery nurse, as well as a letter from Dr. Rezvina to plaintiff, Lindsay Switzer dated September 16, 2013 and a note of Diane Maclean dated September 11, 2013 in regard to her witnessing the conversation between Ms. Switzer and Dr. Rezvina on August 2, 2013. We are also in possession of letters from Ms. Switzer to Doctors Bravoco and yourself dated August 27, 2013, as well as June 24, 2013. Further, upon advice of counsel, answering defendant is in receipt of a letter from Dr. Thomas Kay to plaintiff, Lindsay Switzer dated September 23, 2013, as well as letters from Charles Roach, MD dated November 4, 2013 and William Roeder dated March 11, 2014, as well as November 7, 2013 for which answering defendant, upon advice of counsel, claims are subject to the peer review privilege.**

**In addition, please see e-mail correspondence referenced in Interrogatory No. 2 of Form C.**

6. If you claim that the plaintiff made any statements or admissions as to the subject matter of this lawsuit, state: (a) the date made; (b) the name of the person by whom made; (c) the name and address of the person to whom made; (d) where made; (e) the name and address of each person present at the time the admission was made; (f) the contents of the admission; and (g) if in writing, attach a copy.

**None other than that which is contained in the letters referenced above and in the medical records.**

7. If you contend that the plaintiff's damages were caused or contributed to by the negligence of any other person, set forth the name and address of the other person and the facts upon which you will rely in establishing that negligence.

**Investigation pending. By way of further response, please see answer to #3.**

8. State the names and addresses of all eye witnesses to the accident or occurrence, their relationship to you and their interest in this lawsuit.

**Please see #4.**

9. If any photographs, videotapes, audio tapes or other forms of electronic recording, sketches, reproductions, charts or maps were made with respect to anything that is relevant to the subject matter of the complaint, describe: (a) the number of each; (b) what each shows or contains; (c) the date taken or made; (d) the names and addresses of the persons who made them; (e) in whose possession they are at present and (f) if in your possession, attach a copy, or if not subject to convenient copying, state the location where inspection and copying may take place.

**None in answering defendant's possession**

10. State the names and addresses of any and all proposed expert witnesses. Set forth in detail the qualifications of each expert named and attach a copy of each expert's current resume. Also attach true copies of all written reports provided to you by any such proposed expert witnesses.

With respect to all expert witnesses, including treating physicians, who are expected to testify at trial, and with respect to any person who has conducted an examination pursuant to Rule 4:19, state each such witness's name, address and area of expertise and attach a true copy of all written reports provided to you. If a report is not written, supply a summary of any oral report provided to you. State the subject matter on which your experts are expected to testify. State the substance of the facts and opinions to which your experts are expected to testify and provide a summary of the factual grounds for each opinion.

**To be provided upon receipt of plaintiff's expert reports and in accordance with our court rules and/or case management orders.**

11. If you contend or intend to contend at the time of trial that the plaintiff sustained personal injuries in any prior or subsequent accident, state (a) the date of said accident; (b) the injuries you contend that plaintiff sustained; (c) the parties involved in said accident; (d) the source from which you obtained the information; and (e) attach a copy of any written documents regarding this information.

**Investigation pending. By way of further response, please see answer to interrogatory #4.**

12. If you intend to rely on any statute, rule, regulation or ordinance, state the exact title and section.

**N.J.S.A. 2A:53A-26 et seq. and N.J.S.A. 2A:53A-40 et seq.**

13. Pursuant to R. 4:10-2(b), state whether there are any insurance agreements including excess policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment that may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. YES (  ) NO (  ).

If the answer is "yes", attach a copy of each insurance agreement or policy, or in the alternative state: (a) number; (b) name and address of insurer or issuer; (c) inception and expiration dates; (d) names and addresses of all person insured thereunder; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; and (i) where and when each policy or agreement can be inspected and copied.

**Upon advice of counsel, answering defendant is insured through a policy of insurance issued by MDAdvantage Insurance Company.**

**Policy No.: 5-GRP5505700**

**Policy Limits: \$1 million per occurrence**

14. Identify all documents that may relate to this action, and attach copies of each such document.

**Upon advice of counsel, please see medical records of Somers Manor Obstetrics and Gynecology already provided. Also, plaintiff will be copied on subpoenas for all medical records in this matter. Upon receipt of reasonable photocopying charges, plaintiff will be provided with copies of all medical records received via subpoena. Answering defendant reserves the right to rely upon all documents received and identified during the course of discovery in this matter.**

15. State whether you have ever been convicted of a crime.

YES ( )

NO (X).

If the answer is "yes", state (a) date; (b) place; and (c) nature.

File No. 17109

**CERTIFICATION**

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I hereby certify that the copies of the documents annexed hereto are exact copies of those correspondence provide by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.



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**Philip A. Korzeniowski, MD**

On Jun 25, 2013, at 8:57 PM, Philip Korzeniowski <[PKorzeniowski@rwhm.org](mailto:PKorzeniowski@rwhm.org)> wrote:

Yes, thank you I got your email.

Phil Korzeniowski

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**From:** Lindsay Scarborough Switzer [[lindsayswitzer@gmail.com](mailto:lindsayswitzer@gmail.com)]

**Sent:** Tuesday, June 25, 2013 1:35 PM

**To:** Philip Korzeniowski

**Subject:** Can you please confirm you got my email?

Thanks.  
Lindsay

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**From:** Gmail [lindsayswitzer@gmail.com]  
**Sent:** Wednesday, June 26, 2013 9:38 AM  
**To:** Philip Korzenowski  
**Subject:** Re: Can you please confirm you got my email?

Great. And for what it's worth, my doula, Jodi Green is available if you want to confirm anything, and the labor nurse was Gia Lopresti. Also, Jamie was a fantastic support during my labor. I saw her several times during my pregnancy and she's a wonderful midwife.



**From:** Lindsay Scarborough Switzer [[lindsayswitzer@gmail.com](mailto:lindsayswitzer@gmail.com)]  
**Sent:** Wednesday, August 28, 2013 9:43 PM  
**To:** Philip Korzeniowski  
**Subject:** Follow up letter

Dr. Korzeniowski,

I had to let my thoughts marinate for a while before I wrote this down, but I wanted to follow up with you after my meeting with Dr. Rezvina.

Very truly yours,

Lindsay Switzer

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On Sun, Sep 1, 2013 at 3:28 PM, Philip Korzeniowski <[PKorzeniowski@rwhm.org](mailto:PKorzeniowski@rwhm.org)> wrote:  
Lindsay,

Thank you for sharing your thoughts and feelings. I understand how painful this experience has been for you. On behalf of Somers Manor I would again like to apologize. I certainly wish I could erase those memories for you or make this better. I hope you and your family have a nice holiday weekend.

Very Truly Yours,

Dr. Korzeniowski

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**From:** Lindsay Scarborough Switzer [lindsayswitzer@gmail.com]  
**Sent:** Friday, September 06, 2013 10:08 PM  
**To:** Philip Korzeniowski  
**Subject:** Re: Follow up letter

Believe me, I'm trying very hard to get over this and I'm embarrassed that I can't. This isn't like me. Before this I would have been right there with the "healthy baby is all the matters" line. Everytime I look down, or my scar hurts, I'm right back at the hospital. It's been three months and I'm realizing that scar isn't going anywhere. I have an appointment with a counselor. The fact that this practice supports her behavior just reminds me that this is a business and I'm collateral damage.

On Tue, Sep 24, 2013 at 11:00 AM, Melinda Curtis  
<MCurtis@rwhm.org<mailto:MCurtis@rwhm.org>> wrote:

Dear Ms. Switzer,

We have received your communications regarding your experience with Dr. Rezvina. Please see our attached response as well as a signed apology from Dr. Rezvina. Both documents were mailed to your home yesterday as well. Feel free to reach out to me with any questions or concerns.

Sincerely,

Melinda Curtis

Director of Human Resources

Regional Women's Health Management, LLC

227 Laurel Road, Echelon One, Suite 300, Voorhees, NJ 08043

Phone: 856.669.6050 ext. 2008<tel:856.669.6050%20ext.%202008> I Cell:

856.340.6168<tel:856.340.6168> Private Fax: 856.669.6031<tel:856.669.6031> I

mcurtis@rwhm.org<mailto:mcurtis@rwhm.org>

From: Lindsay Scarborough Switzer [lindsayswitzer@gmail.com]  
Sent: Sunday, September 29, 2013 10:51 PM  
To: Melinda Curtis; Natalia Rezvina  
Cc: Michael Bravoco; Philip Korzeniowski; Frank Caso; Thomas Kay  
Subject: Re: Your Recent Communications

Seriously?

Any claims to concerns about non-reassuring fetal tracing fall flat because she announced I needed a C-section the moment she walked in the room, before the late decelerations, before examining my cervix, and before even talking to me. Her schedule, then my insubordination, were her concerns and she resorted to threats and lies to get me into the OR. I hope any behavior modification classes include a refresher on informed consent. You have lost patients over this.