

NL

Internal
Memorandum

Date: January 3, 1986

To: Mr. W. Bronner

Unit: O. G. C. - New York

From: E. J. Eichen

Unit: NL CHEMICALS - Hightstown

Subject: ✓ R. McCULLOUGH vs. ALBERICO

RECEIVED

JAN 6 1986

W. R. BRONNER

Attached please find correspondence recently received on the
above-captioned case. Please advise us as to how we should
proceed.

Thank you for your assistance.

E. J. Eichen
E. J. Eichen

/k
Attach.

NL 000039593

N 26092



Medical Copy Services

1315 Walnut Street, Suite 1016 Philadelphia, Pennsylvania 19107 (215) 546-0334

October 21, 1985

TO: National Lead Industries/
Associated Lead Inc
2545 Aramingo Ave
Phila., PA

RE: MCS#180978, Robert McCullough

Dear Records Custodian:

Patricia Young, PMSLIC has asked that we obtain copies of certain records from you.

The records of which you are custodian have been requested by counsel for Defendant in the above lawsuit which is pending in the Court of Common Pleas of Philadelphia County. This request is being made pursuant to court regulation #390 which provides for the informal production of records where there is no objection by counsel and is an effort to save time and expense.

Although the attached records reproduction subpoena is not a formal subpoena, if for some reason you choose not to produce the records in the manner indicated on the attached records reproduction subpoena, a formal subpoena may be subsequently served requiring your personal appearance at an attorney's office to produce the records and authenticate them.

We look forward to obtaining the records in the manner indicated in the attached records reproduction subpoena.

Shore Shugart
MCS REPRESENTATIVE

Enclosure

NL 000039594

Pennsylvania • New York • Delaware • Virginia • Maryland
Washington, D.C. • Connecticut • New Jersey

N 26092.01

RECORDS REPRODUCTION SUBPOENA

Robert McCullough
vs
Alberico, MD

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA
August TERM, 19 85
NO. 3253

TO: CUSTODIAN OF RECORDS FOR
National Lead Ind/Assoc Lead, Inc

1. You are requested to produce

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment of Robert McCullough, Plaintiff; Address: 6534 N. 18th St, Phila., PA; as a patient up to and including the present.

2. YOU SHOULD PRODUCE THESE RECORDS ON OR BEFORE 11-15-85 BY:

- ☒ (XXXX) mailing the original records to Medical Copy Services where the originals will be copied and returned to you;
- ☐ () producing the original records at your office for reproduction at Medical Copy Services after which the originals will be returned to you;
- ☐ () bringing the original records to Medical Copy Services where they will be copied at that location and returned to you. DO NOT MAIL THE ORIGINAL RECORDS;
- ☐ () producing the original records at your office where the originals will be copied.
DO NOT MAIL THE ORIGINAL RECORDS.

Date: October 21, 1985

MEDICAL COPY SERVICES
1315 Walnut Street, Suite 1016
Philadelphia, PA 19107
(215) 546-0334

By: Alison Huagert

NL 000039595

N 26092.02

CERTIFICATION OF RECORD CUSTODIAN

I am the authorized Custodian of Records for National Lead Ind/Assoc Lead Inc
and I have the authority to certify the attached records of

Robert McCullough

Being duly sworn according to law, I hereby certify, depose and say that:

These records were reproduced in my presence or at my direction, these records were prepared in the ordinary course of business by authorized personnel on or about the time of the event or act, and a careful search for the records has been made by me or under my direction and produced in accordance with the attached subpoena duces tecum. Therefore these records constitute all the records of said individual described above.

I certify and declare that the above described facts are true and correct to the best of my personal knowledge. 

Comments: _____

Date: _____ Signature: _____

NL 000039596

N 26092.03