

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

DC MEDICAL MARKETING, LLC and)	
its successor-in-interest LIBERTY)	
WELLNESS SERVICES, LLC,)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 18-EV-005732-E
DUNWOODY LABS, INC., and)	
GEZ AGOLLI,)	
Defendants.)	
_____)	

CONSENT ORDER ON PLAINTIFFS' MOTION FOR SANCTIONS

Plaintiffs DC Medical Marketing, LLC, and its successor-in-interest, Liberty Wellness Services, LLC; as well as Defendants Dunwoody Labs, Inc., and Gez Agolli have submitted a Consent Agreement on Plaintiffs' Motion for Sanctions (filed November 4, 2019). The above-named Parties have jointly agreed:


1. Defendant Dunwoody Labs, Inc. shall supplement their document production to Plaintiffs no later than January 15, 2019. This shall include, but not be limited to, all documents requested in Plaintiffs' First Requests for Production of Documents, to be produced in their native file format.
2. The parties have also agreed Defendant Dunwoody Labs, Inc. shall produce the following documents to Plaintiffs by January 15, 2019:
 - a. all Explanation of Benefits ("EOBs") for any patients or specimens that were provided and/or referred to Dunwoody Labs, Inc. by Plaintiffs;
 - b. any and all documents or correspondence reflecting any billing performed for any patients or specimens that were provided and/or referred to Dunwoody Labs, Inc. by Plaintiffs;

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- c. any documents reflecting the identity of all billing staff who worked for Dunwoody Labs, Inc. from the time period during which Plaintiffs provided and/or referred any patients or specimens to Dunwoody Labs, Inc.; and
 - d. any and all bank statements or other such records that reflect any payments (incoming or outgoing) to Dunwoody Labs, Inc. for any patients or specimens provided and/or referred to Dunwoody Labs, Inc. by Plaintiffs.
3. Defendant Dunwoody Labs, Inc. shall produce a 30(b)(6) witness to continue its deposition if requested by the Plaintiffs no later than February 28, 2020.
 4. Defendant Gez Agolli shall be present for a deposition if requested by the Plaintiffs no later than March 31, 2020, and Plaintiffs may depose additional witnesses by such date.
 5. The Rule Nisi hearing scheduled for December 20, 2019, to hear the Plaintiffs' Motion for Sanctions is hereby continued until further order of the Court.

All parties must confer and submit a Proposed Joint Confidentiality Order protecting patient confidentiality no later than December 30, 2019.

SO ORDERED, this 18th day of December, 2019.



Judge Jane Morrison
State Court of Fulton County

Copies to counsel and pro se parties via E-File Georgia and/or First Class Mail.