Vazquez, Jesus

From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:14 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Labels HG0000523 - HG0000540.PDF; Bates Labels HG0000541 - HG0000543.PDF; Bates Labels HG0000544 - HG0000616.PDF; Bates Labels HG0000617 - HG0000629.PDF; Bates Labels HG0000630 - HG0000631.PDF; Bates Labels HG0000632 - HG0000656.PDF; Bates Labels HG0000657 - HG0000676.PDF; Bates Labels HG0000677 - HG0000702.PDF; Bates Labels HG0000703 - HG0000788.PDF; Bates Labels HG0000789 - HG0000824.PDF

David:

Attached are the documents responsive to RFP 1. More to follow.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

---

From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production

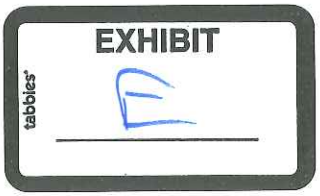
Jesus:

Following up on our call yesterday, we have received to date documents Bates labeled HG 0000001 - 0000514, 0974 - 1020, 1076 - 1089, and 1340 - 1350, but we have not received any of the other documents.

As indicated in your e-mail below, the zip file contained only 241 - 514, so the other documents were not in the zip file.

Please let us know what you find on your end regarding the documents that did not come through.

Regards,
David



Sills Cummis & Gross P.C.
website | v-Card | email
David C. Lee
Associate
New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

Scott,

Attached please find our cover letter regarding Health Grades' production of documents and copies of the documents referenced in the letter. The Section 3-2(b) documents (HG 0000241-0000514) are attached as a zip file.

Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:19 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Labels HG0000825 - HG0000842.PDF; Bates Labels HG0000843 - HG0000898.PDF; Bates Label HG0000899.PDF; Bates Labels HG0000900 - HG0000920.PDF; Bates Labels HG0000921 - HG0000937.PDF; Bates Labels HG0000938 - HG0000973.PDF; Bates Labels HG0001021 - HG0001033.PDF; Bates Labels HG0001034 - HG0001075.PDF

David:

Attached are the documents responsive to RFP 4. More to follow.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
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E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

---

From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production

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Regards,
David

Sills Cummis & Gross P.C. website v Card email
David C. Lee
Associate
New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

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Attached please find our cover letter regarding Health Grades' production of documents and copies of the documents referenced in the letter. The Section 3-2(b) documents (HG 0000241-0000514) are attached as a zip file.

Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:24 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Labels HG0001076 - HG0001089 REDACTED.PDF

David:

Attached are the documents responsive to RFP 6. More to follow.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
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E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production

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Regards,
David

Sills Cummis & Gross P.C.
website | vCard | email
David C. Lee
Associate
New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

Scott,

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Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
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1200 Seventeenth Street | Denver, CO 80202 |
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E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:27 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Labels HG0001090 - HG0001176.PDF; Bates Labels HG0001177 - HG0001178.PDF; Bates Labels HG0001179 - HG0001203 REDACTED.PDF

David:

Attached are the documents responsive to RFP 7 and RFP 8. More to follow.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

---

From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production

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website | v-Card | email
David C. Lee
Associate
New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

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Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
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E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:30 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Labels HG0001204 - HG0001205 REDACTED.PDF; Bates Labels HG0001206 - HG0001230.PDF; Bates Label HG0001231.PDF; Bates Labels HG0001232 - HG0001237.PDF; Bates Labels HG0001238 - HG0001339.PDF; Bates Labels HG0001340 - HG0001350 REDACTED.PDF

David:

Attached are the documents responsive to RFP 9, RFP 10, RFP 11 and RFP 12. More to follow.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production

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Regards,
David

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website | v-card | email
David C. Lee
Associate
New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

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Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Tuesday, August 02, 2011 5:34 PM
To: 'David C. Lee'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey; Scott D. Stimpson; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Subject: RE: HG Document Production
Attachments: Bates Label HG0001351.PDF; Bates Labels HG0001352 - HG0001381.PDF; Bates Labels HG0001382 - HG0001383.PDF

David:

Attached are the documents responsive to RFP 13, RFP 14 and RFP 15. That completes the production. Please let me know if you have any issues or concerns regarding the same.

Jesús M. Vázquez, Attorney-at-Law
Rothgerber Johnson & Lyons LLP | One Tabor Center, Suite 3000 |
1200 Seventeenth Street | Denver, CO 80202 |
Direct 303.628.9517 | Main 303.623.9000 | Fax 303.623.9222
E-mail: jvazquez@rothgerber.com | Website: www.rothgerber.com

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From: David C. Lee [mailto:dlee@sillscummis.com]
Sent: Tuesday, August 02, 2011 8:48 AM
To: Vazquez, Jesus
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Regards,
David

Sills Cummis & Gross P.C.

Website | vCard | email [redacted]

David C. Lee
Associate

New York | Map d (212) 500-1546 f (212) 643-6500 30 Rockefeller Plaza New York, NY 10112

From: Vazquez, Jesus [mailto:jvazquez@rothgerber.com]
Sent: Thursday, July 28, 2011 8:52 PM
To: Scott D. Stimpson; David C. Lee; Mark J. Rosenberg; 'lampley@wtotrial.com'; 'ridley@wtotrial.com'
Cc: Kostolansky, Kris J.; Phipps, Jeffrey
Subject: HG Document Production

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Regards, Jesus

Jesús M. Vázquez, Attorney-at-Law
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1200 Seventeenth Street | Denver, CO 80202 |
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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 12:31 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #19
Attachments: HG0001384 (00988444).PDF; HG0002109 (00988538).PDF; HG0002172 (00988539).PDF; HG0002241 (00988540).PDF; HG0001580 (00988453).PDF; HG0001664 (00988455).PDF; HG0002330 (00988541).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #19. Please treat documents bates numbered HG0001664 - HG0001693 and HG0002330 - HG0002362 as Attorney's Eyes Only.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 1:29 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #24 Email No. 1
Attachments: HG0002515 (00988432).PDF; HG0002546 (00988439).PDF; HG0002518 (00988433).PDF; HG0002530 (00988436).PDF; HG0002521 (00988434).PDF; HG0002541 (00988438).PDF; HG0002535 (00988437).PDF; HG0002525 (00988435).PDF; HG0002376 (00988545).PDF; HG0002105 (00988537).PDF; HG0002363 (00988543).PDF; HG0002432 (00988554).PDF; HG0002426 (00988553).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #24. Please treat all of these documents as Attorney's Eyes Only.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 1:39 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #24 Email No. 2
Attachments: HG0002468 (00988560).PDF; HG0002438 (00988555).PDF; HG0002443 (00988556).PDF; HG0002496 (00988429).PDF; HG0002486 (00988563).PDF; HG0002414 (00988551).PDF; HG0002480 (00988562).PDF; HG0002420 (00988552).PDF; HG0002455 (00988558).PDF; HG0002501 (00988430).PDF; HG0002473 (00988561).PDF; HG0002408 (00988550).PDF

Counsel:

Attached please find additional documents responsive to MDx's RFP #24. Please treat all of these documents as Attorney's Eyes Only.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 1:45 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #24 Email No. 3 of 3
Attachments: HG0002370 (00988544).PDF; HG0002383 (00988546).PDF; HG0002389 (00988547).PDF; HG0002395 (00988548).PDF; HG0002507 (00988431).PDF; HG0002461 (00988559).PDF; HG0002448 (00988557).PDF; HG0002492 (00988564).PDF; HG0002402 (00988549).PDF; HG0001447 (00988446).PDF

Counsel:

Attached please find the last batch of documents responsive to MDx's RFP #24. Please treat all of these documents as Attorney's Eyes Only.

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Vazquez, Jesus

From: Vazquez, Jesus

Sent: Wednesday, October 26, 2011 2:39 AM

To: 'Scott D. Stimpson'

Cc: David C. Lee

Subject: RFP #21 Email No. 1

Attachments: HG0001833 (00988464).PDF; HG0001852 (00988473).PDF; HG0001853 (00988474).PDF; HG0001854 (00988475).PDF; HG0001867 (00988481).PDF; HG0001869 (00988482).PDF; HG0001871 (00988483).PDF; HG0001885 (00988491).PDF; HG0001903 (00988498).PDF; HG0001905 (00988500).PDF; HG0001911 (00988502).PDF; HG0001920 (00988506).PDF; HG0001936 (00988512).PDF; HG0001946 (00988517).PDF; HG0001955 (00988521).PDF; HG0002102 (00988536).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #21.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 2:49 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #21 Email No. 2
Attachments: HG0001944 (00988516).PDF; HG0001948 (00988518).PDF; HG0001954 (00988520).PDF; HG0001957 (00988522).PDF; HG0002054 (00988529).PDF; HG0002101 (00988535).PDF; HG0001837 (00988466).PDF; HG0001848 (00988471).PDF; HG0001856 (00988476).PDF; HG0001862 (00988479).PDF; HG0001881 (00988489).PDF; HG0001883 (00988490).PDF; HG0001888 (00988492).PDF; HG0001898 (00988496).PDF; HG0001901 (00988497).PDF; HG0001907 (00988501).PDF; HG0001923 (00988507).PDF

Counsel:

Attached please find additional documents responsive to MDx's RFP #21.

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Vazquez, Jesus

From: Vazquez, Jesus

Sent: Wednesday, October 26, 2011 3:01 AM

To: 'Scott D. Stimpson'

Cc: David C. Lee

Subject: RFP #21 Email No. 3

Attachments: HG0001576 (00988451).PDF; HG0001827 (00988461).PDF; HG0001842 (00988468).PDF; HG0001850 (00988472).PDF; HG0001896 (00988495).PDF; HG0001924 (00988508).PDF; HG0001943 (00988515).PDF; HG0002055 (00988530).PDF; HG0002057 (00988531).PDF; HG0001444 (00988445).PDF; HG0001578 (00988452).PDF; HG0001835 (00988465).PDF; HG0001844 (00988469).PDF; HG0001865 (00988480).PDF; HG0001874 (00988485).PDF; HG0001876 (00988486).PDF; HG0001877 (00988487).PDF; HG0001879 (00988488).PDF

Counsel:

Attached please find additional documents responsive to MDx's RFP #21.

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Vazquez, Jesus

From: Vazquez, Jesus

Sent: Wednesday, October 26, 2011 3:12 AM

To: 'Scott D. Stimpson'

Cc: David C. Lee

Subject: RFP #21 Email No. 4 of 4

Attachments: HG0001891 (00988493).PDF; HG0001914 (00988503).PDF; HG0001916 (00988504).PDF; HG0001927 (00988509).PDF; HG0001942 (00988514).PDF; HG0001959 (00988523).PDF; HG0001964 (00988525).PDF; HG0002611 (00988443).PDF; HG0001825 (00988460).PDF; HG0001831 (00988463).PDF; HG0001839 (00988467).PDF; HG0001858 (00988477).PDF; HG0001872 (00988484).PDF; HG0001893 (00988494).PDF; HG0001918 (00988505).PDF; HG0001930 (00988510).PDF; HG0001939 (00988513).PDF; HG0001951 (00988519).PDF; HG0001961 (00988524).PDF

Counsel:

Attached please find additional documents responsive to MDx's RFP #21.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 11:16 PM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #22 and RFP #25
Attachments: HG0001990 (00988527).PDF; HG0002549 (00988440).PDF; HG0002012 (00988528).PDF; HG0001966 (00988526).PDF; HG0002591 (00988441).PDF; HG0002600 (00988442).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #22 and RFP #25. Please treat these documents as Attorney's Eyse Only.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 11:30 PM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #22
Attachments: HG0001495 (00988449).PDF; HG0001728 (00988457).PDF; HG0001541 (00988450).PDF; HG0001694 (00988456).PDF; HG0002081 (00988534).PDF; HG0002060 (00988533).PDF; HG0001801 (00988459).PDF; HG0001451 (00988448).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #22. Please treat these documents as Attorney's Eyes Only.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 11:38 PM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #21
Attachments: HG0001829 (00988462).PDF; HG0001860 (00988478).PDF; HG0001933 (00988511).PDF

Counsel:

Attached please find documents responsive to MDx's RFP #21.

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Vazquez, Jesus

From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 11:49 PM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #20
Attachments: HG0001384 (00988444).PDF; HG0002109 (00988538).PDF; HG0002172 (00988539).PDF; HG0002241 (00988540).PDF; HG0001580 (00988453).PDF; HG0001664 (00988455).PDF; HG0002330 (00988541).PDF

Counsel:

The documents we produced with our email below as responsive to MDX's RFP #19 (the same documents are attached hereto) are also responsive to MDX's RFP #20. Please treat documents bates numbered HG0001664 - HG0001693 and HG0002330 - HG0002362 as Attorney's Eyes Only.

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From: Vazquez, Jesus
Sent: Wednesday, October 26, 2011 12:31 AM
To: 'Scott D. Stimpson'
Cc: David C. Lee
Subject: RFP #19

Counsel:

Attached please find documents responsive to MDx's RFP #19. Please treat documents bates numbered HG0001664 - HG0001693 and HG0002330 - HG0002362 as Attorney's Eyes Only.

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