

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Plaintiff,

Case No.: 2:07-cv-10614

v.

Assigned To: Anna Diggs Taylor

ACCIDENT VICTIMS HOME HEALTH
CARE SERVICES, INC. and GEORGE
RATH PAIGE,

Referral Judge: R. STEVEN WHALEN

Defendants.

Richard K. Grover, Jr. (P37566)
John P. Lewis (P49360)
HACKNEY, GROVER, HOOVER
& BEAN, PLC
Attorneys for Plaintiff
3514 Rivertown Point Court, Suite B
Grandville, MI 49418
616-257-3900

Thomas H. Randolph (P53563)
Attorney for Defendants
32255 Northwestern Highway
Farmington Hills, MI 48334
248-851-1222

**PLAINTIFF'S SUPPLEMENTAL ANSWER TO DEFENDANTS' SECOND
INTERROGATORIES TO PLAINTIFF AS TO INTERROGATORY NO. 2,
ONLY, PURSUANT TO COURT ORDER**

NOW COMES Plaintiff, State Farm Mutual Automobile Insurance Company, by
and through its attorneys, Hackney, Grover, Hoover & Bean, PLC, and supplements its

answer to Defendants' Second Interrogatories as to Interrogatory No. 2, only, pursuant to Court Order as follows:

2. State the total number of claimants for which each professional listed below has provided an opinion to State Farm and also list the dollar amount paid by Plaintiff to each professional for said opinions.

Grant Hyatt, M.D.
Edward Trachtman, D.O.
John Buchheister, DDS
Kenneth Lockwood, D.C.
Steven Boodin, M.D.
Donald Tate, Ph.D.
Manford Griffenstein, Ph.D.
Phillip Mercier, M.D.
Marilyn Lantor
Leonard Sahn
Steven Geiringer, M.D.
Harvey Ager, M.D.
Thomas Gola, Ph.D.

ANSWER:

The answers to this Interrogatory provided below are based on information provided to State Farm Mutual Automobile Insurance Company ("State Farm") from the vendors identified in conjunction with records maintained by State Farm itself. In some cases, vendors only retained information as far as payments made by State Farm to those vendors going back to the year 2001 or, in some cases, to 2002. Others were able to provide information going back to 1999. After contacting all the vendors involved and tracking payments made by State Farm to tax identification numbers associated with these vendors, the numbers identified below

represent the most accurate answers that State Farm is currently able to generate in response to this Interrogatory.

In addition, full records for payments were only available up through the year 2007 as the final numbers on 2008 have not yet been compiled. If necessary, State Farm can update this answer when that data becomes available.

As far as the number of claimants involved for each of the vendors identified below, in many cases, the vendors were not able to provide that information and State Farm is not able to determine the numbers of claimants based on the financial information readily available. For those individuals where a "0" is indicated, this is believed to be an accurate number as there is no information that Phillip Mercier, M.D. and Donald Tate, Ph.D. were ever utilized by State Farm in the role of an independent medical examiner.

Doctor	Number of Claimants
Grant Hyatt, D.C.	Unknown
Edward Tracthman, D.O.	Approximately 460
Johnn Buchheister, DDS	Unknown
Kenneth Lockwood, D.C.	Unknown
Steven Boodin, M.D.	Apprcximately 231
Donald Tate, Ph.D.	0
Manford Greiffenstein, Ph.D.	Approximately 267
Phillip Mercier, M.D.	0
Raymond Mercier, M.D.	Unknown

Marilyn Lantor, RN

Approximately 88

Leonard Sahn, M.D.

Approximately 315

Steven Geiringer, M.D.

Approximately 330

Harvey Ager, M.D.

Approximately 91

Thomas Gola, Ph.D.

Unknown

[REDACTED]

A [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

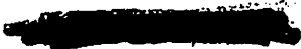
[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]



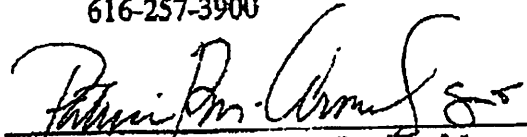
HACKNEY, GROVER, HOOVER & BEAN, PLC
Attorneys for Plaintiff

Dated: February 11, 2009

By: 
John P. Lewis (P-49360)


BUSINESS ADDRESS & TELEPHONE NO.:
3514 RiverTown Point Court, Suite B
Grandville, MI 49418
616-257-3900

Dated: February 11, 2009


Patricia Parr-Armelagos, Section Manager for State
Farm Mutual Automobile Insurance Company

CERTIFICATION OF SERVICE

Tonya L. Harris, Ottawa County Notary Public, certifies that on February 11, 2009, she served Plaintiff's Supplemental Answer to Defendants' Second Interrogatories to Plaintiff as to Interrogatory No. 2, only, Pursuant to Court Order on the above attorneys of record by mailing same to them at their addresses of record via first class mail with postage prepaid and facsimile thereupon.


Tonya L. Harris, Notary Public
Ottawa County (acting in), Michigan
My Commission Expires: 4-6-2015