

# **Exhibit A**

**ND&S** Nicoll Davis & Spinella LLP  
95 Route 17 South, Suite 316  
Paramus, New Jersey 07652  
Phone: (201) 712-1616  
Fax: (201) 712-9444  
Attorneys for Defendant,  
Dr. Jaime A. Salas Rushford  
Marco A. Gonzalez, Jr.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

AMERICAN BOARD OF INTERNAL  
MEDICINE,

Civil Action No. 14-cv-06428-KSH-CLW

PLAINTIFF,

-V.-

JAIME A. "JIMMY" SALAS RUSHFORD,  
M.D.,

DEFENDANT,

**NOTICE OF SUBPOENA DUCES TECUM TO  
RAJENDER K. ARORA, M.D.**

TO: DEFENDANT AMERICAN BOARD OF INTERNAL MEDICINE  
c/o Roberto A. Rivera-Soto, Esq.  
Ballard Spahr  
210 Lake Drive East, Suite 200  
Cherry Hill, New Jersey 08002

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, Defendant Jaime A. Salas Rushford, M.D., will take the deposition of, and request documents and electronically stored information from RAJENDER K. ARORA, M.D. See

{0518-3269/00395895-1}

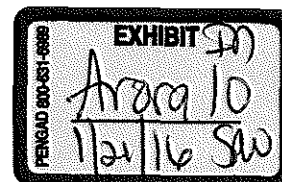


Exhibit A (copy of Subpoena Duces Tecum). The deposition shall take place at the offices of Nicoll Davis & Spinella LLP, located at 95 Rt. 17 South, Suite 316 Paramus, NJ 07652 or at such other mutually convenient location as the parties and the witnesses may agree at **9:15 a.m.** on **October 29, 2015**. Documents and tangible things responsive to the requests shall be produced at the offices of Nicoll Davis & Spinella LLP, located at 95 Rt. 17 South, Suite 316 Paramus, NJ 07652 or at such other mutually convenient location as the parties and the witness may agree, three (3) days prior to the deposition.

The deposition will be taken before Certified Shorthand Reporter, Notary Public, or other officer duly authorized to administer oath and may be videotaped.

Counsel for other parties are invited to attend and cross-examine the witness.

DATED: October 16, 2015

Respectfully submitted,

/s/ M. A. Gonzalez, Jr.

M. A. Gonzalez, Jr.

NICOLL DAVIS & SPINELLA LLP

95 Route 17 South, Suite 316

Paramus, New Jersey 07652

(201) 712-1616

mgonzalez@ndslaw.com

Guillermo L. Mena-Irizarry

*Pro Hac Vice*

Diligent Legal LLC

PO Box 11383

San Juan, PR 00922

Tel: (787) 347-9793

E-mail: guillermo.mena@me.com

Attorneys for Plaintiff,

Heartland Payment Systems, Inc.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on October 16, 2015, via fax and certified U.S. mail.

Roberto A. Rivera-Soto, Esq.  
Ballard Spahr  
210 Lake Drive East, Suite 200  
Cherry Hill, New Jersey 08002

/s/ M. A. Gonzalez, Jr.  
M. A. Gonzalez, Jr.

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of New Jersey

American Board of Internal Medicine

Plaintiff

v.

Jaime Salas Rushford, M.D.

Defendant

Civil Action No. 3:114-cv-06428-KSH-CLW

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Rajender K. Arora, M.D., 2168 Milburn Ave., #205, Maplewood, NJ 07040

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment: See Exhibit 1 (attached hereto)

Table with 2 columns: Place (Nicoll Davis & Spinella LLP, 95 Rt. 17 South, Suite 316 Paramus, NJ 07652) and Date and Time (10/29/2015 9:15 am)

The deposition will be recorded by this method: Certified Shorthand and/or Videotaped

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit 1 (attached hereto)

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/16/2015

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Marco A. Gonzalez 15/1

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) J. Salas Rushford

, who issues or requests this subpoena, are:

M.A.Gonzalez, Jr., Nicoll Davis & Spinella LLP, 95 Route 17 South, Suite 316, Paramus, NJ 07652; 201-712-1616

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:114-cv-06428-KSH-CLW

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

## EXHIBIT 1

### I. INSTRUCTIONS

1. You are reminded that your written response to the Requests for Production shall state, with respect to each category of items, that inspection and other requested action will be permitted as requested, except to the extent that you object in writing to particular items or categories. Your written responses and/or objections shall be served on counsel for Defendant, Nicoll Davis & Spinella LLP.

2. Please produce legible copies of documents responsive to the following Requests for Production at the offices of Nicoll Davis & Spinella LLP, 95 Rt. 17 South, Suite 316, Paramus, NJ 07652, at least three days prior to the deposition.

3. If you contend that you may partially or entirely withhold a requested document or category of documents because of a rule, privilege, immunity, or other reason, for each document partially or entirely withheld, identify the document and the state of the factual basis on which you claim the privilege or immunity.

4. If any or all documents identified or requested herein are no longer in existence or may no longer in your possession, custody, or control because of destruction, transfer, loss, or any other reason, then identify each and every such document.

5. The definitions listed below are to be construed as broadly as possible to include the most information or documents responsive to the discovery requests propounded herein.

6. On the date you have been commanded to appear and testify, you will do so about matters related to those about which you are requested to produce documents or things below and about any other matter related to Arora Board Review, the Arora Board Review Course, the



American Board of Internal Medicine, your professional background, and Dr. Jaime A. “Jimmy” Salas Rushford.

7. This discovery request is continuing. In the event that any information or material responsive to any Request for Production comes to your attention, possession, custody, or control, or the attention, possession, custody, or control, or your agents, principals, employees, affiliates, subsidiaries, accountants, partners, officers, family members, directors, or attorneys subsequent to the filing of your response, you are required to furnish the additional information, responses, or material to Plaintiff as soon as possible.

8. If any of the following requested documents are stored magnetically, electronically, or otherwise, Plaintiff specifically request production of these items in native electronic format, including all metadata.

## **II. DEFINITIONS**

1. As used herein, the following terms shall have the meanings indicated below and each time any such word is used, you will be charged with knowledge of such definitions in responding. In each case, your response should address all the elements or questions included in such defined words.

2. The terms “**you**” and “**your**” refer to **Rajender K. Arora, M.D**, and they include his past and present agents, principals, employees, affiliates, subsidiaries, accountants, partners, officers, family members, directors, predecessors, successors, assigns, legal representatives, non-legal representatives, personal representatives, employees and affiliated entities, and also include individuals and entities who act, have acted, purport to act, or have purported to act on her behalf.

3. The term “**Plaintiff**” refers to the American Board of Internal Medicine (“ABIM”), Plaintiff in this action, and it includes its past and present directors, officers, agents, predecessors, successors, assigns, legal representatives, non-legal representatives, personal representatives, attorneys, employees, subsidiaries, and parent companies, sister companies, and affiliated entities, and also include individuals and entities who act, have acted, purport to act, or have purported to act on its behalf.

4. The terms “**Defendant**” and “**Dr. Salas Rushford, M.D.**,” refer to Defendant, Jaime A. Salas Rushford, M.D., and it includes his past and present agents, predecessors, successors, assigns, legal representatives, non- legal representatives, non-legal representatives, personal representatives, attorneys, employees, subsidiaries, and parent companies, sister companies, and affiliated entities, and also include individuals and entities who act, have acted, purport to act, or have purported to act on behalf of Douglas O’Connor.

5. The term “**Lawsuit**” refers to the present litigation styled American Board of Internal Medicine v. Jaime Salas Rushford, M.D. in the United States District Court for the District of New Jersey, Civil Action No. 3:14-CV-6428. Copies of the Complaint and the Answer to the Complaint in the Lawsuit are included for convenience.

6. The term “**Arora Board Review Course**” refers to refers to all the classes, conferences, courses, presentations and other events held by Arora Board Review and/or its officers, including you, to help physician candidates for ABIM Certification in Internal Medicine or any subspecialty pass the corresponding ABIM examination, or to help any ABIM Certified physicians pass their ABIM Maintenance of Certification Examination, and it also refers to all the materials provided in or created for those classes, conferences, courses, presentations and other events.

7. The term “**May 2009 New York Review**” refers to the specific Arora Board Review Course which was held at the Graduate Center of the City University of New York between May 18 and May 23, 2009.

8. The term “**ABIM Examination**” or “**ABIM Exams**” refers to any ABIM Certification or Maintenance of Certification Examination and their content and programming.

9. The term “**documents**” means all original writings or recordings of records or letters, words, numbers, images or their equivalent, set down by handwriting, type writing, printing, photo-stating, photographing, photocopying, facsimile, e-mail, cloud stored information, magnetic impulse, recording, mechanical or electronic recording, or any other form of data recording or compilation including all electronically stored information or data.

10. The term “**person**” refers to any individual, corporation, general partnership, limited partnership, joint venture, association, joint venture, association, joint-stock company, trust, incorporated organization, government or political subdivision thereof, and any other non-natural person of whatever nature.

11. The term “**all**” includes and encompasses “**any.**” The term “**any**” includes and encompasses “**all.**”

12. The term “**and**” and the word “**or**” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.

13. The term “**date**” means the exact date, month, and year, if ascertainable, or if not, the best available approximation.

14. The term “**to the present**” means that date upon which this Subpoena was issued.

15. The term “**communication,**” or any variant thereof, means any contact between two or more persons by which any information or knowledge is transmitted or conveyed between

two or more persons and shall include, without limitation, written contact by means such as letters, memoranda, telegrams, telecopy's, telexes, e-mails, text messages, social media messages, instant messages or any other document, and any oral communication, such as face-to-face meetings or telephone conversations.

16. With respect to the terms **“identify”** or **“identification”**:

- a. When used with respect to the natural person means to state to the extent known: (i) the person's full name; (ii) the person's present or last known home and business addresses; (iii) the person's present or last known telephone number and email address; (iv) the person's occupation or business; (v) the person's present or last known employer and position; and (vi) the person's employer and position at the time relevant to the particular interrogatory involved;
- b. When referring to a person other than an individual, means to state to the extent known: (i) state the name of the entity; (ii) the type of entity (e.g., governmental agency, corporation, partnership, joint venture, etc.); (iii) its principal place of business; (iv) its place of incorporation; (v) its telephone number; (vi) the name of the chief executive officer; (vii) the agent for service of process; and (viii) the identify of persons representing or employed by the company having knowledge of the matters related to this lawsuit.
- c. When referring to documents, means to state to the extent known: (i) the type of documents; (ii) general subject matter and description of its contents; (iii) date of the document; (iv) author(s), address(es), and

recipient(s); (v) its title or heading; (vi) its custodian; and (vii) its present or last known location; and

- d. When used with respect to an activity means to state to the extent known:
- (i) a description of each action, occurrence, transaction, statement, communication, or conduct, constituting the activity;
  - (ii) the date it occurred;
  - (iii) the location at which it occurred;
  - (iv) the identity (in accordance with all preceding and proceeding Definitions) of all persons involved;
  - and (v) the identity ( in accordance with all preceding and proceeding Definitions) of each document relating to the activity.

17. **“Describe in detail”** when used with respect to an activity, transaction, relationship, thing, or occurrence, means to provide:

- (a) a full description of such activity, transaction, relationship, thing, or occurrence by reference to underlying facts including complete references to:
  - (i) date(s);
  - (ii) location(s);
  - (iii) persons or entities involved; and
  - (iv) manner of means employed;
- (b) the identify of your sources of information and the date on which you received such information;
- (c) the identify of each person or entity having knowledge of such activity, transaction, relationship, thing, or occurrence; and
- (d) the identify of each document that refers or related to such activity, transaction, relationship, thing, or occurrence.

18. The phrases “relate to,” “related to,” and “relating to,” or any variant thereof, include, but are not limited to, the following meanings: referring to, supporting, located in, considered in connection with, bearing, bearing on, evidencing, indicating, reporting on, recording, alluding to, responding to, concerning, opposing, favoring, connected with, commenting on, in respect of, about, regarding, discussing, showing, describing, reflecting, analyzing, constituting and being.

19. Any reference to an individual person, either singularly or as part of a defined group, includes that person’s past and present agents, legal representatives, non-legal representatives, personal representatives, attorneys, employees, subsidiaries, and parent companies, sister companies, and affiliated entities, and also include individuals and entities who act, have acted, purport to act, or have purported to act on behalf of such individual person.

20. Any reference to a non-natural person includes that person’s past and present directors, officers, agents, predecessors, successors, assigns, legal representatives, non-legal representatives, personal representatives, attorneys, employees, subsidiaries, and parent companies, sister companies, and affiliated entities, and also include individuals and entities who act, have acted, purport to act, or have purported to act on behalf of such non-natural person.

21. The singular includes the plural and vice versa.

22. The masculine gender includes the feminine and vice versa.

23. All other terms are to be interpreted in accordance with their normal usage in the English language.

**III. RELEVANT TIME PERIOD:** Unless otherwise stated below, the relevant time period for these requests and topics is from **January 1, 2006 to the present.**

IV. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: All documents that relate to any and all communications between you and Plaintiff.

REQUEST FOR PRODUCTION NO. 2: All documents that relate to any and all communications and /or exchanges of money between you and Defendant.

REQUEST FOR PRODUCTION NO. 3: All documents that you referred to, relied upon, consulted or used in any way to respond to this subpoena.

REQUEST FOR PRODUCTION NO. 4: All documents that relate to any and all allegations or claims in the subject Lawsuit.

REQUEST FOR PRODUCTION NO. 5: All documents that relate to any and all allegations or claims in the lawsuit entitled, American Board of Internal Medicine v. Rajender K. Arora, No. 2:09-cv-05707-JCJ, in the United States District Court for the Eastern District of Pennsylvania, including, but not limited to, those contained in pleadings, motions, discovery, orders, settlement communications, correspondence, certifications, statements, declarations, and affidavits.

REQUEST FOR PRODUCTION NO. 6: All documents that relate to any and all communications between you and any person concerning Plaintiff.

REQUEST FOR PRODUCTION NO. 7: All documents that relate to any and all contracts or agreements you have entered into with Plaintiff.

REQUEST FOR PRODUCTION NO. 8: All documents that relate to any and all communications between you and any person relating to any contracts or agreements you have entered with Plaintiff.

REQUEST FOR PRODUCTION NO. 9: All documents that relate to any and all communications between you and any present or former employee, agent or representative of Plaintiff that relate to any and all allegations or claims in the subject Lawsuit.

REQUEST FOR PRODUCTION NO. 10: All documents that include the names of persons that attended the Arora Board Review Course from 1989 to 2009.

REQUEST FOR PRODUCTION NO. 11: All documents that relate to all persons who registered for all Arora Board Review Courses between 1989 and 2009, including, but not limited to registration forms, receipts, advertisements, and course review material.

**REQUEST FOR PRODUCTION NO. 12:** All documents that relate to any and all medical material used, referred to or relied upon to produce, complement, create, or develop information provided in your Arora Board Review Courses.

**REQUEST FOR PRODUCTION NO. 13:** All documents that relate to any and all communications between you and the holder or user of the account padrinojr@yahoo.com.

**REQUEST FOR PRODUCTION NO. 14:** All documents that relate to the sponsorship for CME purposes of the Arora Board Review Course by the Lincoln Medical and Mental Health Center.

**REQUEST FOR PRODUCTION NO. 15:** All documents that relate to marketing and advertising materials of the Arora Board Review Course.

**REQUEST FOR PRODUCTION NO. 16:** All documents that relate to the creation and content of the website www.aroraboardreview.com.

**REQUEST FOR PRODUCTION NO. 17:** All documents that relate to the creation, server location, backup, and use of the email address boardreview@comcast.net.

**REQUEST FOR PRODUCTION NO. 18:** All documents that relate to your curriculum vitae and professional certifications.

**REQUEST FOR PRODUCTION NO. 19:** All documents that relate to any agreements between you and/or Arora Board Review and any teaching hospitals or medical residency programs.

**REQUEST FOR PRODUCTION NO. 20:** All documents that relate to any and all communications between you and the holder or user of the account jsalasmd@yahoo.com.

**REQUEST FOR PRODUCTION NO. 21:** All documents that relate to any and all communications between you and the holder or user of any of the following accounts vls\_79@yahoo.com; coropalermo@caribe.net; medico13@hotmail.com; lloxa@hotmail.com; galtamar@hotmail.com; mscasiano002@yahoo.com; RVP33135@yahoo.com; ruthiemartinez@gmail.com; viry17@aol.com; viridiana017@yahoo.com; and, Geraldine\_Luna@hotmail.com.

**REQUEST FOR PRODUCTION NO. 22:** All documents that relate to any and all communications between you and Omar Esponda or between you and any person concerning Omar Esponda.



**NICOLL DAVIS & SPINELLA LLP**  
95 Route 17 South  
Suite 316  
Paramus, New Jersey 07652  
  
(201) 712-1616  
Telecopier (201) 712-9444

**TELECOPIER TRANSMITTAL COVER SHEET**

**PLEASE DELIVER THE FOLLOWING PAGES:**

**DATE:** October 16, 2015  
**TO:** Guaranteed Subpoena  
**TELECOPIER #:** (908) 688-0885  
**CC:** Roberto Rivera-Soto, Esq.  
**TELECOPIER #:** (856) 761-1020  
**FROM:** Marco A. Gonzalez, Jr., Esq.  
**Re:** American Board of Internal Medicine v. Jaime A. "Jimmy"  
Salas Rushford, M.D.

There will be - 13 - page(s) including this cover page

**EXPEDITED SERVICE REQUESTED**

Please serve the attached Subpoena. Thank you.

\*\*\*\*\*CONFIDENTIALITY NOTE\*\*\*\*\*  
The documents accompanying this telecopy transmission contain information from the law offices of Nicoll Davis & Spinella LLP which is confidential and/or legally privileged. The information is intended only for the use of the individuals or entities named on this transmission sheet. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited, and that the documents should be returned to this firm immediately. In this regard, if you have received this telecopy in error, please notify us by telephone immediately so that we can arrange for the return of the original documents to us at no cost to you.

# Send Result Report



MFP

CS 4500i

Firmware Version 2LH\_2F00.009.018 2014.12.05

10/16/2015 11:26  
[2LF\_1000.007.004] [2K9\_1100.002.001] [2LC\_7000.009.012]

Job No.: 049862

Total Time: 0'02'19"

Page: 013

# Complete

Document: doc04986220151016112316

NICOLL DAVIS & SPINELLA LLP  
95 Route 17 South  
Suite 316  
Paramus, New Jersey 07652  
(201) 712-1616  
Telecopier (201) 712-9444

TELECOPIER TRANSMITTAL COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGES:

DATE: October 16, 2015  
TO: Guaranteed Subpoena  
TELECOPIER #: (908) 688-0885  
CC: Roberto Rivera-Soto, Esq.  
TELECOPIER #: (856) 761-1020  
FROM: Marco A. Gonzalez, Jr., Esq.  
Re: American Board of Internal Medicine v. Jafne A. "Jimmy"  
Salas Rushford, M.D.

There will be - 13 - page(s) including this cover page

**EXPEDITED SERVICE REQUESTED**

Please serve the attached Subpoena. Thank you.

\*\*\*\*\*CONFIDENTIALITY NOTICE\*\*\*\*\*  
The documents accompanying this telecopy transmission contain information from the law offices of Nicoll Davis & Spinella LLP which is confidential and/or legally privileged. The information is intended only for the use of the individuals or entities named on this transmittal sheet. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited, and that the documents should be returned to this firm immediately. In this regard, if you have received this telecopy in error, please notify us by telephone immediately so that we can arrange for the return of the original documents to us at no cost to you.

{0518-5269/00395929-1}

No.	Date and Time	Destination	Times	Type	Result	Resolution/ECM
001	10/16/15 11:24	19086880885	0'02'19"	FAX	OK	200x100 Normal/On



# Send Result Report

MFP

CS 4500i

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10/16/2015 16:03  
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