

UNITED STATES OF AMERICA
BEFORE THE FOOD AND DRUG ADMINISTRATION
DEPARTMENT OF HEALTH AND HUMAN SERVICES

In the Matter of:

ECUMED HEALTH GROUP)
a corporation,)
)
and)
)
AMADOR REYES,)
JUAN C. CARRAI,)
RICHARD W. STONE, M.D. and)
ERLINDA B. ENRIQUEZ, M.D.)
Individuals.)
_____)

FDA Docket: 2004H-0322

3/5/04 09:31:22 AM

ERLINDA E. ENRIQUEZ, M.D.'S RESPONSE TO REQUEST TO PRODUCE

Respondent, ERLINDA B. ENRIQUEZ, M.D., by Steven R. Ballinger, attorney for Respondent, respectfully responds to the COMPLAINANT, The Center for Devices and Radiological Health, United States Food and Drug Administration's (FDA's) Request for Production of Documents as follows:

1. Objection, over-broad, burdensome and an invasion of the privacy of individuals not a party to this action; Further the Respondent is not named as a corporation, but as an individual.
2. Objection, over broad and burdensome, the records of these tax returns include the private information of the spouse of the Respondent who could not be held legally responsible under either Federal or Florida law in this matter.
3. Same objections as above.
4. Attached.
5. Respondent is self employed, and objection in that this calls for unrelated information on non-involved entities or persons.
6. None
7. None
8. None
9. Attached

2004H-0322

RMD 1

10. None
11. Attached
12. None
13. None
14. Attached
15. Attached
16. None
17. None
18. None
19. Objection, work product privilege.
20. Attached.

CERTIFICATE OF SERVICE

I hereby certify that original Response to Request to Produce of Respondent Erlinda B. Enriquez, M.D. was sent by Federal Express Airbill # 833999374026 to the Division of Dockets Managements, Food and Drug Administration, 5630 Fishers Lane, Room 1061 (HA-305), Rockville, MD 20852 on March 25, 2005, and to Michael N. Varrone, Department of Health and Human Services, Office of the General Counsel, Food and Drug Division, via facsimile at (301) 827-0973 and by 5 Federal Express Airbill # 833999374026 to 600 Fishers Lane, Room 6-39 (GCF-1), Rockville MD 20857.



Steven R. Ballinger, Esq.
Steven R. Ballinger, P.A.
888 South Andrews Avenue
Suite 205
Fort Lauderdale, Florida 33316
Tel: (954) 527-5222
Fax: (954) 760-5844