

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

=====X **Index #:** _____

KHADESHA THOMPSON

Petitioner,

**PRE-ACTION
PETITION**

-against-

PLANNED PARENTHOOD

Respondent.

=====X

CARMINE A. RUBINO, an attorney duly admitted to practice law before the Courts of the State of New York, and a member of the firm of **KRAMER, DILLOF, LIVINGSTON & MOORE, ESQS.**, attorneys for the petitioner herein, hereby affirms the following to be true under the penalties of perjury:

This affirmation is in support of the within Petition for an Order directing the respondent to comply with the requests for copies of the medical records of the above-named petitioner and for such other and further relief as to this Court may seem just and proper.

This office is investigating an action on behalf of **KHADESHA THOMPSON**. To properly investigate the matter and name the proper party defendants, it is necessary that we obtain a complete and legible copy of the medical and billing records pertaining to **KHADESHA THOMPSON** from **PLANNED PARENTHOOD**.

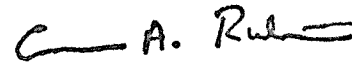
On September 27, 2024, our paralegal, DeKeisha George-Jituboh, faxed a copy of our letter and executed authorization for release of the records to the medical records department at **PLANNED PARENTHOOD** (a copy of the letter, authorization and fax confirmation are annexed hereto as **Exhibit "A"**).

On November 5, 2024, Ms. George-Jituboh followed up with the medical records department by leaving voicemail messages and a second request was faxed (annexed hereto as **Exhibit "B"** is a copy of our letters and fax confirmation).

Ms. George-Jituboh followed up with the respondent via telephone on numerous occasions, faxed and mailed a third and final request via express mail (FedEx) on November 19, 2024 (annexed hereto as **Exhibit "C"** are copies of our letter, authorization, fax confirmation & FedEx receipt). To date, the respondent has not responded to Ms. George-Jituboh's messages or provided the medical records.

WHEREFORE, it is respectfully requested that the petition be granted to the extent indicated herein.

Dated: New York, New York
December 17, 2024



CARMINE A. RUBINO

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

=====X Index #: _____

KHADESHA THOMPSON

Petitioner,

**AFFIRMATION OF
GOOD FAITH**

-against-

PLANNED PARENTHOOD

Respondents.

=====X

CARMINE A. RUBINO, an attorney duly admitted to practice law before the Courts of the State of New York, and a member of the firm of **KRAMER, DILLOF, LIVINGSTON & MOORE, ESQS.**, attorneys for the petitioner herein, hereby affirms the following to be true under the penalties of perjury:

This affirmation is being submitted in good faith on behalf of the within petitioner.

This office has amicably tried to resolve this matter without the necessity of making this petition but it has proven fruitless. We have been in touch with the respondent on several occasions and have also written letters requesting certain records. To date, we have not received these documents.

WHEREFORE, it is respectfully requested that this petition be granted in its entirety.

Dated: New York, New York
December 17, 2024



CARMINE A. RUBINO, ESQ.