

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
LAW DIVISION - SECOND DISTRICT

MICHAEL APPLEBAUM, Special )  
Administrator of the Estate of JOSEPH )  
APPLEBAUM, deceased, )

Plaintiff, )

v. )

No. 05 L 62044

RUSH NORTH SHORE MEDICAL )  
CENTER, RUSH UNIVERSITY )  
MEDICAL CENTER RUSH MEDICAL )  
COLLEGE, DR. IBRAHIM, #074/MOD, )  
EMEKA EZE, MD, JOSE VELASCO, MD, )  
JOHN DOE DOCTOR #338, LAWRENCE )  
LAYFER, MD, UNIVERSITY )  
RHEUMATOLOGISTS, ALAN REICH, )  
MD, NORTH SHORE RADIOLOGY, )  
RUSH NORTH SHORE MEDICAL )  
CENTER DEPARTMENT OF )  
RADIOLOGY, NORTH SHORE MRI/CT )  
CENTRE, LEONARD BERLIN, MD, )  
MICHAEL RACENSTEIN, MD, GARY )  
NOVETSKY, MD, M. EDELMAN, MD, )  
AVRUM EPSTEIN, MD, M. SMITH, MD, )  
J. ALEXANDER, MD, C. FISHER, MD, )  
CHEST MEDICINE CONSULTANTS, )  
VADIM LEYENSON, MD, )

Defendants. )

**DEFENDANTS' REQUEST FOR ADMISSION OF FACT  
PURSUANT TO SUPREME COURT RULE 216**

NOW COME the defendants, RUSH UNIVERSITY MEDICAL CENTER, RUSH UNIVERSITY MEDICAL CENTER d/b/a UNIVERSITY RHEUMATOLOGISTS, RUSH UNIVERSITY MEDICAL CENTER d/b/a RUSH MEDICAL COLLEGE, LAWRENCE LAYFER, M.D., and OSAMA IBRAHIM, M.D., by and through their attorneys, ANDERSON, RASOR & PARTNERS, LLP, and requests that plaintiff, Michael Applebaum, to admit or deny each fact set forth herein within twenty-eight (28) days of service hereof upon you:

**Request to Admit No. 1:** Plaintiff Michael Applebaum's full name is Michael Israel Applebaum.

**Response:**

**Request to Admit No. 2:** During the year 2003, Plaintiff Michael Applebaum was not licensed in Illinois to practice law on behalf of other individuals

**Response:**

**Request to Admit No. 3:** During the year 2003, Plaintiff Michael Applebaum did not have a license from the Illinois Attorney Registration & Disciplinary Committee designating him as an actively licensed attorney who may practice law on behalf of other persons in the State of Illinois.

**Response:**

**Request to Admit No. 4:** During the year 2004, Plaintiff Michael Applebaum was not licensed in Illinois to practice law on behalf of other individuals

**Response:**

**Request to Admit No. 5:** During the year 2004, Plaintiff Michael Applebaum did not have a license from the Illinois Attorney Registration & Disciplinary Committee designating him as an actively licensed attorney who may practice law on behalf of other persons in the State of Illinois.

**Response:**

**Request to Admit No. 6:** During the year 2005, Plaintiff Michael Applebaum was not licensed in Illinois to practice law on behalf of other individuals

**Response:**

**Request to Admit No. 7:** During the year 2005, Plaintiff Michael Applebaum did not have a license from the Illinois Attorney Registration & Disciplinary Committee designating him as an actively licensed attorney who may practice law on behalf of other persons in the State of Illinois.

**Response:**

**Request to Admit No. 8:** During the year 2006, Plaintiff Michael Applebaum was not licensed in Illinois to practice law on behalf of other individuals

**Response:**

**Request to Admit No. 9:** During the year 2006, Plaintiff Michael Applebaum did not have a license from the Illinois Attorney Registration & Disciplinary Committee designating him as an actively licensed attorney who may practice law on behalf of other persons.

**Response:**

**Request to Admit No. 10:** Plaintiff Michael Applebaum is the Special Administrator for the Estate of Joseph Applebaum.

**Response:**

**Request to Admit No. 11:** In December 2003, Plaintiff Michael Applebaum formed the opinion that medical malpractice had been committed with regard to the care provided to Joseph Applebaum during the December 1, 2003 admission to Rush North Shore Medical Center.

**Response:**

**Request to Admit No. 12:** Plaintiff Michael Applebaum has filed this cause of action in his *pro se* capacity as Special Administrator of the Estate of Joseph Applebaum.

**Response:**

**Request to Admit No. 13:** Plaintiff Michael Applebaum filed a complaint with the Joint Commission on Accreditation of Hospitals regarding the care provided to Joseph Applebaum during the December 1, 2003 admission to Rush North Shore Medical Center.

**Response:**

**Request to Admit No. 14:** Plaintiff Michael Applebaum contacted the Skokie Police Department and requested criminal charges be brought against Lawrence Layfer, M.D., for the care he provided to Joseph Applebaum during the December 1, 2003 admission to Rush North Shore Medical Center.

**Response:**



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Aaron P. Ryan  
One of the Attorneys for Defendants  
RUSH UNIVERSITY MEDICAL CENTER, RUSH  
UNIVERSITY MEDICAL CENTER d/b/a  
UNIVERSITY RHEUMATOLOGISTS, RUSH

UNIVERSITY MEDICAL CENTER d/b/a RUSH  
MEDICAL COLLEGE, LAWRENCE LAYFER,  
M.D., and OSAMA IBRAHIM, M.D.

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