

*Received from nurse
20250328 at 10:03*

STATE OF NEW YORK
SUPREME COURT: COUNTY OF ERIE

In the Matter of the Application of
ERIE COUNTY MEDICAL CENTER CORPORATION,

Petitioner,

For an Order Authorizing the Involuntary Treatment of

PETITION

Deirdre Moore,

a patient at the Erie County Medical Center Corporation

Martha Mumbach, Risk Management Assistant, as the designee of the Petitioner,
Erie County Medical Center Corporation ["ECMCC"], by Thomas Quatroche, Jr., Ph.D.,
Chief Executive Officer, respectfully states and alleges;

1. I am the Risk Management Assistant of the Erie County Medical Center Corporation and am the designee of Thomas Quatroche, Jr., Ph.D., Chief Executive Officer, of ECMCC.

2. As said designee, I am authorized to commence a proceeding pursuant to Mental Hygiene Law §33.03; 14 NYCRR Part 527 for Court authorization to treat Deirdre Moore, ["the patient"] over objection.

3. The patient is admitted to ECMCC, and, upon information and belief, is presently suffering from a mental illness for which the patient is refusing treatment.

4. The patient has been evaluated by Michael Guppenberger, M.D. and Yogesh Bakhai, M.D., whose affirmations and evaluations are appended hereto and made a part hereof. The two physicians have determined that the proposed treatment is in the


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patient's best interests and that the patient lacks capacity to make a reasoned decision concerning such treatment.

5. No previous application has been made for the relief sought herein.

WHEREFORE, Petitioner respectfully requests that:

1. The Court appoint an attorney to represent the patient in these proceedings;
2. An Order of the Court be granted authorizing involuntary treatment of the patient, including, but not limited to, administration of medication as prescribed by the treating physician; and
3. Petitioner have such other and further relief as to the Court may deem just and proper.




Martha Mumbach, Risk Management Assistant
as designee of
Thomas Quatroche, Jr., Ph.D.,
Chief Executive Officer
Erie County Medical Center Corporation

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) SS:

Martha Mumbach, Risk Management Assistant, as designee of Thomas Quatroche, Jr., Ph.D., Chief Executive Officer of the Erie County Medical Center Corporation, being duly sworn, deposes and says:

That I am the designee of the Petitioner named in the foregoing Petition, that I duly executed the same, and that the contents of said Petition are true to my own knowledge, except as to the facts alleged upon information and belief, and that as to those facts, I believe the same to be true.



Martha Mumbach, Risk Management Assistant
as designee of
Thomas Quatroche, Jr., Ph.D.,
Chief Executive Officer
Erie County Medical Center Corporation

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