

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

CHARLES GOLDSTEIN, as
Personal Representative of the
Estate of HELENA GOLDSTEIN,

GENERAL JURISDICTION DIVISION

CASE NO.:

Petitioner,

vs.

BOCA RATON REGIONAL HOSPITAL,
INC.,

Respondent.

PETITION FOR PURE BILL OF DISCOVERY

Petitioner, CHARLES GOLDSTEIN, as Personal Representative of the Estate of HELENA GOLDSTEIN files this Petition for a Pure Bill of Discovery against Respondent, BOCA RATON REGIONAL HOSPITAL, INC., and upon information and belief states at all material times:

1. Petitioner is the duly appointed Personal Representative of the Estate of HELENA GOLDSTEIN. (Ex. A.)
2. On or about January 15, 2026, HELENA GOLDSTEIN went to a medical appointment at the Paley Institute in Boca Raton, Florida for a routine checkup for carpal tunnel syndrome and arthritis in her right hand.
3. During that checkup she was administered a right thumb carpometacarpal joint injection.
4. Immediately thereafter HELENA GOLDSTEIN fell unconscious and went into cardiac and respiratory arrest.

5. HELENA GOLDSTEIN was then transported via ambulance to Respondent, BOCA RATON REGIONAL HOSPITAL, INC., where she received treatment for several days until ultimately passing on January 19, 2026.
6. Respondent, BOCA RATON REGIONAL HOSPITAL, INC., has represented that they have in their possession thirty five (35) separate blood samples taken at various times from January 15, 2026, through January 18, 2026.
7. These are the only known blood samples of HELENA GOLDSTEIN taken after the injection at the Paley Institute.
8. Petitioner has retained a medical examiner to perform a private autopsy including blood sample analysis and has requested from Respondent that the blood samples be turned over to the medical examiner.
9. Petitioner has provided Respondent with a valid HIPAA release one more than one occasion but Respondent refuses to turn over the blood samples to the Petitioner or the medical examiner without the execution of a vaguely worded release that can be read to absolve the Respondent from any liability in the death of HELENA GOLDSTEIN.
10. Petitioner needs to acquire and preserve these blood samples related to the incident giving rise to HELENA GOLDSTEIN'S death and to identify all potentially responsible parties, and determine what claims are viable.
11. The blood samples are material and necessary to Petitioner's prospective claims arising from the incident which took place from January 15, 2026, through January 19, 2026.
12. This Petition is the only legal remedy by which Petitioner can get the blood samples from Respondent and determine what claims may exist against what parties.
13. A pure bill is warranted to allow a party to identify potential defendants and theories of liability. *Lewis v. Weaver*, 969 So. 2d 586 (Fla. 4th DCA 2007); *Payne v. Beverly*, 958

So. 2d 1112, 1114 (Fla. 5th DCA 2007); *Adventist Health Sys./Sunbelt, Inc. v. Hegwood*, 569 So. 2d 1295, 1297 (Fla. 5th DCA 1990).

14. Title 45 of the Code of Federal Regulations (“CFR”) covers “Public Welfare” and contains regulations from the Department of Health and Human Services (“HHS”). IT regulates human subject research protections, HIPAA privacy standards and other topics.
15. Regulations for the privacy, security and breach notification of protected health information (“PHI”) are governed by 45 CFR Parts 160-164.
16. Respondent, BOCA RATON REGIONAL HOSPITAL, INC., is a HIPAA health care provider and covered entity pursuant to 45 CFR §160.103.
17. The blood samples are individually identifiable health information and private health information pursuant to 45 CFR §160.103 and a designated record set pursuant to 45 CFR §501.
18. Respondent, BOCA RATON REGIONAL HOSPITAL, INC., is legally obligated to turn over the blood samples to Petitioner pursuant to 45 CFR §164.502(a)(2) and (g) and §164.524(a)(1) pursuant to his prior requests.
19. Respondent’s, BOCA RATON REGIONAL HOSPITAL, INC’S., outright refusal to turnover the blood samples to Petitioner unless he executes
20. Petitioner seeks production of all blood samples in Respondent’s possession and/or control related to the incident which took place from January 15, 2026, through January 19, 2026.

Wherefore, Petitioner asks for a Pure Bill of Discovery requiring Respondent to produce the requested blood samples along with any other relief deemed appropriate. Petitioner designates the addressees in the signature block below for eservice. Both addresses must be copied on all eservice emails.

/s/ Ignacio Segurola

Ignacio Segurola, Esquire

Attorney for Plaintiff

Florida Bar #: 0144436

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**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA**

PROBATE DIVISION

File No. 50-2026-CP-001984-XXXA-NB

IN RE: ESTATE OF
HELENA GOLDSTEIN

Division: IZ

Deceased.
_____ /

**LETTERS OF ADMINISTRATION
(single personal representative)**

TO ALL WHOM IT MAY CONCERN:

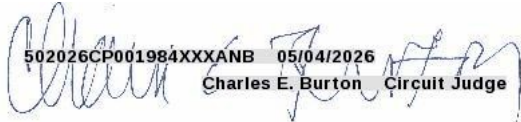
WHEREAS, Helena Goldstein, a resident of Palm Beach County, Florida, died on January 19, 2026, owning assets in the State of Florida, and

WHEREAS, Charles Goldstein has been appointed Personal Representative of the Estate of the Decedent and has performed all acts prerequisite to issuance of Letters of Administration in the Estate,

NOW, THEREFORE, I, the undersigned Circuit Judge, declare Charles Goldstein duly qualified under the laws of the State of Florida to act as Personal Representative of the Estate of Helena Goldstein, deceased, with full power to administer the Estate according to law; to ask, demand, sue for, recover and receive the property of the Decedent; to pay the debts of the Decedent as far as the assets of the Estate will permit and the law directs; and to make distribution of the Estate according to law.

DONE AND ORDERED at Palm Beach County, Florida

**This estate shall be closed within 12
months of this order, pursuant to Florida
Probate Rule 5.400.**


502026CP001984XXXANB 05/04/2026
Charles E. Burton Circuit Judge

502026CP001984XXXANB 05/04/2026
Charles E. Burton
Circuit Judge

EXHIBIT "A"