

BEFORE THE INDIANA STATE
BOARD OF NURSING

04-011

State of Indiana

Petitioner,

vs.

Deltona Tibbets-Figliola, R.N., N.P.

Respondent.

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CASE NO2004 NB 0049

MOTION TO AMEND PETITION TO SURRENDER NURSING LICENSE

Comes now Respondent, Deltona Tibbets-Figliola, R.N., N.P., by counsel, and moves the board to amend the Petition to Surrender Nursing License and in support thereof states:

1. Respondent, by counsel, filed her Petition to Surrender Nursing License on November 1, 2004.

2. Respondent inadvertently omitted an Affidavit in support of her Petition to Surrender Nursing License and wishes to amend the petition to include the Affidavit.

WHEREFORE, the Respondent respectfully requests that the board grant leave for the Respondent to file the Amended Petition To Surrender Nursing License and for all other relief just and proper in the premises.

Respectfully submitted,

MARCUS LAW FIRM

By: _____

Cynthia A. Marcus #18408-49

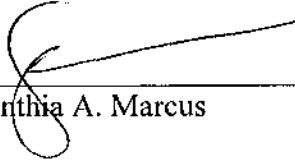
MARCUS LAW FIRM
11978 Fishers Crossing Drive
Fishers, Indiana 46038
Phone: (317) 845-4444
Fax: (317) 284-0266 (Fax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon:

Sara Matticks
Indiana Attorney General's Office
Indiana Government Center South
402 West Washington Street, Fifth Floor
Indianapolis, IN 46204-2770

by first class, United States mail, postage prepaid, this 15th day of November, 2004.



Cynthia A. Marcus