

VIRGINIA:

IN THE CIRCUIT COURT FOR PRINCE WILLIAM COUNTY

Plaintiff

*

*

v.

* Case No.

*

Defendants

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REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF

COMES NOW the Defendant, through counsel

1 and requests pursuant to the Rules of Procedure that the Plaintiff, through counsel, produce the following written documents, or true, accurate and legible copies thereof for inspection by Defendant:

1. Any and all health care providers' records, reports, notes, charts, hospital records, x-ray reports, or medical records, notes, charts, or reports of any kind relating to treatment or evaluation of the Plaintiff for injuries or damages allegedly related to the subject occurrence.
2. Any and all health care providers' bills, hospital bills, or bills of any kind relating to damages of any kind which the Plaintiff contends resulted from the subject occurrence.
3. Any and all health care providers' reports, notes, charts, records, hospital records, x-ray reports, or medical reports, notes, charts or records of any kind relating to treatment or evaluation of the Plaintiff for other accidental injuries, or any injury, disease, malady, illness, disability, or medical condition suffered by the Plaintiff within the last ten (10) years.

4. True and accurate copies of the Plaintiff's Federal and State income tax returns for the past four (4) years.

5. Any and all written material tending to support any claim for loss of earnings, or of earning capacity including but not limited to, lost wages statements, pay stubs, payroll records, W-2's, W-9's, 1099's and tax returns.

6. Any and all photographs, film, videotape, moving pictures, drawings, diagrams, or any other graphic or visual representation or depiction of the scene of the occurrence, or of any objects connected with the occurrence, or of any injuries or damages sustained by the Plaintiff as a result of the subject occurrence.

7. Any and all reports, records, notes, written materials, or electronically stored or computer stored information evidencing the findings or opinions regarding any fact or issue relevant to this case, of any expert whom you intend to call as a witness at the trial of this matter.

8. Any and all signed, written or recorded statements of any party to the present lawsuit.

9. Any and all written material or physical evidence of any kind which you intend to offer in evidence at the trial of this matter.

10. Any and all policies of insurance (including the policy, the declarations sheet and endorsements or amendments) that you have or possess that provides or may provide coverage of whatever nature (including but not limited to automobile liability; comprehensive general, business liability policy; uninsured/underinsurance; PIP; worker's compensation, disability, medical payments or medical expenses insurance) to compensate the Plaintiff for injuries sustained in the subject accident.

11. Please produce a copy of any and all written materials, documents, records, reports or tangible items referencing the party sending this request, received by you or your attorney, directly or indirectly, pursuant to any subpoena or pursuant to any authorization furnished by any party to this suit, or other person or entity, that permits the receipt of such documents, reports, records or tangible items.

12. Please produce a copy of any and all written materials or documents that evidence the identity of your health insurer, disability insurer, or worker's compensation insurer for each of the last ten (10) years. Please include with such materials the name, address and telephone number of the insurer, your group number, your subscriber or identification name and number, and any claim numbers associated with any claims you may have made in the past ten (10) years.

13. Any and all written materials, documents, or tangible items that evidence any settlement agreement, including but not limited to any releases, covenants not to sue, or settlement agreements of any nature that you have reached with any party to the present law suit, or any person or entity not a party to this suit against whom you asserted a claim for damages, arising out of the subject occurrence.

14. Any and all written materials, documents, or tangible items evidencing any judgment you have received against any person or entity not a party to this case against whom you asserted any claim or suit for damages arising out of the subject occurrence.

15. Any and all repair bills and estimates for damages to your vehicle.

16. The certificate of title or ownership for the vehicle you were operating at the time of the subject occurrence.

17. Please provide all documents, reports or records reflecting any inspections or maintenance or repairs to the vehicle operated by you or your driver or agent, servant or employee at the time of the accident, for one (1) year prior to the subject occurrence.

18. Please provide any and all reports, whether accident, incident or otherwise, made in the ordinary course of business with respect to the subject occurrence made by you or at your request.

19. Any and all documents, tapes, recordings, transcripts, records and docket entries from any hearing, criminal, traffic or otherwise, arising out of the subject occurrence.

20. Please attach a copy of any and all document(s) of any kind reflecting any communication that you or someone acting on your behalf had with representatives of the Defendant or someone acting on Defendant's behalf.

21. Please produce a copy of any and all documents, records, reports, or tangible items received by you or your attorney, directly or indirectly, pursuant to any subpoena or pursuant to any authorization furnished by any party that permits the receipt of such documents, reports, records, or tangible items.

22. Please produce any and all documents, writings, and tangible items that evidence the date, time and to whom you first made any claim for injury or damages against the Defendant propounding this Request for Production of Documents or said Defendant's insurer, agent or representative.

23. Please produce any and all documents, writings, and tangible items that evidence any information you obtained, wrote down, or recorded, regarding the subject occurrence and any communication you had with anyone regarding the occurrence, prior to when you retained an

attorney to represent you with respect to the subject occurrence. Please include in your answer any journals or other writings that you may have made that evidence or reflect any information you obtained, recorded or wrote down regarding the subject incident or any of your injuries or damages.

24. Please produce any and all documents, writings and tangible items that evidence the date and time that you retained an attorney to represent you with respect to any injuries or damages that you claim with respect to the subject accident. (Any documents that record the mental impressions or strategy of your attorney with respect to this matter need not be produced).

Pursuant to Rules of Procedure, it is requested that the aforementioned written documents be made available by the Plaintiff, through counsel, for inspection by Defendant in accordance with the Rules of Procedure ;