

DEFENDANT'S UPDATED REQUEST FOR PRODUCTION TO PLAINTIFF

COMES NOW, the Defendant, _____ (hereinafter "Defendant"), pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, and hereby requests the Plaintiff, _____ (hereinafter "Plaintiff"), to produce to the undersigned attorneys within thirty (30) days from the date hereof, the following items on the grounds that the items requested contain or constitute material and relevant evidence to this cause and are unavailable to Defendant, and without which Defendant cannot adequately and properly prepare this case:

1. Copies of Federal Income Tax returns, W-2 Withholding Tax Statements, and any and all other business records and/or income records, with evidence of income since the date of your last response and continuing to date.
2. Any and all additional bills and/or estimates of repair to the vehicle and/or damaged property and the cost of temporary or permanent replacement thereof.
3. Any and all additional medical or related bills, paid or owing, allegedly resulting from the within accident or occurrence.
4. Any and all additional medical reports, doctors' reports, or reports rendered by experts applicable to any and all issues of this cause.
5. Any and all additional statements, written or otherwise, made by any and all Defendants in this matter.
6. Any and all additional photographs, graphs, charts and other documentary evidence of the scene, parties or vehicles involved in or pertaining to the subject accident, occurrence or issues of this cause.
7. Any and all additional insurance policies providing benefits or coverage to the Plaintiff(s) for any claimed injury or damage from the subject accident or occurrence.
8. Any and all "Mary Carter" agreements.
9. Any and all records of payments by collateral sources for damages claimed by you as a result of the subject accident.
10. A complete copy of the Plaintiff's 1999 Income Tax Return.
11. Copies of all medical bills incurred by the Plaintiff to date as a result of the subject accident.

12. Copies of any and all medical records relating to the Plaintiff's medical treatment to date for the subject accident.
13. A list of any healthcare providers that the Plaintiff treated with to date as a result of the subject accident.
14. A list of Plaintiff's medical bills incurred for each healthcare provider to date as a result of the subject accident.

This Defendant would show that it is unable to obtain the materials requested without undue expense and hardship. The articles are in the sole or exclusive possession of the Plaintiff(s), their agents or attorneys, and as such these items are necessary for the Defendant to properly prepare their/his/her case.