

DEFENDANTS' REQUEST FOR PRODUCTION
TO THE PLAINTIFFS

COMES NOW, the Defendant, (hereinafter "Defendant"), by and through his/her undersigned counsel pursuant to Florida Rules of Civil Procedure 1.350, 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 the Defendant(s), and without which the Defendant(s) cannot adequately and properly prepare this case:

1. Copies of all tax returns, W2's Forms, or any other evidence of income for all years to date, beginning with the five (5) years preceding the within incident.
2. Withholding statements, pay envelopes, deposit slips, or any other evidence of income earned by Plaintiff(s) for the current calendar year.
3. Copies of any and all medical records, hospital records, emergency room records, and records from any health care provider pertaining to the treatment of Plaintiff(s) for any injuries sustained in the within incident.
4. Copies of any and all medical records, hospital records, emergency room records, and records from any health care provider pertaining to the treatment of Plaintiff(s) for any reason in the five (5) years prior to the within incident.
5. Copies of any and all medical records, hospital records, emergency room records, and records from any health care provider pertaining to the treatment of Plaintiff(s) for any reason since the within incident.
6. Copies of any and all medical bills and/or statements for services rendered, paid or unpaid, as a result of the within incident, including any bills for drugs or other related expenses.
7. Copies of any and all bills, statements or receipts relating to any non-medical expenses claimed as damages in this lawsuit, which have not been produced in response to any of the preceding paragraphs.

8. Copies of bills and/or estimates for the repair of Plaintiff's vehicle and any other damaged property. If the vehicle was not repairable, in addition, attach estimates of the value of the vehicle on the date of the alleged incident and estimates and/or receipts concerning salvage value.
9. Any and all statements, including, but not limited to, recorded telephone interviews, tapes, written statements, whether signed or unsigned, of all witnesses to the incident relative to the subject matter of this action and/or witnesses having knowledge regarding any and all facts and issues in the instant litigation.
10. Any and all photographs, diagrams or sketches of the scene of the accident.
11. Any and all photographs of the vehicles involved in the incident before and after the accident.
12. Any and all photographs of the Plaintiff(s) depicting injuries to Plaintiff(s) sustained as a result of the within incident.
13. Copies of all reports, evaluations, recommendations and/or analysis submitted by any disclosed Plaintiff's expert witnesses regarding the subject accident and/or the Plaintiff's injuries and/or damages allegedly caused by the subject accident.
14. Copies of any and all "Mary Carter Agreements", releases, agreements and/or other documents signed by the Plaintiff, or anyone acting on the Plaintiff's behalf, relating to the subject accident.
15. Any and all photographs, blow-ups, recordings, charts, graphs, sketches and any other tangible items or documentary evidence which you intend to use during the trial of this cause and which have not been produced in response to any of the preceding paragraphs.
16. All policies of insurance providing collateral source payments to Plaintiff(s), including, but not limited to, PIP insurance, medical payment insurance, disability insurance, and/or employment related insurance.
17. All claim forms submitted by Plaintiff(s) pursuant to the policies of insurance referred to in Paragraph 16 above.
18. All statements, including, but not limited to, recorded telephone interviews, tapes, written statements, signed or unsigned, of Defendant(s) or any of their agents, servants or employees relative to the within incident and any other issue which involves the instant litigation.

19. All incident reports filed by Plaintiff(s) for any purpose, including, but not limited to, reports to employer and/or insurance company regarding the incident, if applicable, and/or any other reports filled out by Plaintiff(s).
20. All documents, papers or evidence to be introduced at trial.
21. All expert reports from any experts who will testify at trial.
22. Copy of marriage certificate if a derivative claim is being made for loss of consortium, loss of service, or any other claim by your spouse as a result of personal injury to yourself alleged to be as a result of the within incident.
23. Copies of any and all checks, PIP payout sheets and/or other writings that indicate the amount of money, if any, that the Plaintiff has received as reimbursement for lost wages (past and future), medical bills or other bills for the Plaintiff's PIP insurance policy and/or any other collateral sources.
24. Copies (front and back) of any and all identification cards of the Plaintiff relating to health insurance coverage, automobile insurance coverage, employment benefits, Medicare and/or Medicaid coverage and Social Security benefits depicting the name, address, policy number, claim number(s), identification number of any insurance companies and/or employers which will or may provide the Plaintiff with coverage and/or benefits for the subject accident.