

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

AMY HARRIS,

*

Plaintiff,

*

v.

*

CASE NO.: 24-C-05-0505108.MT

NANCY HARMON, et al.,

*

Defendants.

*

* * * * *

**NOTICE OF PARTY'S ORAL DEPOSITION
AND DEPOSITION DUCES TECUM**

Amy Harris, Plaintiff, by her attorney, Ronald V. Miller, Jr., Esquire, and the Law Office of Miller & Zois, LLC, pursuant to the Maryland Rules of Procedure, requires the following person to produce documents on the date and at the time indicated, at the Courthouse, Circuit Court for Baltimore City, Maryland, 111 N. Calvert Street, Baltimore, Maryland 21202:

DEPONENT: Ronald Smith, M.D.
36 South Charles Street, Suite 808
Baltimore, MD 21202

TIME: 9:30 A.M.

DATE: Monday, February 27, 2006

NOTE: THE DEPONENT NEED NOT PERSONALLY APPEAR IF, PRIOR TO FEBRUARY 23, 2006 PHOTOCOPIES OF THE REQUESTED DOCUMENTS ARE RECEIVED BY UNDERSIGNED PLAINTIFF'S COUNSEL

The deponent, Ronald Smith, M.D., is to produce the following documents at the above-listed time and place:

1. Any and all documents reviewed by you in connection with this case.

MILLER & ZOIS
ATTORNEYS AT LAW
SUITE 1001
7310 RITCHIE HWY
GLEN BURNIE, MD 21061
410-553-6000

2. Any and all documents generated by you in connection with this case, including written reports notes, patient information forms, correspondence, and telephone messages.
3. A copy of the entire chart for Plaintiff in your possession and any notes made in the margins or on the medical records in the chart.
4. A copy of your most recent CV.
5. Copies of all your 1099s received from Law Firms or Insurance Companies for providing expert witness testimony, independent medical examinations, or any other legally related work on behalf of the Plaintiff or the Defendant for the last five (5) years.
6. An up-to-date list of all cases in which you have provided expert testimony for either the Plaintiff or the Defendant by way of trial, video or deposition.
7. Your fee schedule regarding expert witness work, independent medical examinations, and testimony.
8. Your personal Federal and State Income Tax Returns for the past five (5) years.
9. Your business' Federal and State Income Tax Returns for the past five (5) years.
10. A copy of your billing records regarding your work related to this case.
11. Any correspondence to or from the Defendants' attorneys or insurance company relative to this case.
12. Any article, study or research relied upon by you regarding any opinions in this case.

13. Any article, study or research reviewed or relied upon by you to support any opinions that you have reached in this case.
14. Any article, study or research reviewed or relied upon by you in this case that stands for the proposition that the nature and extent of Plaintiff's injuries cannot be permanent for an individual who presents the same symptoms, complaints, and injuries as the Plaintiff.

Respectfully submitted,

MILLER & ZOIS, LLC

By: Ronald V. Miller, Jr., Esquire
Empire Towers, Suite 1001
7310 Ritchie Highway
Glen Burnie, Maryland 21061
410-553-6000
410-760-8922 (FAX)
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first-class, postage prepaid on this 2nd day of February 2006, to:

H. Barritt Peterson, Jr., & Associates
One West Pennsylvania Avenue
Suite 500
Towson, Maryland 21204-5025
Attorney for Defendants

MILLER & ZOIS

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Ronald V. Miller, Jr.