

	*	IN THE
Plaintiff,	*	CIRCUIT COURT
V.	*	FOR
	*	BALTIMORE CITY
Defendant.	*	Case No.:
* * * * *	* * * * *	* * * * *

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: *, Plaintiff*

FROM: *, Defendant*

Pursuant to the Maryland Rules of Procedure, you are required to file within thirty (30) days a written response to each request and to produce those documents for inspection and copying on or before thirty (30) days from the date of this request at the law offices of

Instructions

(a) Your written response shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless the request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, the part shall be specified.

(b) The documents shall be produced as they are kept in the usual course of business, or you shall organize and label them to correspond with the categories in the request.

(c) These requests encompass all items within your "possession, custody or control."

(d) These requests are continuing. If you obtain further material information before trial, you are required to supplement your responses promptly.

(e) If you perceive any ambiguity in a request, instruction or definition, set forth the matter deemed ambiguous and the construction used in responding.

Definitions

(a) Document includes a writing, drawing, graph, chart, photograph, recording, and other data compilation from which information can be obtained, translated, if necessary, through detection devices into reasonably usable form.

(b) Person includes an individual, general or limited partnership, joint stock company, unincorporated association or society, municipal or other corporation, incorporated association, limited liability partnership, limited liability company, the State, an agency or political subdivision of the State, a court, and any other governmental entity.

(c) Occurrence means the incident which is the subject of these proceedings.

(d) The term "you" shall refer collectively to the Plaintiff and the Plaintiff's agents, representatives, or attorneys.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents referred to and relied upon by you in Answering your Interrogatories.

REQUEST NO. 2:

Any and all photographs taken by you or any person in your behalf taken after the occurrence of the scene of the occurrence/incident alleged in the Complaint.

REQUEST NO. 3:

Any and all videos taken by you or any person in your behalf taken after the occurrence of the scene of the occurrence/incident alleged in the Complaint.

REQUEST NO. 4:

Any and all written documents, information and data containing the names and addresses of all witnesses to all or part of the allegations set forth in the Complaint and copies of any and all written data and information obtained from said witness.

REQUEST NO. 5:

Copies of all reports and written data/information taken from all persons who have any knowledge of this occurrence alleged in the Complaint.

REQUEST NO. 6:

All documents and/or written information evidencing, referring to or relating to the factual basis for all claims being asserted by the Plaintiff.

REQUEST NO. 7:

All correspondence to or from any individual who is expected to testify as an expert witness at trial on your behalf.

REQUEST NO. 8:

All documents provided by you to any individual who is expected to testify as an expert at trial on your behalf.

REQUEST NO. 9:

All documents reviewed by any individual who is expected to testify as an expert witness at trial on your behalf.

REQUEST NO. 10:

The most recent resume or curriculum vitae of each expert whom you expect to call as an expert witness at trial.

REQUEST NO. 11:

All written or recorded statements of this party, or of any agent, representative or employee of this party, concerning the subject matter of this action.

REQUEST NO. 12:

All document or tangible evidence which you claim supports your contention that Defendants were negligent or otherwise caused or contributed to the damages allegedly sustained in the Complaint.

REQUEST NO. 13:

Each of the documents which are or which you contend may be or which you believe, assert, allege or infer may tend to support any one or more of the facts which in this cause are or may be either necessary or beneficial, in the proof of the case of the party to whom this Request is made, or to any other opposing party.

REQUEST NO. 14:

All documents which are or which may tend to be documents which may reasonably lead to the discovery of other documents or information concerning any of the subject matter contained in either: (I) this Request for Production of Documents or (II) the Interrogatories filed in this cause by the Defendant.

REQUEST NO. 15:

All documents which are or may in any way be relevant to any damages, set-offs, claims, or other financial detriment of any sort or kind, in which the party to whom these Interrogatories are addressed or any other opposing party in this cause believes, asserts, contends, knows, or alleges, to either (I) support, evidence, show, infer, or to reveal, or to (II) contradict, dispute, or otherwise discredit any of the aforesaid. This request shall include but not in any way be limited to an itemization of such damages, claim, set-offs, or other financial detriment known, claimed, asserted, or believed to be the result of any action taken, or inaction, by the Plaintiff.

REQUEST NO. 16:

All documents that constitute, relate or refer to an investigation of or an inquiry into the incident giving rise to the claims stated in the Complaint herein.

REQUEST NO. 17:

All reports made by any expert witness inclusive of any opinions and facts upon which such expert is expected to testify at the time of the trial of this matter, including any and all handwritten or typed notes prepared by the expert in connection with his review and evaluation of materials, including but not limited to records, of the above captioned matter.

REQUEST NO. 18:

All records pertaining to any examination of the Plaintiff, by any medical or health care provider, vocational rehabilitation counselor, economist, or other expert witness.

REQUEST NO. 19:

All treatises, texts, articles or other scholarly works relied upon by any expert witness in arriving at the expert's opinion(s) in anyway related to this case.

REQUEST NO. 20:

Any and all documents related to or connected with any claims which you have made or filed with any insurance company within the past five (5) years.

REQUEST NO. 21:

Any and all statements, documents, papers, records and writings of or in any way relating to any physical or mental disability you had which may have affected your physical abilities on the date of the occurrence, or for five (5) years prior thereto, including the nature of the disability, the dates

thereof and all records from any hospital, doctor or other health care provider whom you consulted relative to such condition.

REQUEST NO. 22:

All medical records, surgical records, mental illness records, x-rays, radiographic films, pathology materials, or any other records or materials related to any diagnostic or treatment tests or procedures, financial records, bills, invoices, writings, notes or memorandum relating to all of your physical, medical or mental conditions, illnesses or disabilities, including but not limited to those doctors, nurses, practitioners, hospitals, clinics, institutions or other health care providers or third party private or governmental health or accident insurers, (without regard to whether it is your contention that such physical, medical or mental conditions, illnesses or disabilities were caused in any way by any of the parties' hereto or any agent or employee of the parties' hereto) (a) for a period of five years before and up to the date of the occurrence alleged in the Complaint, (b) for a period of time commencing on the date of the occurrence alleged in the Complaint up to and including the present date.

REQUEST NO. 23:

Any and all diaries, accounts, statements, documents, papers, records and writings of or in any way relating to this case.

REQUEST NO. 24:

Any and all reports, evaluations, written conclusions, test results or reports prepared by health care professionals with regard to any injury, illness, or other treatment received by you for the ten (10) year period prior to the occurrence.

REQUEST NO. 25:

Any and all documents supporting your contention that you lost time from work as a result of the subject occurrence.

REQUEST NO. 26:

Any and all physical evidence or tangible objects which you intend to offer into evidence at the trial of this case.

REQUEST NO. 27:

All documents setting forth all liens held by any person/entity claiming to have a financial interest in the outcome of this action.

REQUEST NO. 28:

Your federal, state and local tax returns for each of the five years preceding the occurrence and all years subsequent to the occurrence, including W-2, IRS Form 1040 and supporting documentation.

REQUEST NO. 29:

All documents concerning any claim(s) for pension, unemployment, income replacement insurance benefits and/or private short and/or long term disability benefits by you, including but not limited to any applications, medical records submitted and correspondence prepared or received by you concerning the same.

REQUEST NO. 30:

All documents supporting any claim(s) for Social Security Disability benefits and/or Supplemental Security Income by you, including but not limited to any applications and medical records submitted, any responses received from Social Security, any hearing notices, and any

correspondence prepared or received by or on behalf of you concerning the same.

REQUEST NO. 31:

All documents pertaining to any claims made or benefits and/or compensation received as a result of any injuries or accidents either before or after the subject occurrence.

REQUEST NO. 32:

Any and all documents regarding the nature and amount of all expenses and monetary losses or damages which you contend were incurred by you or on your behalf as a result of the subject occurrence.

Attorneys for Defendant