

**IN THE CIRCUIT COURT OF MARYLAND
FOR WASHINGTON COUNTY**

JOHN DOE

Plaintiff,

v.

JANICE TORTFEASOR

Defendant.

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Case No.: 21-C-17-060836

**PLAINTIFF'S REQUESTS FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT**

TO: JANICE TORTFEASOR, Defendant

FROM: JOHN DOE, Plaintiff

You are requested to file within thirty (30) days a written response to requests on the attached Document Schedule and to produce those documents for inspection and copying within thirty (30) days of service of this Request at the Law Offices of Miller & Zois, LLC, One South Street, Suite 2450, Baltimore, Maryland 21202.

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

(b) In accordance with the Maryland Rules, 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 shall encompass all items within your possession, custody or control.

(d) These requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.

(e) If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous in the construction used, in responding.

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

(a) The term "person" includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, state, which agencies or political subdivisions, and court, or any other governmental entity.

(b) The terms "you" or "your" include the persons to whom these requests are addressed, and all that person's agents, representatives or attorneys.

(c) In accordance with the Maryland Rules, the terms, "document" or "documents" includes all writings, drawings, graphs, charts, photographs, recordings, and any other data computations from which information can be obtained, translated, if necessary by (you), through detection devices, into reasonably usable form.

(d) The term "occurrence" means the incident complained out in the Plaintiff's complaint.

DOCUMENTS TO BE PRODUCED

1. All documents identified in your answers to Interrogatories.
2. All written, recorded and/or signed statements of any person, including the Plaintiffs, Defendant, witnesses, investigators or any agent, representative or employee of the parties, concerning the subject matter of this action.
3. All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiffs, or other damage.
4. Any documents which afforded liability insurance for the incident which is the subject matter of the Plaintiffs' Complaint.
5. Any documents received pursuant to any subpoena request of any party.

6. Any document prepared during the regular course of business as a result of the incident complained of in the Plaintiffs' Complaint.

7. Copies of any treatises, standards in the industry, legal authority, rule, case, statute or code that will be relied upon in the defense of this case.

8. All maintenance records concerning the vehicle and equipment used by the Defendant on the date of the accident for the two (2) years prior to the accident.

9. Any and all invoices, logs, sales receipts, itineraries or schedules for the Defendant if the Defendant was driving and operating equipment in the scope of his employment.

10. Your cell phone records, including call logs and data usage logs, for the day of the accident.

EXPERT WITNESS DOCUMENTATION

1. All written reports, and drafts, of each person whom you expect to call as an expert witness at trial.

2. All documents upon which any expert witness you intend to call at trial reviewed to form any opinions.

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

4. Any list of cases maintained by any expert witness identified in which the witness has testified as an expert at trial or by deposition.

5. All written reports, including drafts, of each expert you intend to call at trial.

6. All notes, diagrams, photographs, medical records, medical bills, medical literature, case studies, research articles, x-rays, radiological films or any other documents prepared or reviewed by each person whom you expect to call as an expert witness at trial.

7. All bills or invoices generated by each expert witness for performing expert witness services for you in this case, including but not limited to, the fees for the medical examination, the records review, the

pretrial preparation, any telephone conference, any trial testimony anticipated, and any other fee or bill paid by the Defendant for forensic services.

8. Any and all correspondence, including e-mails, etc., exchanged between representatives for the Defendant and each expert.

9. The current fee schedule for each expert whom you expect to call as an expert witness at trial.

10. 1099 forms for each expert witness sent by any insurance company or law firm that compensated the expert for forensic work performed for the last two years.

11. Quickbooks, Quicken, Timeslips, or any other accounting documents that demonstrate each of Defendant's expert's fees associated with forensic work.

12. Tax returns for the past three years documenting payments from any insurance company to each expert whom you expect to call as an expert witness at trial.

JUSTICE, WHITE & SMITH, LLC

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