In the circuit court of jackson county, missouri

at KANSAS CITY

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| Sally g. hurt,Street AddressCity, State, ZipPlaintiff,v.John DoeServe at: Street AddressCity, State, ZipDefendant. | Case No. Division  |

**plaintiff’s requests for production to defendant**

Pursuant to Rule 58.01, Plaintiff requests that Defendant produce and permit Plaintiff to inspect and copy the original, or original copies of the following designated materials at the Law Office Name, Street Address, City, State, Zip, within 45 days after service hereof with the Petition.

1. Any report made by anyone to the police, state highway patrol, sheriff, or any other law enforcement or public official, or regulatory agency, or any report made by such officials concerning the incident alleged in the plaintiffs' petition.

RESPONSE:

1. Photographs, motion pictures or other visual reproduction of the incident or the scene of the incident stated in the petition.

RESPONSE:

1. Photographs of all the automobiles of involved in the collision described in Plaintiff’s petition that show either damage or lack of damage resulting from the occurrence described in Plaintiff’s petition.

RESPONSE:

1. Photographs, motion pictures or other visual reproduction of Plaintiff.

RESPONSE:

1. Statements previously made by Plaintiff concerning the subject matter of this lawsuit, including any statements regarding how the incident described in Plaintiff’s petition occurred or any injuries or harms that resulted from the incident described in Plaintiff’s petition. This request includes any written statement signed or otherwise adopted or approved by the Plaintiff and any stenographic, mechanical, electrical or other type of recording or any transcription made by Plaintiff about any issues regarding this lawsuit and contemporaneously recorded.

RESPONSE:

1. Statements obtained from any witness to the occurrence described in Plaintiff’s petition that are not privileged or were obtained by you in the ordinary course of your business and which have been recorded or reduced to writing in some fashion.

RESPONSE:

1. Any medical reports or medical records relating to the Plaintiff in the possession of the Defendant whether or not such records or reports are for injuries sustained in this incident unless previously obtained by the Defendant from the undersigned counsel.

RESPONSE:

1. Copies of any employment records relating to the Plaintiff that have been obtained by the Defendant unless such records were actually produced by the undersigned counsel.

RESPONSE:

1. All drawings, graphs or charts of the scene of the incident described in plaintiffs' petition.

RESPONSE:

1. All documents evidencing damage to any person or thing involved in the incident described in plaintiffs' petition.

RESPONSE:

1. Any and all documents, transcripts, photographs, and information provided to any person you intend to call to give expert testimony at the trial of this matter.

RESPONSE:

1. All reports prepared by all experts you intend to call to give testimony at the trial of this matter.

RESPONSE:

1. A curriculum vitae or resume for each individual whom you expect to call as either a retained or non-retained expert witness at the trial of this case.

RESPONSE:

1. Any and all notes, recordings, photographs and information gathered by your experts and relied on in their opinions.

RESPONSE:

1. The title of the vehicle Defendant was driving at the occurrence described in Plaintiff’s petition.

 RESPONSE:

1. If the Defendant was not the owner of the vehicle Defendant was driving at the occurrence described in Plaintiff’s petition, the registration form or certificate of title of such vehicle.

RESPONSE:

17. The driver’s license record for Defendant from 2004 to the present.

RESPONSE:

18. A copy of Defendant’s driver's license, front and back.

RESPONSE:

19. Copies of all policies that may provide insurance coverage to Defendant for the incident described in Plaintiff's petition.

RESPONSE:

20. Any contract of employment or agency agreement in affect on the date of the occurrence described in Plaintiff’s petition that would govern relationship of Defendant with any other party or bear on the issue of scope of employment.

RESPONSE:

 21. All insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment that may be rendered in the action or to indemnify or reimburse for payments made to satisfy the judgment, including but not limited to any liability insurance policy that names the Defendant as a named insured whether or not said policy excludes or limits coverage where multiple vehicles or policies are involved, covers the automobile being driven by Defendant at the time in question, and names or extends coverage under an umbrella or general commercial policy.

RESPONSE:

22. Itemized billing statements for any cellular or mobile phones that were in Defendant’s possession or which were inside the vehicle Defendant was operating at the time of the occurrence described in Plaintiffs’ Petition occurred for the month in which the incident described in Plaintiffs’ Petition occurred.

RESPONSE:

23. All documents identified by you in your answers to Plaintiff’s interrogatories.

RESPONSE:

24. All documents you are requested to identify in the interrogatories from the Plaintiff to you.

RESPONSE:

Respectfully submitted,

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