

**IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS**

JOHN D. DOE, )  
Plaintiff, ) Case No.  
vs. )  
THOMAS M. SMITH, )  
Defendant. )  
\_\_\_\_\_  
)

**Requests for Production from Defendant to Plaintiff**

**I. General**

REQUEST NO. 1: Copies of any and all statements of witnesses to the occurrence in question.

REQUEST NO. 2: Copies of any and all statements of parties to the occurrence in question.

REQUEST NO. 3: Copies of any and all reports of expert witnesses and all material received or created by said experts in the course of formulating any opinion relating to this case.

REQUEST NO. 4: Copies of any and all medical reports pertaining to injuries sustained by plaintiff in the instant case.

REQUEST NO. 5: Copies of any and all medical records of plaintiff for the ten (10) years last preceding.

REQUEST NO. 6: Copies of plaintiff's income tax returns for the five (5) years last preceding.

REQUEST NO. 7: Copies of any and all Workers Compensation records, including accident reports, medical records, and Form 88's, in connection with any claim you have made for workers compensation benefits.

REQUEST NO. 8: Any and all photographs of the scene and/or premises of the occurrence in

question.

REQUEST NO. 9: Any and all photographs of vehicles and/or objects involved in the occurrence in question. (Objects include, but are not limited to: products, premises, “striking” instrumentalities, “piercing” instrumentalities, etc.)

REQUEST NO. 10: All video tapes of any object or vehicles involved in the occurrence. (Objects include, but are not limited to: products, premises, “striking” instrumentalities, “piercing” instrumentalities, etc.).

REQUEST NO. 11: Plaintiff’s entire personnel file and complete wage records from plaintiff’s employers for the ten (10) years last preceding.

REQUEST NO. 12: All diagrams of the scene of the occurrence.

REQUEST NO. 13: All video tapes of the scene of the occurrence.

REQUEST NO. 14: All video tapes of any party showing their physical condition in any respect.

REQUEST NO. 15: All repair estimates, evaluations, bills, or appraisals to any property of anyone involved in the occurrence in question.

REQUEST NO. 16: Provide before the occurrence and after the occurrence photos of the plaintiff.

REQUEST NO. 17: Provide of any insurance claim file of any kind relating to the occurrence.

REQUEST NO. 18: Provide all documents including sales tickets, invoices, warranties, owner’s manuals instructions, receipts for payment and correspondence from the manufacturer or seller, relating to the sale, maintenance and/or repair of the object or objects (including but not limited to motor vehicles, if applicable) involved in the occurrence in question.

REQUEST NO. 19: Allow physical inspection and examination of all relevant objects or portions thereof in your possession which were involved in the occurrence in question.

REQUEST NO. 20: Provide all documents designated in your answers to interrogatories.

REQUEST NO. 21: Any and all personal notes, memoranda, diaries, personal journals, appointment books, reports, correspondence, notes and other documents which were prepared and/or maintained by Plaintiff which relate in any way to the claims in this lawsuit.

REQUEST NO. 22: Any and all documents which plaintiff intends to use at the trial of this action.

REQUEST NO. 23 A copy of your most current C.V. in the form required by DCR 3.211.

REQUEST NO. 24: A copy of any reports, summaries, notes, recordings, (including audio, video, computer and other means of preservation) writings, or letters that you have obtained in this case from or were prepared in this case by an expert or experts that may provide testimony at trial that directly relates to or forms the basis of the opinions expressed by the expert or experts.

The response shall meet the requirements of DCR 3.211.