

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

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

**Requests for Production from Plaintiff to Defendant**

1. Any and all policies of insurance, including the declaration pages, which may provide coverage to the defendant for the injury and damage alleged by the plaintiff, it is intended that this include all primary and excess insurance policies.
2. Any and all statements obtained from any witness who was or claims to have relevant information on any issue which is the subject matter of this lawsuit.
3. Any and all statements which were executed by the defendant and in any way concern the issues which are the subject matter of this lawsuit.
4. Any and all statements which the plaintiff may have made to anyone which in any way concern the issues which are the subject matter of this lawsuit.
5. Any and all reports or other documents prepared by a law enforcement agency concerning the subject occurrence.
6. Any and all reports or other documents prepared by the defendant concerning the subject occurrence.
7. Any and all photographs of the scene of the occurrence which is the subject matter of

this lawsuit, of plaintiff's injuries, of the vehicles or objects involved or of any other object which may be relevant to the issues in this lawsuit. It is intended that this request include any photographs whether taken by or in the possession of defendant's insurance carrier, attorney or himself.

8. Any and all documents, including photographs, dealing with or relating to vehicle or other property damage sustained in the occurrence which is the subject matter of this lawsuit including all documents dealing with or relating to repair of the property damage, salvage of the property or replacement of the property.

9. Any and all reports or other documents made by any expert or lay person who reviewed or investigated this matter on behalf of the defendant or the defendant's insurance company.

10. Any and all documents which defendant intends to use at the trial of this action.

11. Any and all documents of any insurance company or adjusting company which reviewed or investigated the subject occurrence.

12. Diagrams, reports, notes, specifications, records, written statements and photographs regarding the subject occurrence contained in the investigative file of the defendant's liability insurance carrier.

13. Any and all certificates of title and license registration documents for the automobile involved in the occurrence which is the subject matter of this lawsuit.

14. Your license(s) to operate or drive a motor vehicle.

15. Your driving record for each state in which you were licensed to drive or operate motor vehicles from five-years preceding the occurrence which is the subject matter of this lawsuit to the present.

16. Any and all documents dealing with or relating to any prescription medicines or drugs you consumed or used during the 24 hour period immediately preceding the occurrence which is

the subject matter of this lawsuit.

17. Any and all repair bills, records, statements or logs during the period of three years prior to and one year subsequent to the occurrence which is the subject matter of this lawsuit.

18. Any and all certificates or licenses for you to operate a commercial motor vehicle on the date of the occurrence which is the subject matter of this lawsuit.

19. Any and all records or testimony given at a prior hearing regarding the occurrence which is the subject matter of this lawsuit.

20. Any agreement, compromise or arrangement with any person regarding the occurrence which is the subject matter of this lawsuit.

21. Any and all medical records of defendant regarding a physical infirmity, disability or sickness during the period of three years prior and one year subsequent to the occurrence which is the subject matter of this lawsuit.

22. Any and all medical records regarding your eyeglasses or contact lenses.

23. All documents which support your claim of comparative fault in this matter.

24. All documents which support your defenses in this matter.

25. The original records pertaining to the Plaintiff for the purposes of inspection, review and comparison to the photocopied records in possession of plaintiff.

26. A copy of any reservations or rights issued to you by any insurers, which apply to this claim made in this matter.

27. Any and all personal notes, memoranda, diaries, personal journals, appointment books, reports, correspondence, notes and other documents which were prepared and/or maintained by Defendant which relate in any way to the claims in this lawsuit.

28. A copy of the charter of Defendant Hospital.

29. A copy of the bylaws of Defendant Hospital.

30. A copy of each exhibit listed on your preliminary and final exhibit list.
31. A copy of each report, statement, or transcript of each and every interview conducted in this matter other than those conducted by or at the direction of the attorney for defendant.
32. A copy of each statement given by the plaintiffs.
33. A copy of your most current C.V. in the form required by DCR 3.211.
34. A copy of any ~~expert~~ 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 such an expert or experts that may provide testimony at trial that directly relates to or forms the opinions expressed by the expert. The response shall meet the requirements of DCR 3.211.
35. A copy of any depositions that you have given in the past as an expert, or as a defendant in a medical negligence case.
36. A copy of any articles, texts, abstracts, or reports prepared by any experts which relate to the subject matter of this litigation or the subject matter of the experts testimony.
37. A copy of each deposition given by each expert retained relating to the subject matter of this litigation.