

**IN THE CIRCUIT COURT OF THE _____ JUDICIAL CIRCUIT
IN AND FOR _____ COUNTY, FLORIDA
CIVIL DIVISION**

Plaintiff,

v.

Case Number:

_____, and

Defendants.
_____ /

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION TO DEFENDANT

Pursuant to Rule 1.350, Florida Rules of Civil Procedure, Plaintiff, _____, hereby requests Defendant, _____, produce the following items, for inspection and/or copying by the undersigned attorney:

1. The original policy(ies), declaration page(s), and any additions to the policy that did insure defendant at the time of the accident described in the Plaintiff's complaint.
2. All original photographs which pertain to any aspect of the accident described in the plaintiff's complaint. This request includes, but is not limited to, vehicle property damage, other property damage, accident scene photographs and/or injuries or physical condition of any person involved in the accident.
3. All surveillance films, surveillance reports and/or invoices for payment by defendant or defendant's insurer for any surveillance that was done on the plaintiff.
4. A copy of the title to the vehicle defendant was driving on the date of the subject accident.
5. A copy of defendant's driver's license.
6. A copy of defendant's social security card.
7. Any and all property damage estimates, appraisals, invoices, repair bills, or any other document or thing pertaining to any and all property and/or vehicles damaged as a result of the subject accident.
8. Any transcripts and/or original recorded statement or written statements taken from any person, including plaintiff, which pertains to any aspect of the accident described in the complaint.

9. Any and all records, reports or correspondence relating to any similar accidents involving defendant.
10. Any and all photographs, drawings, graphs, charts and other documentary evidence of the scene, parties or vehicles, if applicable, involved in or pertaining to any aspect of the accident described in the complaint.
11. A copy of the traffic crash report, police report, incident report or any other report from any governmental agency relating to the collision described in the complaint.
12. A copy of any and all wireless telephone records for the day in which the subject incident occurred.
13. If defendant is claiming an injury as a result of the subject accident, a copy of any and all medical records, notes, bills or any other document relating to said injury.
14. All documents identified in your answers to interrogatories.
15. All documents upon which any expert witness you intend to call at trial relied to form an opinion.
16. The most recent resume or curriculum vitae of each expert whom you expect to call as an expert witness at trial.
17. All invoices generated by expert witnesses generated for performing all expert witness services to the defendant, 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 paid by the defendants for expert fees.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished along with the Complaint, Interrogatories, and Request for Admissions.

George C. Andriotis, Esq.
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