

March 25, 2019

***Re: Response to Combined Discovery Demands***

Dear Client:

Enclosed please find the defendant's Combined Demands for Discovery and Demand for a Verified Bill of Particulars with regard to the above-referenced matter.

Please note that the enclosed documents constitute what is commonly referred to as discovery. Discovery is the method by which one party "discovers" information about the other party through various methods of documentary inquiry, most commonly including, but certainly not limited to, questions (known as "EBT" or "depositions") and requests for production of documents.

In some instances, discovery requests may be legally objectionable. That is a determination for me to make. I thus request that you answer ***all*** questions and produce ***all*** documents to the best of your ability, unless you feel that you cannot due to expense, availability or other issues you may have, in which case I request you contact my office so that we may discuss and resolve the matter immediately. Finally, I may modify your responses as I deem appropriate to your case.

We generally have a period of 20 days from the date the demands were mailed to me to formally respond. It will therefore be necessary for you to review this document and make your responses to me in the next few days, which will allow my staff sufficient time to type up and prepare formal responses. Please note that the more organized your responses are, the less work and organization I have to do, and the better more accurate work product will result from it.

Regarding your responses to the requests for document production:

Please correspond the documents you provide me with the number of the request you are answering. If possible, ***please do not furnish originals***. It would be more cost effective for you to provide me two copies of each document, as my assistant will not be spending time copying documents. Additionally, please do not staple any documents or make double-sided copies. Ideally, the documents should be submitted to me in two separate stacks. Each stack should be identical. Each response to a specific number should be paper-clipped together with a blank sheet of paper on top indicating which number the documents belong to, (*i.e.*, response to number 1, response to number 2, etc.). If the documents requested are not in your possession or do not apply, please indicate the same. Do not leave any blanks to any questions. Please rubber band the finished stack together so the two stacks of documents are easily identifiable. Please make sure you deliver the documents to my legal assistant.

Regarding the Combined Demands:

Statements: Provide copies of any relevant text messages or e-mails you have received from Plaintiff, if any.

Witnesses: Please provide me with the names, addresses, and phone numbers of any witnesses you may wish to call at trial. Please also set forth a synopsis of why you want to call this witness and what it is you expect him/her to say. It is better to be over-inclusive if there is even a small chance you may want this person to testify. Failure to disclose a potential witness may result in them being precluded from testifying.

Videos/Photos/Surveillance Materials: Provide copies of any relevant photos, videos, etc. of the scene or of your injuries that are relevant to this matter.

Expert Witnesses: Please do not concern yourself with this item as I will respond accordingly.

Regarding the Verified Bill of Particulars:

This is one of the most important documents related to your case. It is in this document where we set forth all of your damages. Damages are both the injuries that you incurred as well as what you feel you are entitled to at trial as compensation. Examples of monetary damages are: pain and suffering, out of pocket expenses for prescriptions, doctor's visits, medical devices, etc.. The more details that we can put in a Bill of Particulars regarding your medical treatment and out of pocket expenses the better position you will be in. I have attached a draft of the Bill of Particulars. Most of this information I have taken from my notes and the medical records that I have collected. Please review this in detail and let me know if I am missing any doctor's information or treatments that you have undergone.

I look forward to your responses, and should you have any questions or need to go over any of these items with me, please feel free to contact me. As always I am

Very Truly Yours

**SCHOPF LAW, PLLC**

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Jonathan G. Schopf

Enc.