

Thank You for retaining the law firm of **EPSTEIN SHAKH, LLP**. For over a decade, we have been a premier personal injury law firm in New York State, and have recovered tens of millions of dollars in compensation for our clients.

EPSTEIN SHAKH, LLP
150 Broadhollow Road, Suite PH-4
Melville, New York 11747
T. (516) 447-6688
F. (516) 447-6689
M. (917) 257-9104
E. info@eslawny.com

THINGS YOU SHOULD NOT DO:

- Do not give any statements (written, recorded, or oral) to anyone concerning your accident or injuries without first getting our approval.
- Do not make any incorrect statements about prior injuries or accidents to any doctor who treats or examines you. If you don't remember, say so.
- Do not change your address or employment without notifying your attorney.

FIVE BIG MISTAKES CLIENTS MAKE:

- Not seeing the doctor if you are in pain.
- Not doing what your doctor tells you.
- Not keeping your doctor's appointments.
- Discussing your case with anyone other than your attorney or your doctor.
- Failing to tell your doctor about medical problems due to the accident.

BE CAUTIOUS OF INSURANCE COMPANIES:

It's not unusual for insurance companies to engage in aggressive tactics to pressure a victim into harming their own case. One familiar tactic is to record phone calls where a skillful adjuster may make you feel as if you are talking to a caring and helpful person. By lulling you into a sense of security, the insurance company may hope that you let your guard down and make statements that contradict physical evidence or other statements. Other strategies include sending investigators to the hospital, home, or place of work. You should politely direct any unknown persons to your attorney who will know what you should say and when you should say it. Never deal with these agents without sound legal advice.

DO NOT ACCEPT ANY MONEY OR SETTLEMENT:

Insurance companies may offer you an "early settlement" or compensation for your "troubles". Do Not Accept It. Do Not sign any Release forms without speaking to us first.

QUESTIONS MOST CLIENTS ASK:

Why Does It Take So Long?

We cannot prove your claim until after the doctors have given us reports stating exactly what your medical condition is and what they expect it to be in the future: in other words, until you have reached "maximum medical improvements." Many times the doctors will be very slow in making these reports. We may even, on occasion, ask you to contact your doctor to speed up this report. If we try to settle your case before your medical condition is stabilized, you may lose money that you might be entitled to for a condition that did not show up until after your case was settled.



ATTORNEYS AT LAW

It is important to know that your case will not be settled until the damages have been determined and all investigations to determine who is liable have been completed. It generally takes several months to gather the necessary information. If a trial becomes necessary, it can take several years to complete a case. One of the most difficult requests we make of you is to have patience. We will work as hard and fast as possible to settle your case quickly.

YOU MAY REACH US AT

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THINGS WE NEED TO KNOW

- If your address, telephone/cell phone number, or email change.
- If you are out of work as a result of your accident, and your employment information.
- If your vehicle has been towed from the scene of the accident and if it sustained property damage.
- If you intend to pursue a claim with your own insurance company to repair your vehicle.
- If you had any subsequent accidents, after the one where we represent you.
- If you were recommended to undergo a surgery or injections.
- If you received bills from a hospital, ambulance company, or a medical provider.
- If an insurance representative calls you.
- If you receive mail/correspondence from insurance company.
- If you receive an IME (Insurance Medical Examination) Notice.
- If you were served with a lawsuit as a result of the accident.

THINGS YOU NEED TO KNOW ABOUT YOUR IME EXAM

- If you miss your IME (Insurance Medical Examination), it may be deemed as non-cooperation.
- Your insurance company may deny benefits and refuse to pay for your medical treatment if you do not attend your IME.
- If you had surgery or injections, let us know and we will reschedule your IME
- This is not a regular examination, and the examiner is not your doctor.
- Do not assume the physician has your interests at heart and will be frank and fair in documenting his/her findings. Therefore, all your physical complaints must be expressly verbalized, regardless of how insignificant they may be.
- You will be asked to complete a questionnaire before your examination. Please **do not** enter any information regarding your employment, employment status, prior accidents or injuries, prior medical conditions, medications you take or took that are not related to injuries in this claim, or any information about subsequent accidents/injuries you may have had after this accident.
- Bring your ID (it can be a driver's license or any other state or government ID).
- Do not bring any medical records, films, MRIs., etc.
- Please be on time and try to arrive at least fifteen (15) minutes prior to your appointment.

THINGS YOU NEED TO KNOW ABOUT YOUR DEPOSITION

- When you get a letter from our office with the date for your deposition, call us and confirm your availability.
- Let us know if you will require a translator.
- Our attorneys will prepare you one (1) day before and again at least one (1) hour prior to the deposition

THINGS TO REMEMBER



Make sure your social media is private
Do Not post any photos of yourself on vacations, parties or at the gym.



We prove your case with medical records.
Your medical treatment is very important.



If you had a prior case or injury, we must know about it.
If you had a subsequent accident, call us.