



# BREAKDOWN OF A LEGAL COMPLAINT

A Guide to Understanding  
Each Section



- IDENTIFIES THE COURT, PARTIES INVOLVED, AND CASE NUMBER.




- USUALLY APPEARS AT THE TOP OF THE DOCUMENT.

CAPTION/TITLE

# INTRODUCTION/PRELIMINARY STATEMENT

- Summarizes the nature of the complaint and the claims being made.

# CAPTION

- ▶ At the top of the Complaint, a heading or “caption” states the court’s name, identifies the parties (plaintiff and defendant), and, once the clerk files it, includes the case number. This case number becomes the lawsuit’s unique identifier throughout the court’s system. Accuracy here is crucial. A minor misspelling of a party’s name or listing the wrong county can lead to confusion, so the paralegal double-checks everything before submission.
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JURISDICTION GENERALLY FALLS INTO TWO CATEGORIES: **SUBJECT MATTER JURISDICTION** (THE COURT'S POWER TO HEAR THE TYPE OF CASE) AND **PERSONAL JURISDICTION** (THE COURT'S AUTHORITY OVER THE DEFENDANT). SMALL CLAIMS/COUNTY/CIVIL

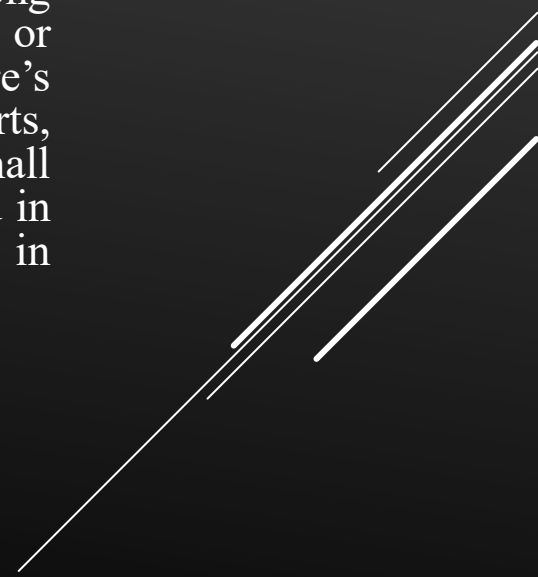
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**VENUE** FOCUSES ON THE GEOGRAPHICAL LOCATION. COURTS TYPICALLY REQUIRE THAT THE LAWSUIT BE FILED IN A COUNTY OR DISTRICT CONNECTED TO THE DISPUTE—PERHAPS WHERE THE DEFENDANT RESIDES, WHERE THE PLAINTIFF LIVES, OR WHERE THE EVENTS OCCURRED.

## JURISDICTION AND VENUE

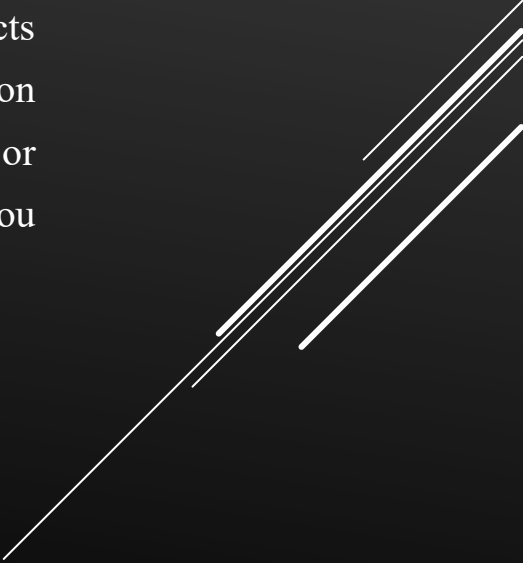
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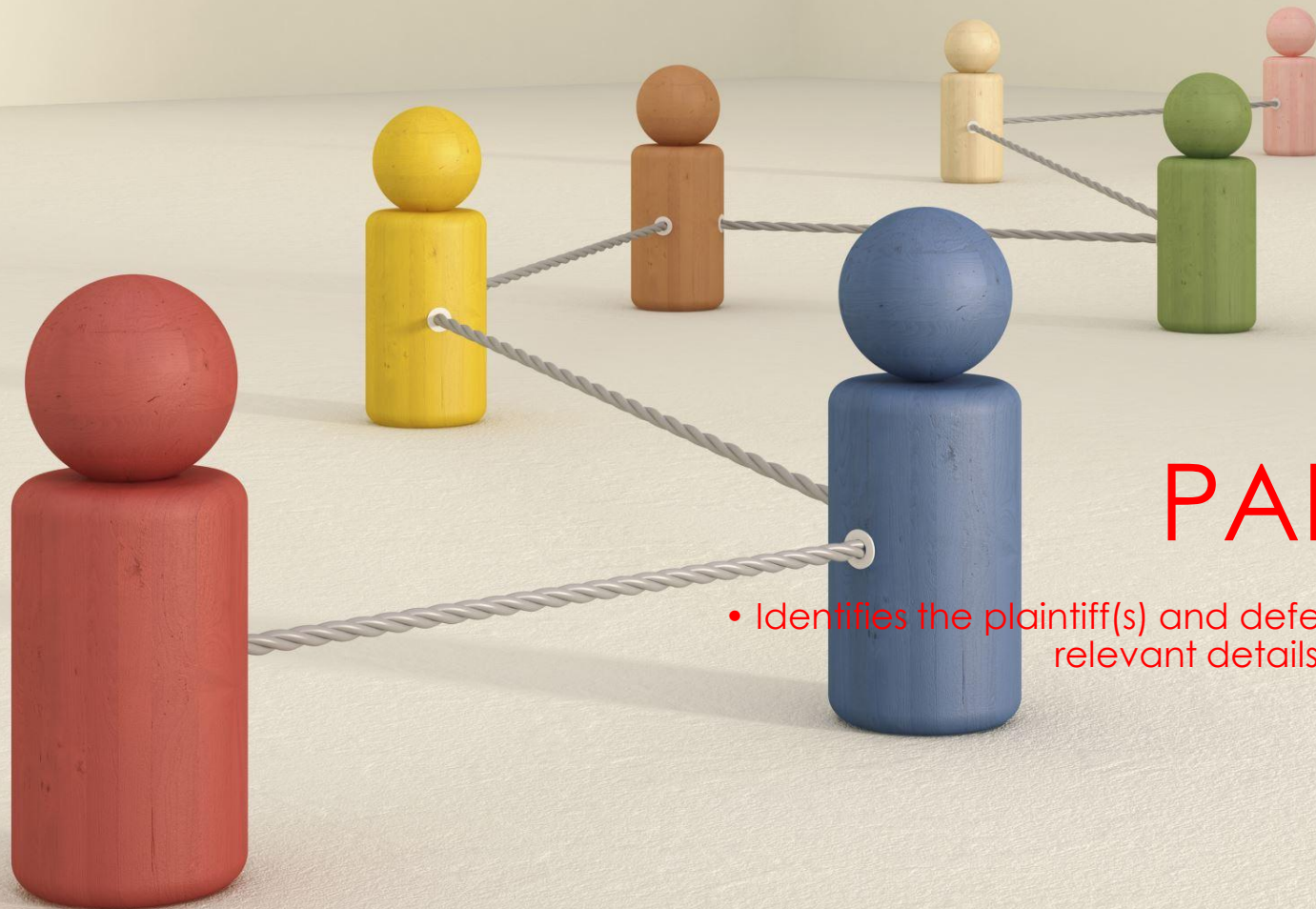
# JURISDICTION

- ▶ Before crafting any words of the Complaint, a paralegal helps verify that the selected court can legally hear the case. Jurisdiction generally falls into two categories: **subject matter jurisdiction** (the court's power to hear the type of case) and **personal jurisdiction** (the court's authority over the defendant). State courts handle most civil disputes, from personal injury to contract breaches, while federal courts require a federal question (like a claim under federal law) or diversity of citizenship (parties from different states with a certain amount in controversy). If the lawsuit is filed in the wrong court—whether that's because the monetary value is too low or high, or the defendant isn't subject to that court's authority—there's a chance the case will be dismissed or transferred. In Florida courts, if the value of a case is under \$8,000 it would be filed in the Small Claims Court, if over \$8,000 but under \$50,000 it would be filed in the County Court and anything over \$50,000 would be filed in Circuit Civil.
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# VENUE

► **Venue** focuses on the geographical location. Courts typically require that the lawsuit be filed in a county or district connected to the dispute—perhaps where the defendant resides, where the plaintiff lives, or where the events occurred. Paralegals confirm these details by searching the USPS website for an accident address or a defendant's home address, thus confirming the county boundaries. If the defendant is a business, paralegals often consult the state's corporate registry to see the official address listed for the company, verify where it conducts business, and determine the identity of the registered agent (the person authorized to receive legal documents). Tip: To find the county of a business or person, go to USPS and look up the address – When you open the results, you will see the county.





# PARTIES

- Identifies the plaintiff(s) and defendant(s) with relevant details about each.



# PARTIES

- ▶ After establishing jurisdiction and venue, the Complaint names and describes each party. If the plaintiff is an individual, their residency might be noted; if it's a corporation, the document could mention the state where the company is incorporated or its main office. For defendants, especially business entities, the paralegal might confirm details like "ABC Corporation, a Florida corporation with its principal place of business in Orlando, Florida, and a registered agent located at 123 Main Street." Getting this information right ensures proper service of process later.

# STATEMENT OF FACTS

- Describes the events leading to the complaint in a factual, chronological manner.

# FACTUAL ALLEGATIONS

- ▶ Next, the Complaint narrates the key facts of the dispute in a concise, logical order. If it's a personal injury case, it might describe the day the plaintiff slipped on a wet supermarket floor, specifying the time, date, location, and conditions. For a contract breach, it would detail the nature of the agreement, when each party signed it, and how the defendant allegedly failed to fulfill their obligations. The goal here is clarity. A strong factual section makes it easy for the court and the defendant to understand exactly what happened and why the plaintiff believes they were harmed.

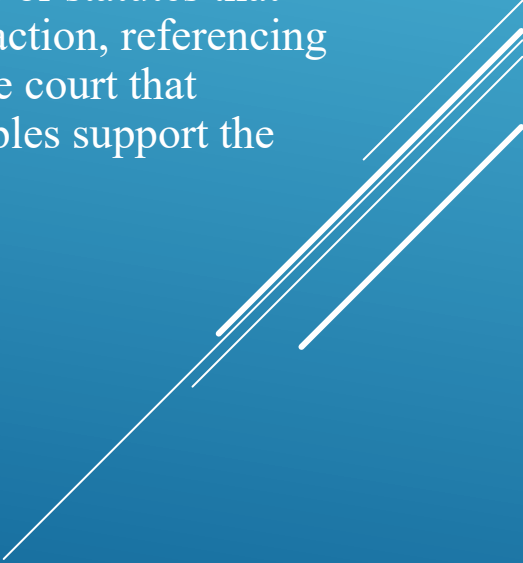
## CLAIMS FOR RELIEF/CAUSES OF ACTION

- Breaks down the legal basis for the lawsuit.



- Includes elements of claims like duty, breach, causation, and damages.

# LEGAL CAUSES OF ACTION

- ▶ This portion explains the legal theories the plaintiff believes entitle them to relief. For instance, negligence might state the elements—duty, breach, causation, and damages—and show how each applies to the defendant's conduct. A breach-of-contract claim would outline the contract's formation, the breach, and the resulting financial or personal harm. Paralegals often help attorneys research cases or statutes that bolster these causes of action, referencing them briefly to show the court that established legal principles support the plaintiff's claims.
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## What is a “Count” in a Personal Injury Lawsuit?

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In Florida (and in most states), a lawsuit is often made up of **separate “Counts.”**

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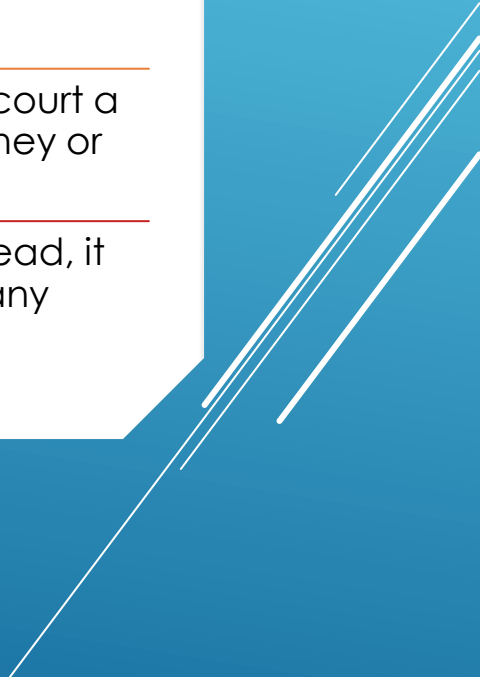
Think of a lawsuit as a **book**.

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Each **Count** is like a **chapter** in that book, and each chapter tells the court a different *legal reason* why the plaintiff (injured person) should win money or another remedy.

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A Count doesn’t mean “how many times” something happened. Instead, it means **a specific legal claim**. One lawsuit can have one Count or many Counts.



## Examples in a Florida Personal Injury Case

### 1. Negligence (Count I)

1. The plaintiff says: “The defendant had a duty to drive safely, but they were texting and caused the crash. Their negligence caused my injuries.”
2. This is when the defendant broke a law meant to keep people safe.
3. Example: The driver ran a red light (violating Florida traffic law) and hit the plaintiff. That law violation itself is used as proof of negligence.

### 2. Vicarious Liability (Count III)

1. Example: If the driver was working for a delivery company, the plaintiff may add a Count against the company. “Because the driver was on the job, the employer should also be responsible.”

### 3. Negligent Hiring/Training (Count IV)

1. Example: The delivery company knew the driver had multiple DUIs but hired them anyway. The plaintiff can add a Count saying the company was negligent in hiring.

### 4. Loss of Consortium (Count V)

1. Example: The injured person’s spouse can add a Count claiming damages for the loss of companionship, help, and intimacy due to the injury.

### Each Count = a separate path to recovery.

- If the jury or judge doesn’t agree with one Count, they may still agree with another.
- Lawyers often include multiple Counts to cover every legal theory that fits the facts.



- Details the harm suffered by the plaintiff(s).



- Specifies the compensation being sought.


# DAMAGES



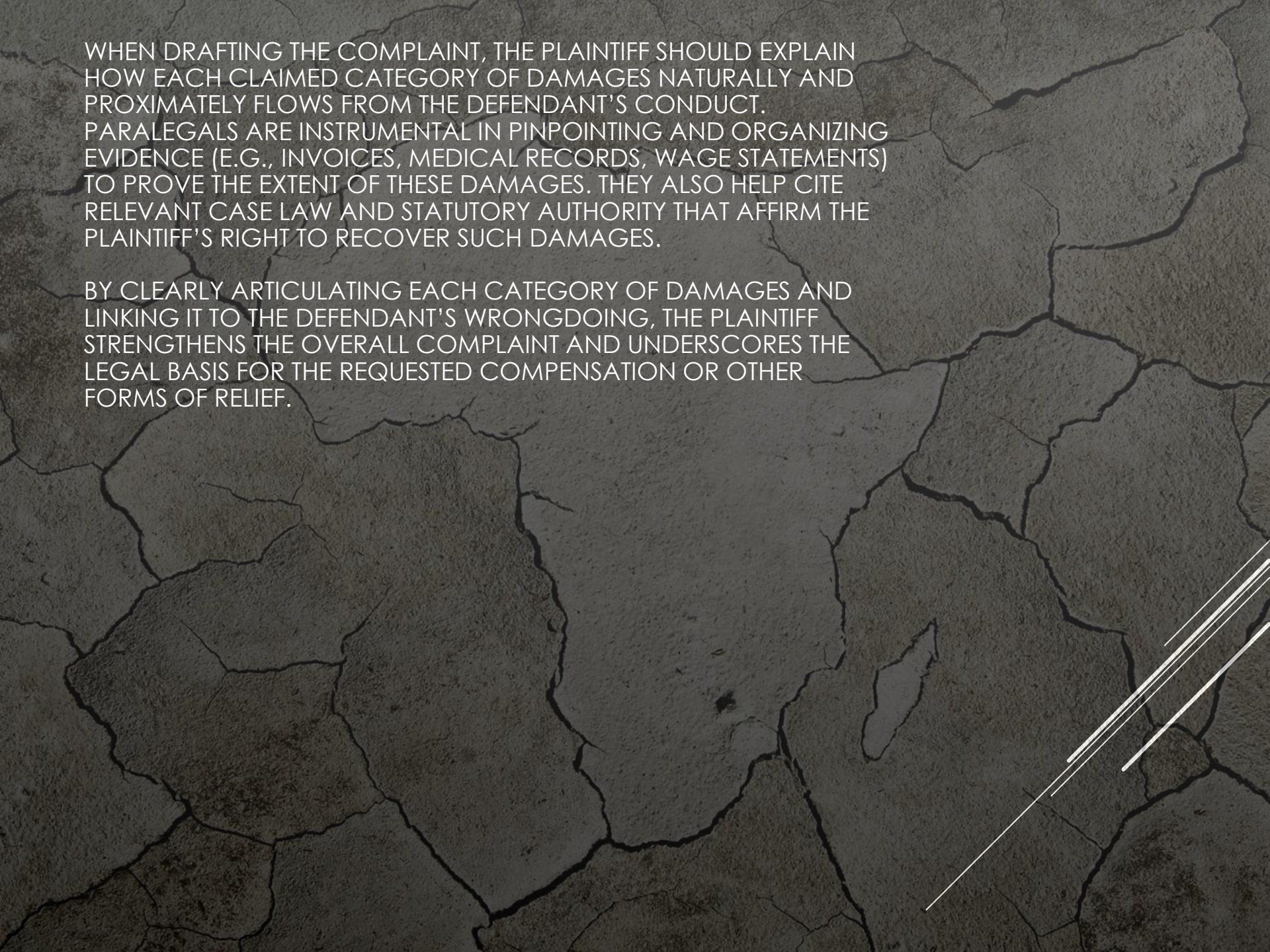
A vertical strip on the left side of the image shows a close-up of a weathered, cracked concrete wall. The surface is uneven, with various shades of gray and brown, and several prominent, irregular cracks running across it.

## **DAMAGES**

IN ADDITION TO ESTABLISHING THE LEGAL CAUSES OF ACTION, THE COMPLAINT MUST DETAIL THE HARM THE PLAINTIFF SUFFERED AND THE RELIEF SOUGHT. DEPENDING ON THE TYPE OF CLAIM—WHETHER NEGLIGENCE, BREACH OF CONTRACT, OR ANOTHER CAUSE OF ACTION—THE PLAINTIFF MAY REQUEST VARIOUS FORMS OF DAMAGES.

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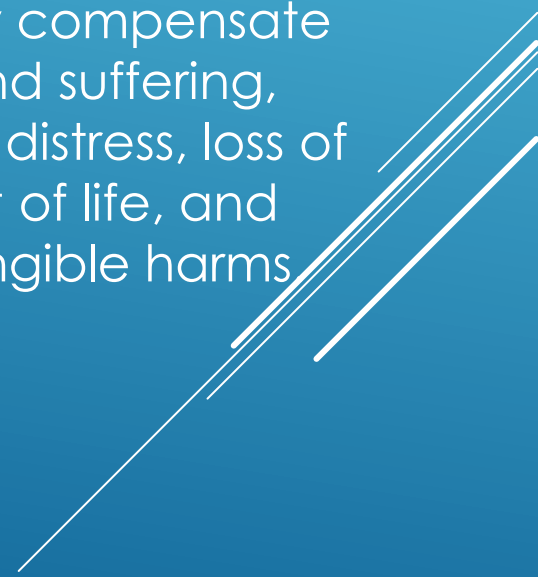


The background is a dark, textured surface with a network of irregular, light-colored cracks. In the bottom right corner, there are several parallel white diagonal lines.

WHEN DRAFTING THE COMPLAINT, THE PLAINTIFF SHOULD EXPLAIN HOW EACH CLAIMED CATEGORY OF DAMAGES NATURALLY AND PROXIMATELY FLOWS FROM THE DEFENDANT'S CONDUCT. PARALEGALS ARE INSTRUMENTAL IN PINPOINTING AND ORGANIZING EVIDENCE (E.G., INVOICES, MEDICAL RECORDS, WAGE STATEMENTS) TO PROVE THE EXTENT OF THESE DAMAGES. THEY ALSO HELP CITE RELEVANT CASE LAW AND STATUTORY AUTHORITY THAT AFFIRM THE PLAINTIFF'S RIGHT TO RECOVER SUCH DAMAGES.

BY CLEARLY ARTICULATING EACH CATEGORY OF DAMAGES AND LINKING IT TO THE DEFENDANT'S WRONGDOING, THE PLAINTIFF STRENGTHENS THE OVERALL COMPLAINT AND UNDERSCORES THE LEGAL BASIS FOR THE REQUESTED COMPENSATION OR OTHER FORMS OF RELIEF.

# COMPENSATORY DAMAGES

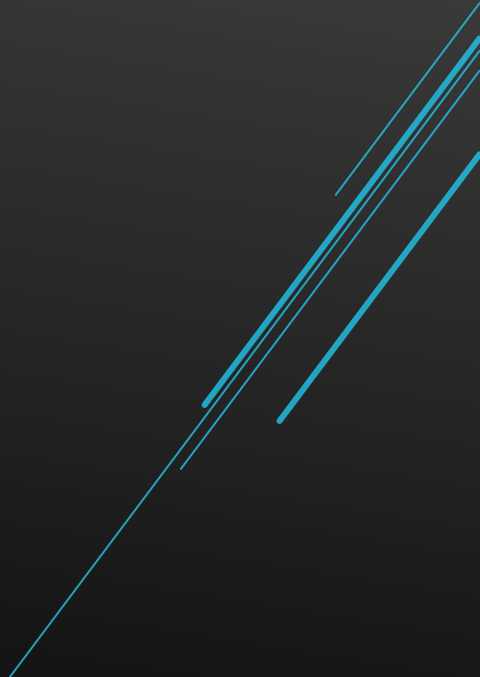
- ▶ Economic Damages: These may include out-of-pocket expenses or calculable financial losses such as medical bills, repair costs, lost wages and other verifiable monetary harms that directly resulted from the defendant's conduct.
  - ▶ Non-Economic Damages: These may compensate for pain and suffering, emotional distress, loss of enjoyment of life, and other intangible harms
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## CONSEQUENTIAL (OR SPECIAL) DAMAGES

- Where applicable, the plaintiff may seek consequential or special damages that extend beyond the immediate financial loss. These damages must be shown to be a foreseeable result of the defendant's actions or breach.

# PUNITIVE (OR EXEMPLARY) DAMAGES

- In cases where the defendant's conduct was willful, malicious, or grossly negligent, the plaintiff may request punitive damages. Their purpose is to punish the defendant and deter similar conduct, rather than simply compensate the plaintiff.
- 



- Some causes of action allow for specific statutory damages if the defendant's conduct falls under particular state or federal statutes. Paralegals and attorneys often research these statutes to determine whether the plaintiff is entitled to a fixed or enhanced recovery as mandated by law.

## STATUTORY DAMAGES

- Depending on the nature of the dispute, a plaintiff may also seek non-monetary relief, such as an injunction to stop harmful behavior, specific performance of a contract, or declaratory relief clarifying the rights and obligations of the parties.

## EQUITABLE RELIEF



# PRAYER FOR RELIEF

- ▶ • Specifies the remedies or relief requested.
- ▶ • Examples: monetary damages, injunctions, specific performance.





- After listing the causes of action, the Complaint concludes with a request for specific remedies. The plaintiff might demand monetary damages to recover medical bills and lost wages, or they could seek an injunction to stop the defendant from continuing a harmful activity. In contract disputes, the plaintiff might ask the court to order the defendant to honor the deal (specific performance). Commonly, the Complaint ends with language requesting “any additional relief the court deems just and proper,” which gives the court some flexibility if it identifies another appropriate remedy down the line.

## PRAYER FOR RELIEF

# SIGNATURES AND VERIFICATION

- ▶ • Includes the attorney's signature.
- ▶ • May include a verification statement by the plaintiff.



# ATTACHMENTS OR EXHIBITS

- ▶ • Any supporting documents referred to in the complaint.
- ▶ • Examples: contracts, emails, photos, insurance policies.



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

\_\_\_\_\_,

**Plaintiff,**

**vs.**

**Case**

**No.:**


\_\_\_\_\_,

**Defendant.**

\_\_\_\_\_ /

## **COMPLAINT AND DEMAND FOR JURY TRIAL**

**COMES NOW** the Plaintiff, \_\_\_\_\_, by and  
through undersigned counsel, and sues the Defendant, \_\_\_\_\_,  
and alleges as follows:



## **JURISDICTION AND VENUE**

1. This is an action for damages which exceed \_\_\_\_\_ Thousand (\$\_\_\_\_,000.00) Dollars, exclusive of costs and interest.
2. Venue lies within Hillsborough County, pursuant to Section 47.011, *Florida Statutes*, as the incident giving rise to this cause of action occurred in this Judicial Circuit.

## **PARTIES AND FACTS COMMON TO ALL ALLEGATIONS**

3. At all times material hereto, Plaintiff, \_\_\_\_\_ (hereinafter referred to “Plaintiff” or “\_\_\_\_\_”), was a resident of Hillsborough County, Florida.
4. At all times material hereto, Defendant, \_\_\_\_\_ (hereinafter referred to “Defendant” or “\_\_\_\_\_”) was and is a governmental entity of the State of Florida, licensed and authorized to and doing business in Hillsborough County, Florida.
5. On or about October \_\_\_\_\_, 20\_\_\_\_\_, Plaintiff was operating a 2022 Dodge Ram Rebel traveling southbound on \_\_\_\_\_ Avenue in Hillsborough County, Florida.
6. On or about October \_\_\_\_\_, 20\_\_\_\_\_, C. \_\_\_\_\_ was operating a 2022 Chevrolet Traverse owned by Defendant, with its express and/or implied permission, traveling southbound on Nebraska Avenue in Hillsborough County, Florida, directly behind Plaintiff.

7. On or about October \_\_\_\_, 20\_\_\_\_, the vehicle ahead of Plaintiff came to a stop in the roadway causing Plaintiff to have to stop behind that vehicle, which he was able to do; however, C. \_\_\_\_\_ failed to stop the 2022 Chevrolet Traverse and violently struck the rear of Plaintiff's vehicle.

8. As a result of the crash, Plaintiff suffered serious and permanent injuries, as well as property damage to his 2022 Dodge Ram Rebel.

9. Pursuant to Fla. Stat. 768.28, Plaintiff sent the required Notice of Claim letter (attached as Exhibit A) to Defendant, \_\_\_\_\_, and the Department of Financial Services on February \_\_\_\_, 20\_\_\_\_, and has complied with the conditions precedent to bringing this action.



## **COUNT I: NEGLIGENCE AGAINST VOLUSIA COUNTY**

10. Plaintiff hereby adopts and incorporates herein paragraphs 1-9.

11. At all times material hereto, Defendant, was the registered owner of the vehicle driven by C. \_\_\_\_\_ in the regular course and scope of its business and for the benefit of Defendant.

12. C. Ratliff was acting in the course and scope of her employment and as an agent and servant of Defendant, at the time of the collision. Defendant is liable for Ms. Ratliff's negligent acts and/or omissions under the doctrine of respondent superior and/or agency principles and/or the dangerous instrumentality doctrine.

13. Defendant, is responsible for the above-described negligent and careless acts, omissions, and failures of Ms. \_\_\_\_\_, as she was engaged in the business of Defendant, was acting within the course and scope of her employment with Defendant, and was acting with the knowledge, permission, and consent of Defendant, in the operation of the 2022 Chevrolet Traverse.

14. As a direct and proximate result of the negligence of Defendant, Plaintiff, sustained serious and permanent injury, and has in the past and will in the future suffer the following damages:

- a. Bodily injury;
- b. Great physical pain and suffering;
- c. Disability and inability and loss of capacity to lead and enjoy a normal life;
- d. Inconvenience;
- e. Physical impairment;
- f. Disfigurement and scarring;
- g. Mental anguish;
- h. Loss past wages and loss of earning capacity;
- i. Permanent injury within a reasonable degree of medical probability;
- j. Medical and related expenses, past and future; and
- k. Property damage.

**WHEREFORE**, Plaintiff, \_\_\_\_\_, demands a trial by jury and judgment against Defendant, \_\_\_\_\_, for an amount within the jurisdictional limits of this Court and in excess of Fifty Thousand (\$50,000.00) Dollars plus costs, and for such other relief to which the Plaintiff may be justly entitled.

Dated: September \_\_\_\_, 2024



Respectfully submitted,

**LAW FIRM NAME**

/s/ \_\_\_\_\_, ESQ.

Florida Bar No.:

Primary:

Secondary:

Address:

Telephone: (727)

Facsimile: (727)

*Attorneys for Plaintiff*

## What's New in Rule 1.280 (Initial Disclosures) January 2025

### 1. Mandatory Initial Disclosures Within 60 Days

- For the first time, Florida now requires parties to provide initial disclosures—without waiting for a discovery request—within 60 days after service of the complaint (unless the court orders a different timeline)
- Florida Courts+1217th Judicial Circuit Court+12JD Supra+12.
- These disclosures must include:
  - Contact info (name, address, phone, email) for individuals likely to have discoverable information relevant to the claims or defenses.
  - Documents or descriptions of documents the party may use to support its case.
  - Computation of damages by category, along with supporting documentation.
  - Any insurance policies or agreements that may cover judgment or indemnify payments
    - 17th Judicial Circuit Court+3Zelle Law+3Boies Schiller Flexner LLP+3Tavil Law+1.

## 2. Duty to Supplement or Correct Disclosures

- If a party later learns that their initial disclosures (or responses to interrogatories, requests for production/admission) were incomplete or incorrect, they must supplement or correct them in a timely manner, unless the other party already knows the updated info in the discovery process or in writing
- Galloway Law Firm+1117th Judicial Circuit Court+11Expert Institute+11.



### **3. Cannot Proceed with Discovery Until Disclosures Are Served**

- **As of June 19, 2025, the rule was clarified: a party may not initiate any discovery (written, depositions, etc.) until their initial disclosures have been served, except by stipulation or court order**

**Boies Schiller Flexner LLP+3Zelle**

**Law+3Butler Weihmuller Katz Craig LLP+3.**

## Why It Matters (and What's Behind It)

- These changes mirror federal practice, particularly Federal Rule of Civil Procedure 26(a), shifting litigation in Florida toward greater structure and efficiency
  - Butler Weihmuller Katz Craig LLP+10RumbergerKirk+10Zelle Law+10.
- The overall goal is to reduce delays, discourage “gotcha” tactics, and promote more timely, transparent case progressionGalloway Law Firm.
- These amendments are part of a broader procedural overhaul, including:
  - Case management tracks (streamlined, general, complex),
  - Strict deadlines and enforcement mechanisms,
  - Conferral requirements before motions,Discouraged trial continuances

# AT A GLANCE: THE NEW DISCLOSUR E RULE

Feature	Requirement
Initial Disclosures	Mandatory within 60 days of service of complaint
Contents	Witnesses, documents, damages, insurance policies
Supplements Required	Required promptly when new material information emerges
Discovery Timing	Can't begin until these disclosures are served
Effective Dates	Rule 1.280 changes – Jan 1, 2025; timing clarification – June 19, 2025

IN THE CIRCUIT COURT OF THE \_\_\_\_ JUDICIAL  
CIRCUIT  
IN AND FOR \_\_\_\_\_ COUNTY, FLORIDA

Case No.: \_\_\_\_\_

Division: \_\_\_\_\_

PLAINTIFF NAME, Plaintiff,

v.

DEFENDANT NAME, Defendant.

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## **1. Individuals Likely to Have Discoverable Information**

List names, contact information, and a short description of knowledge for each witness:

Name - \_\_\_\_\_

Name - \_\_\_\_\_

## **2. Documents and Tangible Evidence**

Identify categories of documents you may use to support your claims/defenses:


- Medical records / bills (if Plaintiff)
- Incident reports / manuals (if Defense)
- Photographs / videos
- Insurance policies
- Other: \_\_\_\_\_

### 3. Computation of Damages

For Plaintiff: Itemize damages by category with supporting documentation.


- Past medical expenses: \_\_\_\_\_
- Future medical expenses: \_\_\_\_\_
- Lost wages: \_\_\_\_\_
- Pain and suffering: \_\_\_\_\_

For Defense: State 'Defendant does not seek damages but reserves right to taxable costs and attorney's fees.'

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#### **4. Insurance Agreements**

Identify any insurance agreements that may cover part/all of judgment:

- Carrier: \_\_\_\_\_
  - Policy Number: \_\_\_\_\_
  - Limits: \_\_\_\_\_
  - Effective Dates: \_\_\_\_\_
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## **5. Duty to Supplement**

Acknowledgment of continuing duty under Rule 1.280 to supplement or correct disclosures in a timely manner.



## Signature Block

DATED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Respectfully submitted,

\_\_\_\_\_  
Attorney Name, Esq.

Florida Bar No.: \_\_\_\_\_

Firm Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Attorney for [Plaintiff/Defendant]

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# PLAINTIFFS DISCLOSURE

## Sample Initial Disclosure

*(Florida Rule of Civil Procedure 1.280)*

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA**

**Case No.: 2025-CA-000123**

**Division: Civil**

**JOHN DOE,**

Plaintiff,

v.

**XYZ CORPORATION,**

Defendant.

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## PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Florida Rule of Civil Procedure 1.280, Plaintiff John Doe, through undersigned counsel, makes the following initial disclosures:

### 1. Individuals Likely to Have Discoverable Information

The following individuals may have discoverable information that Plaintiff may use to support claims or defenses:

- **John Doe** (Plaintiff) – 123 Main Street, Largo, FL 33770; (727) 555-1234; knowledge of incident, damages, and medical treatment.
- **Jane Smith, M.D.** – Largo Medical Center, 201 Clearwater-Largo Rd., Largo, FL; treating physician for injuries sustained.
- **Mark Johnson** – Eyewitness to the accident, contact information unknown at present (last known: Clearwater, FL).
- **XYZ Corporation Representative** – Address through Defendant's counsel; knowledge of corporate policies and practices relevant to the incident.

## 2. Documents and Tangible Evidence

Plaintiff may use the following documents and records to support claims or defenses:

- Medical records and bills from Largo Medical Center (2019–2024).
- Photographs of accident scene and Plaintiff's injuries.
- Insurance policy declarations page for coverage applicable to the incident.
- Police report from Clearwater Police Department, Case #2024-4587.

Copies of non-privileged documents within Plaintiff's possession will be produced.


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### 3. Computation of Damages

Plaintiff seeks the following categories of damages:

- **Medical Expenses (past):** Approx. \$38,000 (records attached).
- **Medical Expenses (future):** Estimated \$20,000 (subject to expert testimony).
- **Lost Wages:** Approx. \$12,000 from missed work.
- **Pain and Suffering:** To be determined by jury.

Supporting documentation is available and will be supplemented as additional information is received.



#### **4. Insurance Agreements**

Plaintiff is not aware of any insurance agreements under which an insurer may be liable to satisfy part or all of a judgment.

#### **5. Duty to Supplement**

Plaintiff reserves the right and acknowledges the duty to supplement or correct these disclosures in accordance with Rule 1.280.

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**DATED this 18th day of August, 2025.**

Respectfully submitted,

**/s/ Jane Attorney**

Jane Attorney, Esq.

Florida Bar No. 123456

Law Offices of Jane Attorney, P.A.

456 Justice Blvd., Clearwater, FL 33760

Tel: (727) 555-9876

Attorney for Plaintiff

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# Florida Initial Disclosure Checklist

	Plaintiff's Checklist	Defense's Checklist
1. Individuals Likely to Have Discoverable Information	<ul style="list-style-type: none"><li>- Plaintiff(s)</li><li>- Treating physicians</li><li>- Eyewitnesses</li><li>- Expert witnesses (if known)</li><li>- Defendant reps/employees</li></ul>	<ul style="list-style-type: none"><li>- Defendant reps/employees</li><li>- Eyewitnesses</li><li>- Plaintiff(s)</li><li>- Defense experts (e.g., IME doctors)</li><li>- Corporate rep (Rule 1.310(b)(6))</li></ul>
2. Documents / Evidence	<ul style="list-style-type: none"><li>- Medical records &amp; bills</li><li>- Photographs (scene/injuries)</li><li>- Police/incident reports</li><li>- Insurance policies (if applicable)</li><li>- Correspondence relevant to claim</li></ul>	<ul style="list-style-type: none"><li>- Incident reports</li><li>- Surveillance/security video</li><li>- Safety/training manuals</li><li>- Photographs of premises/equipment</li><li>- Insurance policies (with declarations)</li></ul>
3. Damages	<ul style="list-style-type: none"><li>- Itemized categories:<ul style="list-style-type: none"><li>• Past medical</li><li>• Future medical</li><li>• Lost wages</li><li>• Pain &amp; suffering</li></ul></li><li>- Attach supporting docs</li></ul>	<ul style="list-style-type: none"><li>- Not seeking damages (unless counterclaim)</li><li>- Reserve right to seek taxable costs &amp; attorneys' fees</li></ul>
4. Insurance Agreements	<ul style="list-style-type: none"><li>- List any health or auto policies covering damages (if applicable)</li><li>- Often: "None known"</li></ul>	<ul style="list-style-type: none"><li>- Must disclose liability insurer(s)</li><li>- Provide policy details (carrier, number, limits, effective dates)</li><li>- Attach declarations page</li></ul>



<b>5. Duty to Supplement</b>	<ul style="list-style-type: none"> <li>- Acknowledge ongoing duty to supplement as new info is discovered</li> </ul>	<ul style="list-style-type: none"> <li>- Same duty — confirm updates will be provided when info changes</li> </ul>
<b>6. Timing</b>	<ul style="list-style-type: none"> <li>- Serve within 60 days of complaint being served</li> <li>- No discovery allowed until served</li> </ul>	<ul style="list-style-type: none"> <li>- Same requirement — must serve before initiating discovery</li> </ul>
<b>7. Tone / Strategy</b>	<ul style="list-style-type: none"> <li>- Show strength of case (specific damages, medical proof)</li> <li>- Avoid over-disclosing too early if still gathering records</li> </ul>	<ul style="list-style-type: none"> <li>- Be transparent but cautious</li> <li>- Give enough detail to comply without helping opposing counsel too much early on</li> </ul>

## Key Practice Tips

- **Don't Delay Discovery:** Neither side can start discovery until disclosures are filed. This makes timeliness critical.
- **Think Federal:** The rule mirrors **Fed. R. Civ. P. 26(a)**, so federal templates/checklists are good practice guides.
- **Supplement Early & Often:** Judges will enforce supplementation requirements—better to update than risk sanctions.
- **Be Strategic:** Plaintiffs should highlight damages clearly; defense should be transparent but avoid “volunteering” unnecessary detail.