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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

, an individual;

Plaintiff,

vs.

; Does 1 TO 10, Inclusive,

Defendants.

Case No. 23STCV11854

**PLAINTIFF'S RESPONSES TO REQUEST FOR
IDENTIFICATION AND PRODUCTION OF
DOCUMENTS**

PROPOUNDING PARTY: Defendant,

RESPONDING PARTY: Plaintiff,

SET NUMBER: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLAINTIFF, , (hereinafter “Responding Party”) makes the following answers and objections to
the REQUEST FOR IDENTIFICATION AND PRODUCTION OF DOCUMENTS , Set One.

PRELIMINARY STATEMENT

Plaintiff’s investigation and discovery of the facts relating to this case, and preparation for trial,
are continuing and not complete. All of the responses contained herein are presently available to and
specifically known to this Plaintiff and disclose only those contentions which presently occur to such
Plaintiff. This Plaintiff will, during the course of this litigation, pursue extensive formal discovery, as
well as extensive investigation and informal discovery on her own. Therefore, without suggesting or

1 implying any interest to respond less than fully to the Demand for Production, this Plaintiff must point
2 out that her responses are of necessity of a somewhat preliminary nature and that the full factual basis
3 concerning this matter is yet to be developed with complete precision. However, this Plaintiff assumes
4 no obligation to voluntarily supplement or amend these responses to reflect any facts, contentions,
5 witnesses, and evidence which may be discovered following the serving of theses response. The
6 response contained herein are made in a good faith effort to supply as much factual information and as
7 much specification of legal contentions as is presently known.

8 **DEMAND NO. 1:**

9 All DOCUMENTS relating to the medical treatment received by YOU arising from this
10 INCIDENT, including but not limited to, any and all medical reports or records, diagnostic images,
11 correspondences from treating physicians, medical billings, or status and/or prognosis reports.

12 **RESPONSE TO DEMAND:**

13 Objection. Overbroad ddd. Calls for an expert opinion from a lay witness. Calls for premature
14 disclosure of expert witness opinion in violation of California Code of Civil Procedure sections
15 2034.210, 2034.220, and 2034.270. Intended to harass and annoy. Notwithstanding the foregoing
16 objections and subject thereto, Responding Party responds as follows:
17 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

18 **DEMAND NO. 2:**

19 All DOCUMENTS relating to relating to any prior or subsequent incidents in which YOU
20 suffered injuries to the same parts of YOUR body which YOU claim were injured in this INCIDENT,
21 including but not limited to, any and all medical reports, correspondence from treating physicians,
22 medical billings, prognosis and/or status reports. Case No. 23STCV11854

23 **RESPONSE TO DEMAND:**

24 Objection. Calls for an expert opinion from a lay witness. Notwithstanding the foregoing
25 objections and subject thereto, Responding Party responds as follows:
26 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

27 **DEMAND NO. 3:**

1 All DOCUMENTS pertaining to YOUR claim for loss of earnings or loss of earning capacity
2 from the INCIDENT, including but not limited to, wage/income statements, verifications or losses, pay
3 stubs, withholding statements, tax returns, ledgers, income profits, commissions or salaries, or other
4 records or books.

5 **RESPONSE TO DEMAND:**

6 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

7 **DEMAND NO. 4:**

8 Any and all written statements taken or received by you from any witness to this INCIDENT or
9 from any party to this incident.

10 **RESPONSE TO DEMAND:**

11 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

12 **DEMAND NO. 5:**

13 Any and all property repair estimates, invoices or cancelled checks of any property damage
14 claimed as a result of the INCIDENT which is the subject of this action.

15 **RESPONSE TO DEMAND:**

16 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

17 **DEMAND NO. 6:**

18 The declaration page reflecting automobile insurance which covered you at the time of the
19 subject INCIDENT.

20 **RESPONSE TO DEMAND:**

21 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

22 **DEMAND NO. 7:**

23 All photographs, video tapes, recordings, diagrams, representations or reproductions of any
24 location or accident scene involved in the INCIDENT which is the subject of this action.

25 **RESPONSE TO DEMAND:**

26 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

27 **DEMAND NO. 8:**

1 All photographs, video tapes, recordings, diagrams, representations or reproductions of any object
2 or property involved in the INCIDENT which is the subject of this action.

3 **RESPONSE TO DEMAND:**

4 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

5 **DEMAND NO. 9:**

6 All photographs, video tapes, recordings, diagrams, representations or reproductions of any party
7 involved in the INCIDENT which is the subject of this action.

8 **RESPONSE TO DEMAND:**

9 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

10 **DEMAND NO. 10:**

11 All photographs, video tapes, recordings, diagrams, representations or reproductions of any
12 experts involved in this litigation.

13 **RESPONSE TO DEMAND:**

14 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

15 **DEMAND NO. 11:**

16 All DOCUMENTS relating to any and all investigative reports of any party involved in the
17 INCIDENT, including any and all sub rosa, surveillance, social media investigation or other
18 investigative reports of any party to this action.

19 **RESPONSE TO DEMAND:**

20 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

21 **DEMAND NO. 12:**

22 All DOCUMENTS relating to any and all investigative reports of any experts involved in this
23 litigation, including any and all sub rosa, surveillance or other investigative reports.

24 **RESPONSE TO DEMAND:**

25 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

26 **DEMAND NO. 13:**

27 All statements obtained from any of the defendants, their managing agents, supervisors or
28 employees regarding the incident, which is the subject of this action. Case No. 23STCV11854

1 **RESPONSE TO DEMAND:**

2 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

3 **DEMAND NO. 14:**

4 All reports of any governmental agency which reported or investigated the incident which forms
5 a basis of your action, including, but not limited to, city police reports, California Highway Patrol
6 reports, etc.

7 **RESPONSE TO DEMAND:**

8 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

9 **DEMAND NO. 15:**

10 Any journals, diaries, ledgers in which plaintiff made notes and/or recorded any writings
11 concerning his or her injuries suffered in connection with the subject incident.

12 **RESPONSE TO DEMAND:**

13 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

14 **DEMAND NO. 16:**

15 Any and all data, information, statistics, recordings, or readings from personal health monitoring
16 devices taken within the last 5 years. "Personal health monitoring devices" shall include, but is not
17 limited to, devices such as Fitbit, Apple Watch, iPhone, Samsung Galaxy, any smart phone, fitness
18 tracker, wearable wrist pedometers, medical alert devices, sleep number devices, wearing pulse
19 oximeters, or any devices that transmits personal health information or data.

20 **RESPONSE TO DEMAND:**

21 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

22 **DEMAND NO. 17:**

23 Any and all documents that support YOUR contention that propounding party was negligent, as
24 alleged in your action.

25 **RESPONSE TO DEMAND:**

26 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

27 **DEMAND NO. 18:**

1 Any photos YOU intend to show at the time of trial related to YOUR injuries and/or claim for
2 damages.

3 **RESPONSE TO DEMAND:**

4 Responding Party will comply with this demand. Please see “” produced concurrently herewith.

5 **DEMAND NO. 19:**

6 All COMMUNICATIONS between YOU and the propounding party relating to the subject
7 INCIDENT.

8 **RESPONSE TO DEMAND:**

9 Responding Party will comply with this demand. Please see “” produced concurrently herewith.

10 **DEMAND NO. 20:**

11 All COMMUNICATIONS between YOU and any third-party relating to YOUR injuries alleged
12 from the subject INCIDENT, including but not limited to, communications between YOU and YOUR
13 spouse, partner, family, employer, friend, or other third-party.

14 **RESPONSE TO DEMAND:**

15 Responding Party will comply with this demand. Please see “” produced concurrently herewith.

16 Dated: COHEN LAW PARTNERS

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18 By: _____
19 Darren A. Reid
20 Attorneys for Plaintiff
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