<<COURT\_NAME>>

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| <<PROVIDER\_SUITNAME>>,  a/a/o <<INJUREDPARTY\_NAME>>  Plaintiff,  vs.  <<INSURANCECOMPANY\_SUITNAME>>  Defendant  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/ | Case No. <<INDEXORAAA\_NUMBER>> |

**CERTIFICATE OF SERVING**

**PLAINTIFF’S EXPERT REQUEST FOR PRODUCTION**

I HEREBY CERTIFY that on February 19, 2022 a true and correct copy of the foregoing was served upon the Defendant via the Florida E-file Portal.

The Florida Insurance Law Group, LLC

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262

Logo, company name

Description automatically generated

Leo Manon III, Esq.

Fla. Bar No. 115757

[Pleadings@flinslaw.com](mailto:Pleadings@flinslaw.com)

<<COURT\_NAME>>

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| --- | --- |
| <<PROVIDER\_SUITNAME>>,  a/a/o <<INJUREDPARTY\_NAME>>  Plaintiff,  vs.  <<INSURANCECOMPANY\_SUITNAME>>  Defendant  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/ | Case No. <<INDEXORAAA\_NUMBER>> |

**PLAINTIFF’S EXPERT REQUEST FOR PRODUCTION**

**COMES NOW**, Plaintiff, <<PROVIDER\_SUITNAME>>, by and through the undersigned counsel, hereby requests Defendant, <<INSURANCECOMPANY\_SUITNAME>>, to produce the following delineated documents to Plaintiff’s undersigned counsel within thirty (30) days from the date of service of this Request as provided in the Florida Rules of Civil Procedure.

**INSTRUCTIONS**

A. In producing documents requested herein, please produce documents in full, without abridgement, abbreviation or expurgation of any part.

B. With respect to all documents requested, please segregate such documents in accordance with the numbered and lettered paragraphs and subparagraphs herein.

C. If a document is called for under more than one request, it should be produced in response to the first request and a notice appended to it stating the other request(s) to which it is claimed that such document is responsive.

D. If copies or drafts exist of documents, the production of which has been requested herein, please produce and submit for inspection and copying each and every copy and draft which differs in any way from the original document or from any other copy or draft.

E. If a document is not produced on the basis of a claim or privilege or statutory authority, please identify the type of document and reason for not producing same by stating with respect to such document:

(a) its author(s),

(b) addressee(s),

(c) date,

(d) type of document,

(e) subject matter,

(f) number of pages,

(g) number of attachments or appendices,

(i) all persons to whom shown or explained,

(j) the present custodian, and

(k) the factual or legal basis for the claimed privilege or specific statutory authority which provides the claimed basis for non-production.

F. If any document(s) requested herein have been destroyed, or otherwise disposed of, please identify such document by: author(s), addressee(s), date, type of document, subject matter, number of pages, number of attachments or appendices, indicated or blind copies, all person(s) to whom distributed, shown or explained, date of destruction or other disposition, reason for destruction or other disposition, person(s) authorizing destruction or other disposition, person(s) destroying or otherwise disposing of document, and if not destroyed, the person(s) in possession of the document otherwise disposed of.

G. In compiling documents requested herein, you are required by Florida Rules of Civil Procedure to exercise due diligence in attempting to secure documents requested herein that are not only in Your custody and possession, but also documents that are within Your control. A document is deemed to be in Your “control” if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof.

H. If any documents requested herein have been placed beyond Your control (a document is deemed to be in Your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof), identify the person(s) or entities with possession or custody, and why.

I. If any documents requested herein are no longer, in Your possession or custody, state what disposition was made of it, by whom, and the date or dates or approximate date or dates on which such disposition was made, and why.

**DEFINITIONS**

I. "Document(s)" or "written communication(s)" is used in the broad and liberal sense and means written, typed, printed, recorded or graphic matter, however produced or reproduced, of any kind and description, and whether an original, master, duplicate or copy, including, but not limited to, accounts, advertisements, agreements, appointment books, bank checks, bills, books, books of account, bulletins, cablegrams, cancelled checks, cashier's checks, catalogs, charts, check stubs, communications, computer printouts, contracts, corporate records, correspondence, desk calendars, diaries, diary entries, drawings, e-mail, graphic records, guarantees, inter-office communications, intra-office communications, invoices, ledger books, letters, logs, mailgrams, magazines, manuals, marginal notes (appearing on any document), memoranda, minutes (e.g., board of directors, committee), models, motion pictures, notations, notebooks, notes, offers, pamphlets, papers, photographs, physical objects, plans, printed matter, projections, prospectuses, publications, receipts, reports, returns, sketches, sound recordings (including, by way of example, any type of personal or telephone conversation, meeting or conference) specifications, statements, statistics, studies, summaries, surveys, tape recordings, tapes, telegrams, tele-faxes, teletypes, transcriptions (including, by way of example, any type of personal or telephone conversation, meeting or conference), transcripts, video tapes, vouchers, warranties, working papers, worksheets; and all amendments, changes, drafts, modifications of any of the foregoing, of which you have knowledge or which are now or were formerly in Your actual or constructive possession, custody or control. The responses concerning documents requested shall include information regarding whether such document is an original, a duplicate, or a copy thereof.

II. When used in this request, the term "electronic data" means computerized files and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, or other means. Electronic data includes, but is not limited to, output resulting from the use of any software program, including word processing programs such as Microsoft Word, WordPerfect, Notepad, Wordpad, PowerPoint, MS Excel, MS Access, Adobe Acrobat, Outlook, spreadsheets, database files (including descriptive information regarding tables, fields and values), charts, graphs and outlines, electronic mail, photographs, pictures, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether said electronic data consists in an active file, deleted file or file fragment. Electronic data includes any and all items stored on computer memories, hard-disks, floppy disks, CD-ROMs, DVDs, removable media such as Zip disks, thumb drives, digital memory cards and their equivalent, magnetic tapes of all types, on or in any other vehicle for digital data storage and/or transmittal. The term electronic data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

III. When used in this request, the term "computer" shall include, but is not limited to, microchips, personal computers, laptop computers, portable computers, notebook computers, palmtop computers (also known as personal digital assistants or PDA’s), minicomputers, mainframe computers, and all other electronic storage devices that store electronic data.

IV. "Concern," "concerning," "evidencing," "regard," "regarding," "reflecting," "relates" or "relates to" shall mean relating to, referring to, connected with, commenting on, responding to, containing, evidencing, showing, memorializing, describing, analyzing, comprising, constituting, reflecting, discussing, supporting, contradicting, refuting, embodying, identifying, pertaining, or in any way logically or factually connected with the matter discussed.

V. If an individual, "You" and "Your" shall refer to and include Your agents, attorneys, experts, investigators, representatives and all others, whether past or present, who have obtained information for or on behalf of you.

VI. If a corporation, "you" and "Your" shall refer to and include any of Your affiliates and subsidiaries, agents, associates, attorneys, directors, employees, experts, independent contractors, representatives, servants, and all others, whether past or present, who have obtained information for or on behalf of the corporation.

VII. The words "and" and "or" shall be construed conjunctively and disjunctively as necessary to make the request inclusive rather than exclusive.

VIII. "Identify," or "state the identity of":

(a) When used in reference to a natural person means to please state:

i. His/her full name;

ii. Present or last known business and residence address;

iii. His/her present or last known occupation and position;

iv. His/her present or last known employer or business affiliation;

v. His/her occupation or position at the time in question specified in the particular request.

(b) When used in reference to a "document" means to please state:

i. A description of the type of document (e.g., letter, memorandum, telegram, etc.);

ii. The identity of the person or persons who authored or prepared it;

iii. In the case of an agreement or contract, the identity of the parties' signatory;

iv. The identity of the addressee(s), if any, and the recipient(s) of the original and a copy thereof;

v. The title thereof, if any, and a description of the general nature of its subject matter;

vi. The date of the document, or, if none, the approximate date of its preparation;

vii. The manner of distribution and publication, if any;

viii. The present location or custodian of the original and each copy thereof;

ix. The identity of any persons who can identify it;

x. Whether such documents contained, enclosed, were attached to or accompanied by any other documents, and if so, state the identity thereof;

xi. If a privilege is claimed, the specific basis, therefore.

(c) In lieu of identifying a particular document when such identification is requested, a copy of such document may, at Your option, be attached to the response to these requests; provided that any specific information required pursuant to the foregoing definition which is not fully set forth on the face of such copy of a document must be separately provided in response to these requests.

IX. “Defendant’s Expert(s)” shall mean each person identified in response to Interrogatory No. 1 of Plaintiff’s Expert Interrogatories to Defendant being served simultaneously with this Request and/or in Defendant’s Expert Witness List.

**REQUESTS**

1. The most current Curriculum Vitae or resume for Defendant’s Expert(s).

2. All written reports generated by Defendant’s Expert(s).

3. Any writing which is intended to memorialize the agreement between Defendant and/or Defendant’s counsel and Defendant’s Expert(s), which may include the date the person was engaged or otherwise retained by or on behalf of the Defendant, any retainer paid to the witness, the witness’s hour rate or schedule of fees, or other such terms of the engagement.

4. All invoices, statements for services rendered, or bills for professional fees or other writings which document or otherwise memorialize the person’s fees and expenses charged to date in this civil action for Defendant’s Expert(s).

5. All documents Defendant’s Expert(s) reviewed with respect to this matter.

6. All communications between Defendant’s Expert(s) and Defendant or Defendant’s counsel regarding this matter.

7. The entire file of each of Defendant’s Expert(s).

8. Any and all materials relied upon by and of Defendant’s Expert(s) in formulating their opinions in this matter, including but not limited to, all documents, videos, pictures or other material relied upon by any of Defendant’s Expert(s) in formulating their opinions.