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401028520-001; 45573; 3F
CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

-----X
NEURO CARE CENTER, as assignee of SYDNEY
ARNOLD,

Plaintiffs,

Index No.:

-against-

COMBINED DEMANDS

PEERLESS INSURANCE COMPANY,

Defendant.

-----X

PLEASE TAKE NOTICE, that the undersigned hereby serves the following demands upon plaintiff, pursuant to CPLR Section 3120 and 3101 et seq., returnable at the offices of Robin, Schepp, Yuhas, Doman & Harris, 1133 Avenue of the Americas, 27th Floor, New York, New York 10036, on the 17th day of *OCTOBER*, 2002, at 10:00 a.m.

1. That you serve and deliver written proof of the claim setting forth full particulars of the nature and extent of the injuries, treatment and other details entering into the determination of the amount claimed under the no-fault endorsement.
2. That you serve and deliver to the undersigned copies of medical records of those physicians who have treated or examined the claimant relative to the claim. These medical reports shall include a detailed recitation of the injuries and conditions for which claims will be made, identifying and referring to those x-ray and technician's reports which are relevant and material to the injuries or damages claimed.
3. That you serve and deliver to the undersigned duly executed and acknowledge authorizations permitting the undersigned to obtain and make copies of all hospital

records and such reports as may be referred to and be identified in any of the physician's statements and/or be relevant to the claims of injuries and damages.

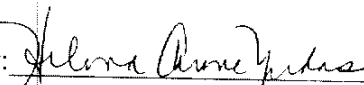
4. That you serve and deliver to the undersigned complete bills rendered for medical hospital and related services for which claims will be made.
5. That you serve and deliver copies of any correspondence relating to the payment / non-payment of said bills complained of in the complaint.
6. That you furnish a copy of written notice of claim sent to insurer.
7. That you furnish a copy of any verification requests and responses to same regarding services rendered that are complained of as not being paid.
8. That you supply proof of purchase of an index number for this action.

PLEASE TAKE FURTHER NOTICE, that the preceding demands are continuing demands and that if any of the above items or information are obtained after the date of the response to this demand, such information or items are to be furnished to the undersigned forthwith pursuant to these demands.

Dated: New York, New York
September 20, 2002

Yours, etc.,

Robin, Schepp, Yuhas, Doman & Harris
Attorneys for defendant
Peerless Insurance Company
1133 Avenue of the Americas, 27th Floor
New York, New York 10036
212 869 8620

By: 
HELENA A. YUHAS

TO: Werner, Zaroff, Slotnick, Stern & Ashkenazy
299 Broadway
New York, NY 10007
212 267 1850