

Resp. due
6/7/00

1 DAN H. DEUPREY/BAR NO. 42606
2 SOLVEIG STORE DEUPREY/BAR NO. 083000
3 WINGERT GREBING BRUBAKER & RYAN LLP
4 One America Plaza, Seventh Floor
5 600 West Broadway
6 San Diego, CA 92101-3370
7 (619) 232-8151

8 Attorney(s) for Defendant, RICHARD M. BRAUN, M.D.

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8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
9 (NORTH COUNTY JUDICIAL DISTRICT DIVISION)

10 RICK A. HOLLIFIELD, an individual,	)	CASE NO. GIN003700
11 Plaintiff(s),	)	
12 vs.	)	REQUEST FOR PRODUCTION OF
13 RICHARD M. BRAUN, M.D., KVAAS	)	DOCUMENTS AND THINGS FOR
14 CONSTRUCTION CO.; OLSEN STEEL,	)	COPYING AND/OR INSPECTION
15 INC., ARGONAUT INSURANCE CO., et	)	(FIRST SET)
16 al.,	)	
17 Defendant(s).	)	Judge: : Hon. Thomas P. Nugent
	)	Dept: : 27
	)	Telephone: 760-806-6349
	)	Complaint Filed: 3-3-2000
	)	Trial Set: None

18 **PROPOUNDING PARTY: DEFENDANT, RICHARD M. BRAUN, M.D.**

19 **RESPONDING PARTY: PLAINTIFF, RICK A. HOLLIFIELD**

20 **REQUEST FOR PRODUCTION: FIRST SET**

21 Defendant, **RICHARD M. BRAUN, M.D.**, hereby requests that Plaintiff, **RICK A.**
22 **HOLLIFIELD**, produce the items described herein below, pursuant to Section 2031 of the
23 California Code of Civil Procedure. The scheduled production date is **[DATE]**, in the law
24 offices of WINGERT, GREBING, BRUBAKER & RYAN, located at One America Plaza,
25 600 West Broadway, 7th Floor, San Diego, CA.

26 If any of the requested items are withheld on the basis of privilege or other objection,
27 you are required to respond with sufficient particularity for the purposes of a motion to
28 compel production.

1 If arrangements are made in advance of the date of the production, it is anticipated
2 that a mutually agreeable date for means of production may be scheduled. However, if
3 arrangements are not agreed to prior to the scheduled production date, the Plaintiff is
4 required to comply fully with the terms of this production request.

5 The requested documents are as follows:

6 **REQUEST FOR PRODUCTION NO. ONE:**

7 Any and all documents which support, reference, or relate to your claim of injury,
8 including but not limited to, all hospital records, such as emergency room records, admission
9 reports, doctors' notes, nurses' notes, daily records, operation reports/records, discharge
10 summaries, treating physicians' reports, records of examination and treatment, laboratory
11 tests, x-ray reports, consultations and/or reports by any other physicians, chiropractors,
12 therapists, osteopaths or other health care providers.

13 **REQUEST FOR PRODUCTION NO. TWO:**

14 Any and all documents which support, reference, or relate to your claim of medical
15 expenses, including but not limited to prescription bills, physicians' bills, hospital bills,
16 ambulance bills, therapists' bills, chiropractors' bills, osteopaths' bills and bills for medical
17 appliances.

18 **REQUEST FOR PRODUCTION NO. THREE:**

19 Any and all documents which support, reference, or relate to your claims for special
20 damages other than medical expenses .

21 **REQUEST FOR PRODUCTION NO. FOUR:**

22 Any and all Explanation of Benefits (EOB) forms or other writings as defined by
23 Evidence Code Section 250 which are evidence of collateral source payments made on behalf
24 of the Plaintiff in connection with medical expenses claimed as special damages in this
25 lawsuit. "Collateral sources" refers to payments by health insurance companies,
26 governmental entities, or other persons or entities other than Plaintiff.

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1 **REQUEST FOR PRODUCTION NO. FIVE:**

2 Any and all documents reflecting income, including but not limited to, earnings from
3 employment, sick leave, vacations, state disability, workers' compensation, social security
4 disability, and private pay or disability from 1990 through the present.

5 **REQUEST FOR PRODUCTION NO. SIX:**

6 Any and all employment and/or personnel records from 1990 through the present.

7 **REQUEST FOR PRODUCTION NO. SEVEN:**

8 Any and all employment benefit handbooks, employee statements, or other
9 documentation setting forth your fringe benefits from 1990 through the present.

10 **REQUEST FOR PRODUCTION NO. EIGHT:**

11 All diaries, journals, notes, personal calendars prepared by plaintiff which refer to
12 defendant's medical treatment of plaintiff and/or any claimed injuries which are the subject
13 of this lawsuit.

14 **REQUEST FOR PRODUCTION NO. NINE:**

15 Any and all photographs, slides, negatives and videotapes, if any, depicting plaintiff's
16 claimed injuries.

17 **REQUEST FOR PRODUCTION NO. TEN:**

18 A copy of your birth certificate.

19 **REQUEST FOR PRODUCTION NO. ELEVEN:**

20 A copy of your California Driver's License.

21 **REQUEST FOR PRODUCTION NO. TWELVE:**

22 A copy of your Social Security card.

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1 **REQUEST FOR PRODUCTION NO. THIRTEEN:**

2 Any and all O-R-I-G-I-N-A-L x-rays, films, and/or radiological studies or any kind,
3 including any and all reports relating thereto, if any, depicting plaintiff's claimed injuries.

4 Dated: May 4, 2000 WINGERT GREBING BRUBAKER & RYAN LLP

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6 By: Solveig Store Deuprey
7 DAN H. DEUPREY
8 SOLVEIG STORE DEUPREY
9 Attorneys for Defendant,
10 RICHARD M. BRAUN, M.D.
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