

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

<b>INJURED PARTY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>No: 00 L 0000</b>
	)	
<b>XXXXX XXXXX XXXX XXX</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND  
TANGIBLE THINGS TO DEFENDANT, XXXX XXXXX XXXX.**

Plaintiff, INJURED PARTY, by his attorneys, ROSENFELD INJURY LAWYERS, pursuant to Supreme Court Rule 214, requests Defendant to produce the originals of the following items no later than twenty-eight (28) days from now, together with any transcripts, memoranda or recordings purporting to reflect but not to evaluate the same, for inspection, examination and copying at 33 North Dearborn, Suite 1930, Chicago, IL 60602. Copies may be forwarded by mail in lieu of action production.

1. Produce any documents identified or in any way referred to in Response to Plaintiff’s First Set of Interrogatories to Defendant.
2. All transcribed or non-transcribed statements of any witness or party including the plaintiff. (If you claim a privilege to any statement, please state its existence and that a privilege is claimed.)
3. The statement(s) of any other witness who has, or may have, claimed knowledge of the occurrence and/or the damages resulting from the injury.
4. All photographs, slides, videotapes, motion pictures, diagrams, maps, schematics, graphs, models or other illustrative representations, pertaining to the parties, relevant to the occurrence, or involving the scene of the occurrence.
5. A copy of any accident or incident report pertaining to the occurrence on Date, Year as well as any previous or subsequent accident or injury report involving the “forklift” or “forklift operator”.
6. All reports made as a result of any inspection, examination or investigation by any person acting on behalf of the defendant as a result of the accident.

7. Any documents regarding said forklift, including but not limited to, safety manuals, instruction manuals, operator manuals, specification documents, warranty documents, manufacturer documents and maintenance documents.
8. Any and all documents regarding operation of said forklift or its operators, included but not limited to, safety programs, instruction programs, certification programs and training programs.
9. Any and all materials related to warehouse safety.
10. Any documents relating to forklift operator training.
12. All data, documents or computer records related to previous personal injury suits involving Defendant
13. Any policy of professional liability insurance, general liability insurance, personal insurance, business insurance, excess umbrella insurance, co-insurance or re-insurance which may cover defendant in any way for the occurrence referred to in the complaint, including:
  - a. carrier's name, principal place of business and telephone number;
  - b. policy number;
  - c. named insured;
  - d. additional insured(s);
  - e. limits of coverage for each person and each occurrence;
  - f. any deductible or aggregate limit for time period of this occurrence;
  - g. effective dates;
  - h. complete name, address and telephone number of broker who procured policy; and
  - i. complete name, address and telephone number of agent who procured policy.
14. All documents or other tangible items that you may use as exhibits at a hearing or trial of the action.
15. An affidavit stating whether your production is complete in accordance with this request.

Pursuant to Supreme Court Rule 214, you have a duty to seasonably supplement any prior response when subsequent documents come in to your possession or become known to you, your attorneys, investigators or other agents acting on your behalf.

ROSENFELD INJURY LAWYERS

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