

Name: _____
Date: _____

If you are sending interrogatories, please make sure you ask for items 1, 2, 3 and 7 at a minimum.

Add to Subpoena

1. Any and all documents and/or tangible materials/medical records, MRI or x-ray films and tests which have been provided to you regarding any aspect of this case from any source. **THIS INCLUDES MEDICAL RECORDS FROM OTHER HEALTH CARE PROVIDERS.**
2. Your entire file, including but not limited to, hard copies of emails sent and received, any and all reports, letters, memoranda and/or notes generated and notes, handwritten or otherwise, graphs, computer printouts, all documents completed by the claimant, copies of tests and test results completed by your office or at your direction, and all models, illustrations, photographs, exhibits or documents of any kind which you intend or contemplate using to explain, illustrate or support your testimony at the trial of this matter. **This includes computer printouts whether printed or not at the time this subpoena is served.**
3. All records of time spent by you or any member of your staff in connection with the work performed regarding this case, whether billed for or not. If none are documented then be prepared to advise the attorneys as to the amount you will charge for time spent as of date of testimony.
4. Your current curriculum vitae.
5. Publications in which the accepted principles (including basis for test administration and interpretation) and theories upon which you relied to reach your conclusion and opinions, including professional journals, text, or published position papers emanating from seminars and/or symposiums.
6. Any and all articles and published material authored by you, including the title, date and publishing company of any text, and the name and page numbers of any periodical which contains any article authored by you which you feel are relevant in this case.
7. A list of all cases in which you have testified as an expert in trial or deposition, conducted an investigation (records review), evaluation and/or prepared a report, for the last three years, specifying the names of parties, identity of counsel, dates such evaluations, records review, or testimony occurred and whether such case was a referral from plaintiff or defense
8. A list of ALL cases (not limited to three years) in which you have received referrals from the named defendant, or the law firm defending this case or the insurance company who engaged the law firm defending this case, specifying:
 - A. The names of the parties.
 - B. The amount of all monies paid to you on the case in question and from what source.
 - C. The identity of the party who retained you and whether it was plaintiff or

defense. See Allstate Insurance Co. v. Hodges, 28 FLW D1910 (Fla. 2nd DCA 2003) and Allstate Ins. Co. v. Boecher, 733 So2d 993 (Fla. 1999)

9. Printed hard copies of all email to or from any source referencing this case.
10. Hard copy of your website.
11. Any and all test administration manuals and scoring published by the publisher of the test itself used in your evaluation. The actual test booklets published by the *creators of* the tests you used i.e. if MMPI2, then most recent manual published by Pearson Assessment,, *in addition* to any other manuals you relied upon or used to determine cutoff scores for the application, interpretation and administration of any and all tests given. These do not need to be copied but should be available for you to reference should questions about scoring arise.
12. Hard copies of any and all PowerPoint presentations and/or outlines given or outlines produced for any talks or speeches.
13. All time records, diaries, and bills, prepared and rendered in connection with your investigation and evaluation of the issues involved in this lawsuit as well as all documents reflecting monies/fees paid or received. (To include members of your staff) This includes any money paid to you by any party, attorney, carrier or self insured having to do with research and or publication.
14. A complete and accurate copy of documents created for or received from, and a complete list of all courses/seminars you have attended or in which you have otherwise participated within the last three (3) years.
15. Copies of any and all templates used in the generation of any letters or reports.
16. If more than one physician signs the medical reports generated from your office on this patient, provide documentation showing the monies received by each individual physician relating to this patient.
17. Any and all items, tapes, things, papers, DVD's, CD's, that were given or sent to the doctor by any source regarding this case, including, but not limited to, surveillance materials, whether that material was returned to the individual who provided it to the doctor. If the material was returned, the undersigned requests that it be obtained in time for the deposition, so the Plaintiff's can determine all of the information that may have been provided to this witness.
18. The undersigned specifically requests the doctor NOT destroy or eliminate or remove any items requested in this document from his/her file regarding the Plaintiff.
19. All letters, documents, forms and/or reports either in electronic or paper format regarding this client. This is specifically to avoid a situation where the deponent maybe claim other documents might be in another file or in the custody of someone else in the office.
20. Copies of all bills, breakdown as to what professional charged for what

professional service in this case.

21. If affiliated with a University please bring all Notices of Outside Activities regarding this case.