

Disc.word10/02

DISCOVERY GUIDELINES

In order to obtain the most effective service, please:

1. Make available for inspection **all physical evidence**, e.g., vehicles, equipment, machinery, tools, accident location.
2. Make available all photographs. Photographs are the most useful form of indirect evidence. **PLEASE OBTAIN ORIGINALS OF ALL PHOTOGRAPHS, NO MATTER WHAT THE COST. THIS WILL SAVE YOU MONEY.** Copy prints or photocopies will lose from 50% to 99% of the information.
3. Obtain **readable** police report, O.S.H.A. reports, repair bills, estimates, repair histories, appraisals, purchase orders, **originals** of oversize diagrams. We recommend that you depose police officers or other officials **ASAP** before other similar incidents can blur their recollection of the specific case.
4. Obtain **witness statements**, especially those containing spontaneous utterances.
5. Send **depositions** of all witnesses to the incident and competing or overlapping expert witnesses.
6. Provide **exhibits to depositions**.
7. Send answers to interrogatories about the incident.
8. It is usually not necessary to send pleadings, complaints, demands for production, requests for admissions, certificates of mailing, or boilerplate.
9. Please provide a description of injuries, admitting diagnosis report, **I.M.E.**, or a coroner's report. **BIOMECHANICAL ENGINEER REQUIRES COMPLETE MEDICALS.**

To avoid duplication of effort, John Fiske Brown Associates, Inc. strongly recommends that relevant evidence, as outlined above, be provided **as soon as possible**. This will avoid re-work that can occur when a late discovery item contradicts earlier evidence.

Thank you for your cooperation.

JOHN FISKE BROWN ASSOCIATES, INC.