

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI
DADE COUNTY, FLORIDA

CASE NUMBER: 07-41496 CA 21

WINSLIGHT BAPTISTE,

Plaintiff,

vs.

KS & P RESTAURANTS, LLC

Defendant.

RECEIVED
2/20/10

REQUEST TO PRODUCE

Defendant, KS & P RESTAURANTS, LLC, by and through undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.350, requests the Plaintiff, WINSLIGHT BAPTISTE, to produce the following for inspection and/or copying at the Law Office of Robert F. Tacher, Attention: **ROBERT F. TACHER, ESQUIRE**, 3230 West Commercial Boulevard, Suite 250, Fort Lauderdale, Florida 33309, within thirty (30) days:

For each and every item not produced, for which you claim privilege, please provide a privilege log pursuant to Florida Rule of Civil Procedure.

1. Any and all medical or related bills, paid or owing, allegedly resulting from the accident, incident or occurrence.
2. Any and all medical reports, doctor reports, or reports rendered by experts applicable to any and all issues in this case.
3. Any and all x-rays; x-ray reports; MRI films; MRI reports or other diagnostic testing applicable to any and all issues in this case.
4. Any and all photographs (laser copies), graphs, charts and other documentary evidence of the scene involved in or pertaining to the subject incident in this cause.
- ✓ 5. Any and all income tax records and W2 forms for the past five (5) years, including any and all schedules and attachments, and any other evidence of earnings from any source, through and including the date of your response. (for the current tax year or those where you have no return prepared, your checks and/or pay stubs)

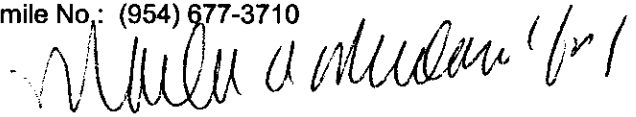
6. Any and all statements taken of any witness or party to the lawsuit by you, your attorneys, your representatives, agents, or anyone else on behalf of the Plaintiff.
7. A copy of the front and back sides of Plaintiff's(s') driver's license(s).
8. A copy of any "Mary Carter" or other similar agreement entered into by the Plaintiff and anyone else which pertains in any way to incident alleged in your complaint.
9. Any and all reports rendered by experts applicable to any of the issues in this cause.
10. Copies of any policies of insurance which have provided or may provide any benefits to you as a result of the injuries alleged in your complaint, including but not limited to liability policies, disability policies, homeowners policies, health insurance policies.
11. The shoes the Plaintiff was wearing at the time of the incident alleged in Plaintiff's complaint.
12. Any and all bills, charge receipts, or any other documentation evidencing why you were at the defendant's premises at the date and time indicated in complaint.
13. A photograph of Plaintiff taken within the last year.

The requested documents constitute or contain matters within the scope of Rule 1.280(b), Florida Rules of Civil Procedure, and are in the possession or control of the party to whom the request is directed.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail December _____, 2007 to: Justin Ziegler, Esquire, Justin Ziegler, PL, One Dattran Center, Suite 512 9100 S. Dadeland Blvd., Miami, Florida 33156.

LAW OFFICES OF ROBERT F. TACHER
Counsel for KS & P RESTAURANTS, LLC
3230 West Commercial Blvd., Suite 250
Fort Lauderdale, FL 33309
Telephone No.: (954) 677-3700
Facsimile No.: (954) 677-3710

FILE NO: 070404
Claim No. CDD4624
MAM/vss
Charles Kraemer, Travelers Ins.

By: 
ROBERT F. TACHER, ESQ
Florida Bar Number: 231592