

HIR/dmj/07-0472

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

POSTED
9/5/07
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CASE NO. 07-24167-CA-03

FLORIDA BAR NO. 525022

EMILIO PINERO,

Plaintiff,

vs.

WEST GARDENS VILLAGE CONDOMINIUM
ASSOCIATION, INC. and JR GONZALEZ &
ASSOCIATES, INC.,

Defendants.

REQUEST TO PRODUCE TO PLAINTIFF

COMES NOW the Defendant, WEST GARDENS VILLAGE CONDOMINIUM ASSOCIATION, INC., by and through undersigned counsel, and hereby requests the Plaintiff, EMILIO PINERO, to produce the following documents, or legible copies of the following documents, at the offices of Cooney, Mattson, Lance, Blackburn, Richards & O'Connor, P.A., 1600 West Commercial Boulevard, Suite 200, PO Box 14546, Fort Lauderdale, Florida, within thirty (30) days of the date of this Request:

1. Complete Federal Income Tax Returns with all attached schedules and Forms (such as W-2 Forms) for the five years preceding the year of the incident which is the subject of this lawsuit.
2. Complete Federal Income Tax Returns with all attached schedules and Forms for the year of the incident which is the subject of this lawsuit.

3. Complete Federal Income Tax Returns with all attached schedules and Forms for each of the years since the year of the incident which is the subject of this lawsuit.
4. Proof of all earned income and proof of all non-earned income for any year that a Federal Income Tax Return has not been filed.
5. Complete medical records of each physician that examined or treated the Plaintiff and which were made during the course of examining or treating the Plaintiff since the incident which has given rise to the subject lawsuit and for the five (5) year period of time preceding the incident which has given rise to the subject lawsuit.
6. Complete copies of reports prepared by each physician that examined or treated the Plaintiff since the incident which has given rise to the subject lawsuit and for the five (5) year period of time preceding the incident which has given rise to the subject lawsuit.
7. Complete hospital records pertaining to the Plaintiff since the incident which has given rise to the subject lawsuit and for the five (5) year period of time preceding the incident which has given rise to the subject lawsuit.
8. All medical bills incurred as a result of the incident which is the subject matter of this litigation.
9. All photographs which depict conditions which have changed since the time of the incident which is the subject of this lawsuit.
10. All photographs which the Plaintiff intends to place into evidence or use at trial.
11. All photographs not produced in response to the two preceding paragraphs.
12. All statements of the Defendant including, but not limited to, statements taken from agents, servants, or employees of the Defendant.

13. All statements which the Plaintiff intends to place into evidence or use at trial.
14. All statements not produced in response to the preceding two paragraphs.
15. Repair estimates and repair bills for property damage or loss in the incident which is the subject of this litigation.
16. Bills, receipts, or other evidence of expenses incurred as a result of the incident which is the subject of this litigation and not produced in response to Paragraphs 7 or 15.
17. All documents supporting the claim for money damages in this lawsuit and not produced in response to the preceding paragraphs.
18. A copy of the Plaintiff's driver's license.
19. A report of each person whom the Plaintiff expects to call as an expert witness at trial.
20. A copy of the Plaintiff's marriage license.
21. As to each type of insurance in force in favor of the Plaintiff including, but not limited to, medical insurance, hospitalization insurance, Medicare, Medicaid, disability insurance, medical payments insurance, personal injury protection, health insurance and accident insurance:
 - a) Copies of each such contract or policy;
 - b) The Identification Card of each such contract or policy;
 - c) The Declaration Sheet of each such contract or policy;
 - d) Each and every application for benefits made by the Plaintiff under any of the policies, whether pertaining to the accident which is the subject of this litigation or not;
 - e) All records of payments, checks, check stubs, memos and correspondence relating to payments made under any of the policies referred to above.

WE HEREBY CERTIFY that a true copy of the foregoing was mailed on this 27th day of August 2007 to: Joseph A. Glick, Esq., Joseph A. Glick, P.A., 7300 North Kendall Drive, Suite 380, Miami, FL 33156; Justin S. Ziegler, Esq., Justin Ziegler, P.L., 9100 S. Dadeland Blvd., Suite 908, Miami, FL 33156.

COONEY, MATTSON, LANCE, BLACKBURN,
RICHARDS & O'CONNOR, P.A.
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(954) 568-6669

JOHN H. RICHARDS

By: _____
JOHN H. RICHARDS