



JZ helps  
an injury law firm

1450 Madruga Ave.  
Suite 200  
Coral Gables, Florida 33146

Tel: 305 661 9977  
Fax: 786 472 4179

[jzhelps.com](http://jzhelps.com)  
[jz@jzhelps.com](mailto:jz@jzhelps.com)

Today's date

Walmart  
(Insert Locate Store Address)

Sent Via Certified U.S. mail Return Receipt # xxxx xxxx and fax to (area code) phone number

Claims Management, Inc.  
Liability Claims  
PO Box 1288  
Bentonville, AR 72716-1288

Sent Via Certified U.S. mail Return Receipt # xxx xxxx xxxx

RE: Our Client: First and Last Name  
Date of Accident: On or about x/x/13  
Store where incident occurred: **Walmart Supercenter**  
(Insert Locate Store Address)  
Location within the store: At or near checkout aisle

Dear Walmart,

Please be advised that my firm has taken over the representation of (Insert Name) for injuries to her knee received as a result of a fall which occurred at the Walmart at the address listed above. She received medical treatment to her knee following the incident, and is going to see a doctor to examine her knee. Pursuant to Florida Statute Section 627.4137, I hereby request that you provide to me, within 30 days of this written request, a statement under oath of a corporate officer, or of your claims manager or superintendent setting forth the following information with regard to each known policy of liability insurance, including excess or umbrella insurance:

- (1): the name and address of each insurer;
- (2): the name and address of each insured;
- (3): the limits of liability insurance applicable to each such policy;
- (4): a statement of any policy or coverage defenses which reasonably believe are available or have been asserted;

I also hereby request that you furnish to me within 30 days of this written request a copy of each such policy as provided by statute. Further, should you discover facts calling for an amendment to your statement we would expect the amendment be made immediately upon such discovery.

Please open a medical payments claim. Please preserve the following items listed below. The law may also impose you a duty to preserve additional items other than those listed below. For the items listed below, the word Plaintiff may be used in lieu of (insert name of Plaintiff). The word Defendant may be used in lieu of Walmart.

1. any and all complete photographs of any nature, whether still, video, computer animated, hand drawn, or in any other form, that were generated at any time regarding this incident.
2. any and all correspondence, reports, opinions, writings of any kind, photographs, videotapes, and/or reports of any type provided to anyone retained by Defendant, any other persons assisting the retained individuals, and/or other persons to whom those individuals have subcontracted work in connection with assignments given to the individuals or retained on behalf of the Defendant.
3. Any and all notes, diary entries, or timed observations prepared by any investigators, surveillance operators, or any other agents of the Defendant, the Defendant's attorneys, and/or any insurance carrier in the course of making any videotapes, films, photographs, and/or other recorded surveillance of the Plaintiff(s).
4. Any and all correspondence that governs, dictates, and/or specifies the means, manner, and/or method of the making of any videotapes, films, photographs, and/or other recorded surveillance of Plaintiff(s).
5. Any and all correspondence to or from the Defendant, the Defendant's attorneys, and/or insurance carrier that governs, dictates, and/or specifies a means, manner, and/or method of any surveillance, canvassing, investigations, examinations, tests, and/or analysis relevant to this incident.
6. Any and all statements of the Plaintiff.
7. Any and all statements of eyewitnesses to the accident in this case.
  - a) Any name of eyewitnesses, including, but not limited to those after the fact.
8. Any and all insurance policies providing benefits or coverage to the Plaintiff for any claimed injury or damage from the subject accident, including policies providing medical payments coverage or other coverage for Plaintiff's medical expenses.

9. Any and all photographs or movies of the scene or parties involved in or pertaining to the subject accident depicting conditions which have changed since the time those photographs or movies were taken and/or of which the substantial equivalent cannot be obtained by Plaintiff without undue hardship.

10. Any and all notices or reports of accidents in the same area as the accident in this case or accidents that happened in a similar manner as the instant accident for any and all Walmart stores owned, operated, controlled and/or managed by the defendant.

11. All photographs or videos of the condition on which Plaintiff allegedly fell.

12. Produce any and all store security videos/pictures, depicting Plaintiff's fall and/or the subject area, in the week before, the day of, and the week after the alleged incident. Any and all store security videos/pictures videos for the entire store for the week before, the day of, and the week following the Plaintiff's fall.

13. Any work schedules indicating the names of the employees who were working at or near the scene of the accident. The work schedules for all employees working during the week which includes the date of the incident.

14. All cleaning and inspection logs for the date of the incident.

15. Any and all records, logs, diaries, calendars, work orders, invoices, and any and all other documents which describe or refer to any cleaning or maintenance to the flooring or drainage at or around the area where the above individual fell, and which were generated at anytime within three years before the subject accident.

16. Any and all records, logs, diaries, calendars, work orders, invoices, and any and all other documents which describe or refer to any repairs, modifications, or construction to the flooring or drainage, in or around the area where above individual fell, and which were generated at anytime within three years before the subject accident.

17. Any and all records, logs, diaries, calendars, work orders, invoices and any and all other documents which describe or refer to any cleaning or maintenance to the flooring or drainage, in or around the area where the Plaintiff fell, and which were generated at anytime from the date of

the subject accident through the conclusion of this claim.

18. Any and all records, logs, diaries, calendars, work orders, invoices, and any and all other documents which describe or refer to any repairs, modifications, or construction to the flooring, drainage, or steps in or around the area where above individual fell, and which were generated at anytime from the date of the subject accident through the conclusion of this claim.

19. The incident report.

Under Florida law, if you fail to preserve said evidence, you may face penalties as determined by the court. Please also send me the video of the entire day of the incident immediately. Please find attached any medical records and bills regarding this incident. Thank you for your prompt attention to this matter.

Sincerely,

Justin Ziegler