



# REPRESENTING THE PERSONAL INJURY PLAINTIFF IN NEW YORK<sup>†</sup>

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## A. Intake and Client Retention

[PI001](#) Sample Client Intake Form

[PI002](#) \* Statement of Client's Rights

[PI003](#) \* Statement of Client's Responsibilities

[PI004](#) Judicial Conference Retainer Statement

[PI005](#) Sample Language for Personal Injury Retainer Agreements

## B. Investigation and Securing of Medical and Other Records

[PI006](#) HIPAA Compliant Unlimited Authorization for Plaintiff's Counsel to Secure Client's Records

[PI007](#) Letter from Plaintiff's Counsel to Doctor's Office Explaining HIPAA, Enclosing HIPAA Compliant Authorization, and Detailing What Is Being Requested

[PI007A](#) Plaintiff's Arons/Porcelli Speaking Authorization for Defendants

## C. Automobile Negligence and Insurance Related Forms

[PI008](#) Underinsured/Uninsured Notification Letter

[PI009](#) Sample New York No-Fault Computation Sheet

[PI010](#) Request for Driving Abstract

[PI011](#) Letter of Representation to Defendant Owner and Driver

[PI012](#) Pre-Suit Demand Letter for Insurance Information Under Insurance Law § 3420(f)(2)(A)

\* This form is in PDF format and requires Adobe Reader or other suitable software

† Some of the forms contained in *Representing the Personal Injury Plaintiff in New York* are omitted from this table of forms because they are available from government agencies. The current versions of these forms are obtainable from the following government agencies: the Official New York City Website ([www.nyc.gov](http://www.nyc.gov)), the New York State Unified Court System ([www.nycourts.gov](http://www.nycourts.gov)), the New York State Department of Motor Vehicles ([www.dmv.ny.gov/forms](http://www.dmv.ny.gov/forms)), and the New York State Department of Financial Services ([www.dfs.ny.gov](http://www.dfs.ny.gov)).

## **D. Commencing the Litigation**

[PI013](#) \* Court Summons

[PI014](#) Certificate of Merit (No Issue with Statute of Limitations) for Medical Malpractice Action

[PI015](#) Verified Summons and Complaint in a Medical Malpractice Action Involving Wrongful Death of an Infant with Attorney Verification

[PI016](#) Notice of Commencement of Medical Malpractice Action

[PI017](#) Verified Summons and Complaint in an Automobile Negligence Case for Individual Plaintiff and Attorney Verification

[PI018](#) Statement of Service by Mail and Acknowledgment of Receipt by Mail of Summons and Complaint

## **E. Discovery and Amplification of Pleadings**

[PI019](#) Plaintiff's Verified Bill of Particulars in a Medical Malpractice Action Involving Wrongful Death of an Infant

[PI020](#) Plaintiff's Notice of Availability for Physical Examination

[PI021](#) Plaintiff's Notice to Admit

[PI022](#) Plaintiff's General Combined Demands with a Demand for a Verified Bill of Particulars on Defendant's Affirmative Defenses

[PI023](#) Plaintiff's Notice to Produce Documents in a Product Defect Case with Jurisdictional and Successor Liability Issues as to Certain Defendants

[PI024](#) Plaintiff's Combined Discovery Demands and Notice for Discovery and Inspection in Medical Malpractice Case

[PI025](#) Deposition Exhibit Log

## **F. Trial and Verdict**

- [PI026](#) Note of Issue, Certificate of Readiness and Verification
- [PI027](#) Certificate of Readiness and Verification
- [PI028](#) Notice of Intention to Introduce X-Ray(s)
- [PI029](#) Trial Exhibit List (Internal Use Only)
- [PI030](#) Trial Notebook Index (Internal Use Only)
- [PI031](#) Jury Selection Record (Internal Use Only)
- [PI032](#) Trial Schedule
- [PI033](#) Plaintiff's Request to Charge in a Medical Malpractice Case
- [PI034](#) Plaintiff's Request to Charge in a Motor Vehicle Negligence Case
- [PI035](#) Plaintiff's Proposed Verdict Sheet in a Medical Malpractice Case

## **G. Settlement and Closing of Case**

- [PI036](#) General Release
- [PI037](#) Standard Stipulation of Discontinuance
- [PI038](#) CPLR 5003-a Letter to Defendant Transmitting Settlement Documents
- [PI039](#) Judicial Conference Closing Statement
- [PI040](#) Client Disbursement Accounting
- [PI041](#) Trial Preparation Checklist