

IN THE CIRCUIT COURT OF THE \_\_\_\_\_  
JUDICIAL CIRCUIT IN AND FOR \_\_\_\_\_  
\_\_\_\_\_ COUNTY, FLORIDA

CASE NO.:

\_\_\_\_\_,  
Plaintiffs,

vs.

\_\_\_\_\_,  
Defendants.

\_\_\_\_\_/

**READ THE RULES INDEPENDENTLY FOR THE  
REQUIREMENTS. These are prompts only.**

**PLAINTIFF’S INITIAL DISCOVERY DISCLOSURE**

COMES NOW, the Plaintiff, \_\_\_\_\_, by and through the undersigned Counsel, and pursuant to Florida Rule of Civil Procedure 1.280(a), provides the following initial discovery disclosures as follows:

**A. Individuals likely to have discoverable information**

1. Plaintiff’s treating medical providers as follows:
  - a. Doctor 1
  - b. Doctor 2

The Plaintiff’s treating medical providers have knowledge regarding the diagnosis, treatment, prognosis, and overall care related to the injuries sustained. This includes the nature and extent of the injuries, causation, the consistency of the injuries with the described crash, pre-existing conditions, treatments provided, the costs of medical care, recommendations for future

treatment, and any resulting impairments or disabilities. The Plaintiff's treating medical providers will also have knowledge regarding the noneconomic damages suffered by Plaintiff.

2. Record custodians for the Plaintiff's treating medical providers identified in A.1. above and C.1. below. The record custodians for the plaintiff's medical providers have knowledge regarding the authenticity, maintenance, and content of the plaintiff's medical and billing records, including charges incurred for treatment, payments received, and balances owed.
3. Plaintiff (THIS IS A PROMPT)
4. Defendant (THIS IS A PROMPT)
5. Each person on the crash report/ incident report may have knowledge regarding the crash (THIS IS A PROMPT)
- 6.
7. Eye witnesses known by our Client (THIS IS A PROMPT)
8. Investigating officer. The investigating officer may have knowledge regarding the details of the crash, including the scene investigation, parties involved, statements taken, physical evidence collected, citations issued, and any conclusions or observations documented in the crash report.
9. Before and after witnesses (THIS IS A PROMPT)

**B. Documents, ESI and tangible things supporting Plaintiff's claims:**

1. Plaintiff's crash related medical records and bills are located at the offices of the medical providers identified in paragraph A.1. above and C.1. below. The documents are located at the individual provider's offices. To the extent they are in the Plaintiff's possession, copies will be made available upon request.
2. The **Incident/crash** report is located at the undersigned's office.
3. CAD reports are located at the undersigned's office.
4. 911 audio recordings are located at the undersigned's office.
5. Body worn camera and dash camera video footage from the scene of the crash are located at the undersigned's office.

6. Pictures of the Plaintiff's injuries are located at the undersigned's office
7. Pictures of the scene of the [Prompt, Incident/crash?] are located at the undersigned's office.
8. Pictures of the damage to the Plaintiff's vehicle are located at the undersigned's office.
9. Pictures of the damage to the Defendant's vehicle are located at the undersigned's office.
10. Estimate of property damage to Plaintiff's vehicle is located at the undersigned's office.
11. Estimate of property damage to Defendant's vehicle is located at the undersigned's office.
12. EDR download from Defendant's vehicle, is located at the undersigned's office / is believed to be in Defendant's possession (or Defendant's insurer, attorney, or other agent) .
13. EDR download from Plaintiff's vehicle is in the possession of Defendant/Defendant's insurer.
14. Pictures of the Plaintiff's injuries are located at the undersigned's office.
15. A CD with the Plaintiff's MRI imaging is located at the undersigned's office.
16. Plaintiff's wage and payroll records are located at \_\_\_\_\_.

**C. Computation for each category of damages claimed by Plaintiff:**

1. Past medical expenses as follows:
  - a. Doctor/Facility Name A: \$ \_\_\_\_\_
  - b. Doctor/Facility Name B: \$ \_\_\_\_\_

Plaintiff's injuries are permanent in nature and medical expenses are expected to increase.

2. Future medical expenses: These amounts will be computed based on the opinions and estimates provided by [Prompt, Client: his, her, their] medical providers as treatment progresses and her condition is further evaluated.
3. Lost Wages: \_\_\_\_\_
4. Non-economic damages including pain and suffering, inconvenience, physical impairment, mental anguish, disfigurement, and loss of capacity for enjoyment of life.

Pursuant to Florida Rule of Civil Procedure 1.280(a)(1)(C), copies of the evidentiary documents supporting the computations above and the nature and extent of the injuries suffered are served at the following link for download:

\_\_\_\_\_.

**D. Insurance policies or agreements under which an insurance business may be liable to satisfy all or part of a judgment are available for download at the above referenced link.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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