

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

JOHN SMITH,)	
)	
Plaintiff,)	
)	
v.)	No. 1-02-0111/JURY DEMAND
)	
ABC CORPORATION,)	District Judge ____
)	Magistrate Judge ____
Defendant.)	

PLAINTIFF’S INITIAL RULE 26 DISCLOSURES

The Plaintiff, John Smith, hereby provides the initial disclosures required by Federal Rule of Civil Procedure 26(a)(1). These disclosures are based on information reasonably available to the Plaintiff as of the date these disclosures are served. By making these disclosures, the Plaintiff does not represent that she is identifying every document, tangible thing, or witness possibly relevant to this lawsuit. The Plaintiff reserves the right to supplement these disclosures as necessary and as permitted by Federal Rule of Civil Procedure 26(e).

I. Rule 26(a)(1)(A) disclosures

The name and, if known, the address and telephone number of each individual likely to have discoverable information that the Plaintiff may use to support her claims or defenses (other than expert witnesses whose disclosure is governed by separate requirements), unless solely for impeachment, identifying the subjects of the information:

- A. Plaintiff.
- B. Defendant.
- C. Witnesses on crash report.
- D. Investigating police officer.

II. Rule 26(a)(1)(B) disclosures

A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the Plaintiff and that the Plaintiff may use to support its claims or defenses, unless solely for impeachment:

Enclosed herein are documents bates stamp numbered _____ to _____. The Plaintiff will supplement as additional documents become available.

III. Rule 26(a)(1)(C) disclosures

A computation of any category of damages claimed by the Plaintiff, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

Enclosed herein are invoices, bates stamp numbered _____ to _____, for _____ [decedent's] medical and funeral expenses related to the wreck. Also enclosed is a medical itemization summarizing the medical expenses, bates stamp numbered _____ to _____. The Plaintiff will supplement as additional documents and information becomes available.

IV. Rule 26(a)(1)(D) disclosures

For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Enclosed herein is a copy of the Plaintiff's automobile insurance policy, including the Plaintiff's underinsured motorist coverage, bates stamp numbered ____ to ____.

Respectfully submitted,

John A. Day, No. 9416
Rebecca C. Blair, No. 17939
Brandon E. Bass, No. 22014
Branham & Day, P.C.
5300 Maryland Way
Suite 300
Brentwood, TN 37027
(615) 742-4880

CERTIFICATE OF SERVICE
