

Civil Procedure for R.I. Paralegals

First Edition - 2000 Printing

Sample Pleadings in a Auto Accident Case

The following documents are designed to show the kinds of pleadings that may arise in a civil lawsuit. The typical case would not have all of these pleadings, but this sample was set up to show the range of pleadings that are possible and the interrelationship between them. The sample shows (1) a complaint, which starts off the lawsuit; (2) one of the defendant's answer; (3) a second defendant's answer which includes a counterclaim against one of the plaintiffs and a cross-claim against the other defendant; (4) the reply to the counterclaim by the plaintiff; (5) the answer to the cross-claim by the other defendant; (6) a third party complaint by one of the defendants against a new party who is or may be liable for the damages sought in the lawsuit; and (7) the answer to the third party complaint. Studying these sample pleadings should give the student a complete overview of and a solid grasp of the function of pleadings in a lawsuit, which is to define the issues in terms of the claims and defenses asserted by each of the parties. Pleadings set the stage for the two other major areas of civil litigation we will be studying - motions and discovery - but pleadings are the foundation on which the entire civil action rests.

COUNT II

1. Paragraph 1 and Paragraph 2 of Count I are hereby incorporated as Paragraph 1 and Paragraph 2 of this Count II.
3. On or about February 1, 1995, Plaintiff Linda Hopkins was a passenger in the automobile of Plaintiff Thomas Dorr, and which automobile was on said Route 6, a public highway in the City of Providence, Rhode Island.
4. The vehicle owned by the Defendant Tri-State and operated by the Defendant Edwards did negligently collide with and strike the rear of Plaintiff Thomas Dorr's automobile on said date, damaging the Plaintiff Linda Hopkins.
5. Plaintiff Linda Hopkins's damages consist of:
 - A. Expenses for medical treatment and hospitalization
 - B. Expenses for future medical treatment
 - C. Loss of wages
 - D. Future loss of wages
 - E. Conscious pain and suffering
 - F. Future conscious pain and suffering
 - G. Permanent injuries to the affected parts.

WHEREFORE:

- A. Plaintiff Thomas Dorr demands judgment against the Defendants, jointly or severally as the law allows, in an amount sufficient to invoke the jurisdiction of the court, together with interest and costs.
- B. Plaintiff Linda Hopkins demands judgment against the Defendants, jointly or severally as the law allows, in an amount sufficient to invoke the jurisdiction of the court, together with interest and costs.

Plaintiffs hereby claim a trial by jury and designates Roger Williams as trial counsel.

Thomas Dorr & Linda Hopkins
By Their Attorney,

Roger Williams #8888
Williams and Jones
High Point Building
Narragansett Bay, Rhode Island 02000
(401) 222-6666
DATED: January 30, 1997

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

THOMAS DORR, et al.	:	
Plaintiffs	:	
	:	
v.	:	C.A. No. 97-10000
	:	
PETER EDWARDS, et al.	:	
Defendants	:	

ANSWER OF DEFENDANT, PETER EDWARDS

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 of Count I.
2. Defendant admits the allegations of Paragraph 2 of Count I.
3. Defendant denies the allegations of Paragraphs 3 and 4 of Count I.
4. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5 of Count I.
5. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 of Count II.
6. Defendant admits the allegations of Paragraph 2 of Count II.
7. Defendant denies the allegations of Paragraph 3 and 4 of Count II.
8. Defendant is without knowledge and information sufficient to form a belief as to the truth of the allegations of paragraph 5 of Count II.

FIRST DEFENSE

_____ If the Plaintiffs were injured then their injuries were caused by their own negligence in that the Plaintiff Thomas Dorr negligently backed into vehicle operated by this Defendant.

WHEREFORE, Defendant Peter Edwards demands judgment against the Plaintiffs on Plaintiffs' Complaint and that said Complaint be denied and dismissed against him.

Defendant, Peter Edwards, claims a trial by jury.

Peter Edwards
By His Attorney,

Harry Keenan #9999
Lowridge Road,
West Kingston, Rhode Island 02800
(401) 111-7777
DATED: February 14, 1997

Certificate of Service

I hereby certify that a true copy of the within pleading was sent, postage prepaid, to the following attorneys on the ____ day of _____, 1997:

Roger Williams, Esq.
Williams and Jones
High Point Building
Narragansett Bay, Rhode Island 02800

George Anderson, Esq.
Slow Street
North Warwick, R.I. 02900

WHEREFORE, Defendant, Tri-State Freight Lines, Inc., demands judgment against the Plaintiffs on Plaintiffs' Complaint and that said Complaint be denied and dismissed against it.

Defendant, Tri-State Freight Lines, Inc., hereby claims a trial by jury.

COUNTERCLAIM AGAINST
PLAINTIFF THOMAS DORR

1. On or about February 1, 1995 the truck of Defendant Tri-State was traveling easterly on a public highway in the City of Providence, Rhode Island, viz., Route 6 and was being operated with due care.
2. Plaintiff Thomas Dorr was on that date the owner and operator of an automobile, which was backing up against traffic on Route 6, a public highway, and negligently collided with Defendant Tri-State's truck.
3. As a result of the Plaintiff's negligence, Defendant Tri-State was damaged.
4. Defendant Tri-State's damages consist of:
 - A. The total destruction and loss of its 10 ton truck.
 - B. The loss of use of said vehicle and the earnings therefrom.

WHEREFORE, Defendant, Tri-State Freight Lines, Inc., demands judgment against Plaintiff Thomas Dorr in an amount sufficient to establish jurisdiction of this Court, together with interest and costs.

Defendant, Tri-State Freight Lines, Inc. claims a trial by jury.

CROSS-CLAIM AGAINST
DEFENDANT, PETER EDWARDS

1. On or about February 1, 1995, Defendant Edwards used Defendant Tri-State's truck without permission and against company regulations.
2. During this time and date Defendant Edwards was on a frolic totally unrelated to any business use of his employer and was not on any company time or function.
3. As a result of Defendant Edwards's negligence while operating the truck of Defendant Tri-State on said date, the Plaintiffs allegedly were injured.

4. If the Plaintiffs sustained injuries as alleged by them in their Complaint, and which injuries arose from negligence not of their own making, then the negligence was that of Defendant Edwards.
5. Defendant Tri-State specifically denies that Defendant Edwards was on the day or dates material hereto an agent and/or servant of Defendant Tri-State. Rather, Defendant Edwards was acting independently on a lark and frolic of his own without permission and consent of Defendant Tri-State.
6. Therefore, if Defendant Tri-State should be held liable for the negligence of Defendant Edwards, which negligence was not that of Defendant Tri-State, and which negligence it specifically denies, then Defendant Tri-State is entitled to recover from, or be indemnified by, Defendant Edwards for all sums adjudged against it in favor of Plaintiffs and resulting from the negligence of Defendant Edwards.

WHEREFORE, Defendant, Tri-State Freight Lines, Inc. demands judgment against Defendant, Peter Edwards, for all sums which may be adjudged against Defendant, Tri-State Freight Lines, Inc., in favor of the Plaintiffs.

Tri-State Freight Lines, Inc.
By Its Attorney,

George Anderson #7777
Slow Street
North, Rhode Island 02000
(401) 999-0000
DATED: February 18, 1997

Certificate of Service

I hereby certify that a true copy of the within pleading was sent, postage prepaid, to the following attorneys on the ____ day of _____, 1997:

Roger Williams, Esq.
Williams and Jones
High Point Building
Narragansett Bay, Rhode Island 02800

Harry Keenan, Esq.
Lowridge Road
West Kingston, Rhode Island 02800

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

THOMAS DORR, and LINDA HOPKINS,
Plaintiffs

v.

PETER EDWARDS, and
TRI-STATE FREIGHT LINES, INC.,
Defendants

:
:
:
:
:
:
:
:
:
:

C.A. No. 97-10000

PLAINTIFF THOMAS DORR’S REPLY TO DEFENDANT,
TRI-STATE FREIGHT LINES, INC.’S COUNTERCLAIM

1. Plaintiff Thomas Dorr admits the allegations of Paragraph 1 of Defendant’s Counterclaim except for the particular allegation of “due care” which allegation Plaintiffs specifically deny.
2. Plaintiff Thomas Dorr denies the allegations of Paragraph 2 and 3 of Defendant’s Counterclaim.
4. Plaintiff Thomas Dorr is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of the Counterclaim.

FIRST DEFENSE:

Plaintiff Thomas Dorr was lawfully stopped in traffic and was rear-ended by Defendant Tri-State’s truck then and there being negligently operated by Defendant Tri-State’s servant and agent, Defendant Peter Edwards.

WHEREFORE, Plaintiff Thomas Dorr demands judgment on Defendant’s Counterclaim and that said Counterclaim be denied and dismissed.

Thomas Dorr
By His Attorney,

Roger Williams #8888
High Point Building
Narragansett Bay, Rhode Island 02800
(401) 222-6666
DATED: February 25, 1997

Certificate of Service

I hereby certify that a true copy of the within pleading was sent, postage prepaid, to the following attorneys on the ____ day of _____, 1997:

George Anderson, Esq.
Slow Street
North Warwick, Rhode Island 02900

Harry Keenan, Esq.
Lowridge Road
West Kingston, Rhode Island 02800

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

THOMAS DORR, and LINDA HOPKINS,
Plaintiffs

v.

PETER EDWARDS, and
TRI-STATE FREIGHT LINES, INC.,
Defendants

:
:
:
:
:
:
:
:

C.A. No. 97-10000

DEFENDANT PETER EDWARDS' ANSWER
TO DEFENDANT, TRI-STATE FREIGHT LINES, INC. CROSS-CLAIM

Defendant Peter Edwards denies each and every allegation of Defendant, Tri-State Freight Lines, Inc.'s Cross-claim against him.

FIRST DEFENSE

_____ Defendant Peter Edwards was at all times acting within the scope of his employment with Defendant, Tri-State Freight Lines, Inc., and had the specific permission and specific consent of Tri-State Freight Lines, Inc. to use the vehicle for personal use.

Defendant Peter Edwards hereby claims a trial by jury.

By His Attorney,

Harry Keenan #9999
Lowridge Road,
West, Rhode Island 02000
(401) 111-7777
DATED: February 28, 1997

Certificate of Service

I hereby certify that a true copy of the within pleading was sent, postage prepaid, to the following attorneys on the ____ day of _____, 1997:

Roger Williams, Esq.
High Point Building
Narragansett Bay, Rhode Island 02800

George Anderson, Esq.
Slow Street
North Warwick, Rhode Island 02900

WHEREFORE, Tri-State Freight Lines, Inc., Defendant and Third Party Plaintiff, demands judgment against Ocean State Brakes Co., Inc., Third Party Defendant, for all sums that may be adjudged against Tri-State Freight Lines, Inc., as Defendant, in favor of Plaintiffs, together with all costs incident to the defense of the principal suit.

Defendant, Tri-State Freight Lines, Inc., hereby claims a trial by jury.

Tri-State Freight Lines, Inc.
By Its Attorney,

George Anderson #7777
Slow Street
North Warwick, Rhode Island 02900
(401) 999-0000
DATED: February 22, 1995

Third Party Defendant, Ocean State Brakes Co., Inc., hereby claims a trial by jury.

Ocean State Brakes Co., Inc.
By Its Attorney,

Sarah Duff # 6666
75 Sugar Street
South Wickford, Rhode Island 02800
(401) 555-8888
DATED: March 8, 1997

Certificate of Service

I hereby certify that a true copy of the within pleading was sent, postage prepaid, to the following attorneys on the ____ day of _____, 1997:

Roger Williams, Esq.
Williams and Jones
High Point Building
Narragansett Bay, Rhode Island 02800

George Anderson, Esq.
Slow Street
North Warwick, R.I. 02900

Harry Keenan, Esq.
Lowridge Road
West Kingston, Rhode Island 02800

Sample Slip & Fall Interrogatories

STATE OF RHODE ISLAND
WASHINGTON, SC.

SUPERIOR COURT

LOUISE BLACK, :
Plaintiff :
 :
v. :
 :
BIG RAY'S MARKET, INC., :
Defendant :

C.A. No. 99-3456

PLAINTIFF'S INTERROGATORIES TO BE ANSWERED
BY DEFENDANT

Pursuant to Rules 26 and 33 of the Superior Court Rules of Civil Procedure, the Plaintiff hereby submits the following interrogatories are to be answered by the Defendant under oath within forty days from the date of service hereof:

1. Please state the name, home address, business address, age, occupation and capacity with the Defendant of the person answering these interrogatories.
2. Please state the name and address of the person, firm or corporation which owns the building where Big Ray's Market at 100 Elm Street, so called, in Warwick is located.
3. Please state the name and address of all employees of the Defendant who were on the premises of the Warwick store between the hours of 9 a.m. and 5 p.m. on (Date).
4. Does the Defendant deny that the Plaintiff suffered a fall and injuries resulting therefrom in the store located in Warwick on or about (Date)?
5. If not, please provide:
 - (a) the area of the store in which the Plaintiff fell,
 - (b) a description of the floor in the area of where the Plaintiff fell , and
 - (c) how the Plaintiff came to fall on the floor in the Defendant's place of business.
6. Does the Defendant or any of its agents or servants have any knowledge of the facts described in the Plaintiff's Complaint?

7. If so, please state
 - (a) the name, address and capacity with the Defendant of any such person having such knowledge,
 - (b) whether or not each such person still remains in the employ of the Defendant, and
 - (c) whether or not each such person was an eye witness to the Plaintiffs fall.

8. If so, please state:
 - (a) the names and addresses of each such person,
 - (b) the date of each fall,
 - (c) whether any claims were made against the Defendant,
 - (d) whether any such claims were litigated, and
 - (e) a description of the caption and number of the case as well as the results of any litigation.

9. When did any agent or servant of the Defendant first see the Plaintiff subsequent to her fall on (Date)?

10. With respect to the above, please state
 - (a) the name, address and capacity with the Defendant of each such person who first saw the Plaintiff,
 - (b) what the Plaintiff was doing at that time,
 - (c) whether any such person had a conversation with the Plaintiff at that time, and
 - (d) with respect to such conversation, please state the nature and contents.

11. Did the Defendant have a policy of liability insurance covering any liability arising out of the Defendant's ownership or occupancy of the store in Warwick, Rhode Island, on (Date)?

12. If so, please state
 - (a) the terms of the policy,
 - (b) the name of the company issuing the policy, and
 - (c) the amount of coverage for liability.

13. On what specific facts does the Defendant rely upon in making its defense that it was not negligent in any way on (Date)?

14. Did the Defendant, or its agents or servants, have cause to have take any photographs of the area in which the Plaintiff fell?

15. If so, please indicate
 - (a) the date each photograph was taken,
 - (b) the number of photographs taken, and
 - (c) in whose custody such photographs now are.

16. Please state whether or not an examination was made of the area in which the Plaintiff fell subsequent to her fall on (Date), and if so, what the examination revealed.
17. Was the floor of the Defendant's premises cleaned or mopped on (Date), prior to the Plaintiff's fall, and if so, please state
 - (a) at what time the floor was cleaned,
 - (b) what type of machinery, tools, or utensils were used to clean the floor,
 - (c) what type of cleanser was used on the floor, and
 - (d) the name, address and capacity with the Defendant of the person who cleaned the floor.
18. Does the Plaintiff deny that the floor of the Defendant's premises was wet in the area where the Plaintiff fell at the time of her fall on (Date)?
19. Please state the name and address of the store manager of the Big Ray's Market at 100 Elm Street, so-called, in Warwick on (Date)?
20. Please describe how the fall complained of in the Plaintiff's Complaint occurred?
21. If a written or verbal statement has been taken from any person, please state
 - (a) the name and address of the person who gave the statement,
 - (b) the name and address and capacity of the person with the Defendant who took the statement,
 - (c) the date of the statement,
 - (d) whether the statement is oral or written, and
 - (e) who currently has custody of the statement.
22. Identify all expert witnesses whom you expect to testify at trial, and for each state:
 - (a) the name, address, and telephone number of the witness
 - (b) the subject matter on which the expert is expected to testify
 - (c) the substance of the facts and opinions to which the expert is expected to testify; and
 - (d) a summary of the grounds for each opinion

Louise Black
By Her Attorney,

George Z. Able #0000
Able & White
1000 South Smith Street
Providence, R.I. 02903
(401) 421-0000

Certificate of Service

I hereby certify that a true copy of the within document was sent, postage prepaid, to Roger Williams, Esq., Williams and Jones, High Point Building, Narragansett Bay, R.I. 02800 on the ____ day of _____, 1999:

Sample Slip & Fall Interrogatories

STATE OF RHODE ISLAND
WASHINGTON, SC.

SUPERIOR COURT

LOUISE BLACK,
Plaintiff

v.

BIG RAY'S MARKET, INC.,
Defendant

:
:
:
:
:
:
:
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:
:

C.A. No. 99-3456

DEFENDANT'S INTERROGATORIES TO BE ANSWERED
BY PLAINTIFF

Pursuant to Rules 26 and 33 of the Superior Court Rules of Civil Procedure, the Defendant hereby submits the following interrogatories are to be answered by the Plaintiff under oath within forty days from the date of service hereof:

1. Please state your full name, along with any other names by which you are known, your date of birth, Social Security Number, marital status, residence address, and business address.
2. State from your own knowledge the facts you possess in regard to the negligence alleged in the complaint.
3. Kindly give in detail the nature, extent and location of the injuries alleged to have been suffered by you and those injuries suffered by you, if any, which are alleged to be permanent in nature.
4. Please state the name and address of each doctor who treated you for injuries alleged, the date of each treatment, the nature of each treatment, and an itemized statement of the charges for such treatment.
5. If hospitalized as a result of the alleged injuries, please state the name of the hospital or hospitals in which you were confined, the nature of the treatment, the dates of such treatment, an itemized statement of the charges for said treatment and care, the period of confinement or confinements.

6. If you were employed or self-employed at the time of alleged accident or incident, please state the nature of your said employment and the length of time so employed; the name and address of your employer, if applicable; your average weekly or monthly earnings at the time of the alleged accident or incident; the period of time, including dates, during which you were prevented from carrying on your usual occupation; and state your actual total in dollars.
7. In relation to this action, please give an itemization of any expenses or losses not already set forth in answers to previous questions.
8. Please state the name and address of each witness which may have any knowledge concerning the alleged accident or incident who is known to you, your attorney, or any person acting in your behalf.
9. If you have received any money in full or partial settlement of any claim arising out of this incident from any person, firm or company or any benefits under the Workers' Compensation Act, please state the name and address of the person, firm or company from whom you received it, the date on which you received the money, the amount of money received, and whether or not you are willing to produce upon the defendant's request a copy of any covenant, release or discharge that may be in existence.
10. State whether any photographs were taken of the premises, vehicles, or scene of the accident or incident; by whom and when such photographs were taken; and the name and address of the person or persons who now have possession of them.
11. State whether or not you received unemployment compensation at any time subsequent to the date of the alleged accident. If you received unemployment compensation, please state the length of time you received it and the amount received.
12. If you had any injury, disease or abnormality of any kind prior to or subsequent to the accident or incident alleged in this action for which you sought medical attention, please state the time and place of such occurrence or occurrences; the nature and date of each such injury, disease or abnormality; the names and addresses of all hospitals and doctors who treated you for each such injury, disease or abnormality. Also state the dates of such treatment and the names and addresses of any and all persons against whom any claim was made or action commenced (giving name and location of such court or commission), as a result of such injury, disease or other abnormality.
13. If you had Blue Cross or any other type of health or accident insurance in effect at the time of the alleged accident, please state the name of the company or companies, the amount of money you received under such insurance, and the name or names of any doctors who may have examined you in relation to such insurance.

14. If household help was required, please state the name and address of such person or persons, the length of time required, the amount of money paid per week to each person hired, and your relationship (blood or otherwise) to any such person or persons.
15. If you are working at the present time, please state the name and address of your employer, if any; the nature of your work; the average weekly earnings from such work; and the length of time you have been engaged in such work.
16. State whether or not you have commenced an action against any other person or persons in connection with this incident, and if so, state the name or names of the parties sued, the court said action or actions are pending in, and the identifying number of said case or cases.
17. If any statements, reports, memoranda or other written materials have been obtained from any of the persons, please identify those persons who have given such statements, reports, memoranda or other written materials, including the name and address of the person in whose custody such items are at the present time.
18. Identify all expert witnesses whom you expect to testify at trial, and for each state:
 - (a) the name, address, and telephone number of the witness
 - (b) the subject matter on which the expert is expected to testify
 - (c) the substance of the facts and opinions to which the expert is expected to testify; and
 - (d) a summary of the grounds for each opinion
19. State the name and address of each person, firm or corporation by whom you were employed in the five years preceding your alleged injury and the nature of your employment by each such person, firm or corporation.
20. State the amount of money paid to you as wages in the eight weeks preceding your alleged injury, including the name and address of your employer.
21. State precisely and in detail how your alleged fall occurred, including exactly where and how you fell and where and how you landed.
22. State how you came to be in the defendant's premises.
23. State how you entered the premises of the defendants; how you got to the premises; the time of your arrival; and the time of the alleged fall.
24. State what you were doing during the time you were in the defendant's premises.

25. Did you consume any alcoholic beverages during the four-hour period prior to your alleged fall; if so, identify what was consumed, the quantity, and the time period same was consumed.
26. Did you take any drugs or medications during the four-hour period prior to your alleged fall; if so, identify what was taken, the quantity or amount, and the time period same was taken.
27. Describe the shoes you were wearing at the time of your alleged fall and describe any damage to same which occurred at the time of the fall.
28. Aside from traffic violations, have you ever been convicted of any offenses under the criminal laws of any state.
29. State whether or not you have or anyone in your behalf has made a claim against any person or corporation for injury by accident within the period of five years before or since the date of the incident set forth in the within complaint.
30. If your answer to the foregoing question is affirmative, state the date and place of each such injury, the injuries sustained, the name and address of the parties involved in each such incident and the name and address of each person against whom claim was made or suit was brought.

Big Ray's Market, Inc.
By Its Attorney,

Rogers Williams #9999
Williams and Jones
High Point Building
Narragansett Bay, R.I. 02800
(401) 295-0000

Certificate of Service

I hereby certify that a true copy of the within document was sent, postage prepaid, to George Z. Able, Esq., Able & White, 100 South Smith Street, Providence, R.I. 02900 on the ____ day of _____, 1999:

STATE OF RHODE ISLAND
WASHINGTON, SC.

SUPERIOR COURT

LOUISE BLACK,	:	
Plaintiff	:	
	:	
v.	:	C.A. No. 99-3456
	:	
BIG RAY'S MARKET, INC.,	:	
Defendant	:	

Notice of Deposition of Plaintiff, Louise Black

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Superior Court Rules of Civil Procedure, the defendant Big Ray's Market, Inc., acting by and through its attorneys, Williams and Jones, will take the deposition of Louise Black, Plaintiff at 10:00 A.M. on the 20th day of February, 2000, and continuing from day to day thereafter, at the offices of Williams and Jones, High Point Building, Narragansett Bay, Rhode Island.

In accordance with Rule 30(b), the parties are notified that the deposition shall be recorded by stenographic means, and not by any other method.

Big Ray's Market, Inc.
By Its Attorneys,

Rogers Williams #9999
Williams and Jones
High Point Building
Narragansett Bay, R.I. 02800
(401) 295-0000

Certificate of Service

I hereby certify that a true copy of the within document was sent, postage prepaid, to George Z. Able, Esq., Able & White, 100 South Smith Street, Providence, R.I. 02900 on the ____ day of _____, 1999:

STATE OF RHODE ISLAND
WASHINGTON, SC.

SUPERIOR COURT

LOUISE BLACK,
Plaintiff

v.

C.A. No. 99-3456

BIG RAY'S MARKET, INC.,
Defendant

Request for Production from Defendant to Plaintiff

Pursuant to Rules 26 and Rule 34 of the Superior Court Rules of Civil Procedure, the defendant Big Ray's Market, Inc. hereby requests that the plaintiff, Louise Black, produce and permit the defendant to inspect and copy at the offices of Williams and Jones within the time period established under Rule 34(b) the documents identified below:

1. All documents in your possession which relate to the injuries you allege in your complaint, including but not limited to doctor's notes, hospital records, nurse's notes, x-ray reports, physical therapy records, bills or invoices setting forth the cost of treatments, or any other documents of any kind.
2. All wage statement or pay stubs covering a period from two months before the incident alleged in your complaint to two months after you allege you were able to return to work full time.
3. All photographs, videotapes, diagrams, or other graphic representations of the scene of the incident you allege in your complaint.
4. All photographs, videotapes, diagrams, or other graphic representations of the injuries you allege in your complaint.

Big Ray's Market, Inc.
By Its Attorneys,

Rogers Williams #9999
Williams and Jones
High Point Building
Narragansett Bay, R.I. 02800
(401) 295-0000

Certificate of Service

I hereby certify that a true copy of the within document was sent, postage prepaid, to George Z. Able, Esq., Able & White, 100 South Smith Street, Providence, R.I. 02900 on the ____ day of _____, 1999: