

**WORKERS' COMPENSATION ASBESTOS CASES
MASTER DISCOVERY**

DIANA ZALESKI

2003 AUG -6 AM 9:59

SUMMIT COUNTY
CLERK OF COURTS

REQUESTS FOR PRODUCTION OF DOCUMENTS

DEFINITIONS

Instructions and definitions pursuant to the Ohio Rules of Civil Procedure.

DOCUMENTS TO BE PRODUCED

1. All reports by any medical provider who examined, treated or consulted with Plaintiff for any respiratory/pulmonary, vascular, cardiac and/or cancer condition at any time in Plaintiff's life.

RESPONSE:

2. All medical expert reports and the curriculum vitae for each medical expert.

RESPONSE:

3. All records concerning examinations, testing, consultations and/or treatment to Plaintiff's respiratory/pulmonary, vascular, cardiac systems and/or cancer at any time in Plaintiff's life.

RESPONSE:

4. All non-medical expert reports and the curriculum vitae of each non-medical expert, including industrial hygienists and any other expert expected to testify concerning asbestos fibers and exposure.

RESPONSE:

5. All correspondence and documents exchanged with and provided to any expert, medical or non-medical, by Plaintiff in this case.

RESPONSE:

6. All documents Plaintiff intends to show any of the witnesses or use in any way in the trial of this matter.

RESPONSE:

7. All non-privileged documents or literature concerning the product or products, allegedly containing asbestos, to which you claim to have been exposed which are in your possession or in the possession of your attorney.

RESPONSE:

8. All non-privileged documents concerning, evidencing, referring to or relating to the presence of asbestos in any form at Plaintiff's worksite with any employer.

RESPONSE:

9. All witness statements pertaining to the alleged occupational disease including, but not limited to transcripts of prior testimony, depositions, affidavits, and any other complaint, grievance, report or writing concerning any alleged exposure to asbestos at any place of employment.

RESPONSE:

10. All tangible physical evidence that relates to Plaintiff's alleged occupational disease and/or alleged exposure to asbestos including, but not limited to, photographs, videotapes, blueprints, recordings, drawings, and models.

RESPONSE:

11. All employment records including Social Security disability benefits concerning Plaintiff's employment with any employer.

RESPONSE:

12. To the extent not produced in connection with the above, all documents and writings of any kind supporting Plaintiff's allegations as set out in the Complaint in this litigation.

RESPONSE:

13. All exhibits, documents, or other demonstrative evidence that Plaintiff intends to offer and introduce as evidence in the trial of this matter.

RESPONSE:

14. All exhibits, documents and/or documents exemplar to be used in Trial even if not to be offered in evidence.

RESPONSE:

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