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Brooks v UCC
Court PAPERS

STATE OF INDIANA)
) SS: IN THE TIPPECANOE CIRCUIT COURT
COUNTY OF TIPPECANOE)

JOYCE M. BROOKS, as)
Administratrix of the Estate)
of Paul Lynn Martin,)
Deceased,)
)
 Plaintiff,)
)
 v.) CAUSE NO. 79C01-8905-CP-222
)
UNION CARBIDE CORPORATION,)
)
 Defendant.)

FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

Defendant Union Carbide Corporation requests plaintiff to produce and permit it to examine and copy the following documents within thirty (30) days from the date of this request, at a time and place agreeable to both parties, in accordance with the Indiana Rules of Trial Procedure, Rules 26 and 34.

1. Complete state and federal income tax returns and supporting W-2 and all other schedules filed for Paul Lynn Martin, individually or jointly, for the years 1980 through 1987.

2. All medical and hospital records, reports and bills, including diagnostic x-rays and the like, of any physician, medical practitioner, clinic or hospital by whom or at which Paul Lynn Martin received medical care or treatment or was examined in connection with any conditions alleged in plaintiff's Complaint.

3. All hospital or medical records of Paul Lynn Martin which would indicate his medical history through the present.

4. All literature, pamphlets, Material Safety Data Sheets, containers or other tangible information in plaintiff's possession or which was in the possession of Paul Lynn Martin regarding polyvinyl chloride (PVC).

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5. All evidentiary items (including, but not limited to a receipt or cancelled check) in plaintiff's possession which plaintiff contends evidence any expenses or damages sought by plaintiff herein.

6. Any and all records regarding Paul Lynn Martin's employment at Essex Wire in Lafayette, Indiana, including, but not limited to, workman's compensation claims, medical examinations, his personnel file from Essex Wire, any safety instructions, safety manuals, and any diaries or notes of decedent regarding the chemicals to which he was allegedly exposed at Essex Wire during the term of his employment.

7. Any and all documents which plaintiff intends to use as exhibits in the trial of this matter.

8. Any and all statements secured by or on behalf of plaintiff from any employee or agent of Union Carbide Corporation.

9. Copies of the pleadings from the Estate of Paul Lynn Martin appointing Joyce M. Brooks as Administratrix thereof.

10. All bills for funeral and burial expenses of Paul Lynn Martin.

William P. Wooden

Katherine L. Shelby

Attorneys for Defendant
Union Carbide Corporation

WOODEN McLAUGHLIN & STERNER
1600 Capital Center South
Indianapolis, Indiana 46204
317-639-6151

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served upon Robert G. Ziegler, Frederick William LaCava & Associates, 3737 N. Meridian Street, Suite 504, Indianapolis, IN 46208 by United States mail, postage prepaid, this ____ day of June, 1989.

Katherine L. Shelby

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