CHAPTER 5

PERSONAL INJURY

(§5.1.1) PART ONE: PERSONAL INJURY: A PLAINTIFF’S PERSPECTIVE

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      2. (§5.2.19) Discovery Orders
      3. (§5.2.20) Scope of Discovery Permitted
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II. (§5.2.28) No Contact With Plaintiff’s Treating Physicians.

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1. (§5.2.40) Mutual Cooperation Usually Works.
2. (§5.2.41) Working with Difficult Counsel.

I. (§5.2.42) WORKING WITH CO-DEFENDANTS

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   FORM A:  Letter to Client/Defendant
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   FORM C:  Common Affirmative Defenses, Objections and Privileges
   FORM F:  Agreed Discovery Order
   FORM G:  Defendant’s Motion for Discovery Order and Supporting Affidavit
FORM H: Motion to Strike Subpoena Duces Tecum and Issue Protective Order
FORM J: Memorandum in Support of Motion to Compel Discovery
FORM K: Discovery Checklist
FORM L: Tender Letter